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PC1

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in processing work. Salmon fishing in the South Alaska Peninsula region is very important for income.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Travis Adcock
tadcock199@gmail.com
(907) 421-7810

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC2

APIA
ALEUTIAN PRIBILOF ISLANDS ASSOCIATION

With Spirit and Strength

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska, 99811-5526
Submitted via online form

February 1, 2023

RE: Opposition to Proposals 133, 134, 135, 136, 137, 138, 139, 140, 143, 148, 149 and 150

Dear Board of Fisheries Members,

The Aleutian Pribilof Islands Association, Inc. (APIA) is an Alaska Native non-profit consortium of the thirteen federally-recognized Unangax̂ (Aleut) Tribes of the Aleutian Chain, Pribilof Islands, and lower Alaska Peninsula. APIA provides primary and behavioral health care, public safety and family protection, cultural celebration and language revitalization, and environmental advocacy and technical support. We are humbled by our ancestors' stewardship of our waters, lands, and resources for thousands of years and we honor their example by continuing this stewardship, which allows us to remain on our traditional waters.

We are responding to the Alaska Board of Fisheries Request for Comments in preparation for the regularly-scheduled Alaska Peninsula/Aleutian Islands/Chignik Finfish February 2023 Meeting. APIA's Fisheries Committee is highly concerned about multiple proposals that seek to limit the mixed-stock salmon fisheries in Area M of the south Alaska Peninsula to Unimak Pass, including the Shumagin Islands (south Alaska Peninsula salmon fisheries). These potential fisheries management actions threaten our Tribal members' primary fisheries economy, threatening our communities' sustainability and our Unangax̂ culture. The desperation felt by communities reeling from fisheries failures, our communities included, can only be alleviated by the stock recoveries that scientifically-sound management can bring, and not by increasing economic hardships in other communities.

We ask you to hear our concerns:

- about misunderstandings of our fishing culture,
- the opposed proposals and their stated goals,
- improving collaborative efforts to address supply issues, including formalizing the local knowledge that has long informed local initiatives,
- and addressing the environmental change ultimately responsible for these declines.

1131 E International Airport Road Anchorage, AK 99518 t (907) 276-2700 f (907) 279-4351 www.apiai.org

One area where we see significant misunderstanding of our fishing culture is in the inappropriate conflation of incidental catch and multi-species fishing. The traditional value to gratefully accept what nature has offered to the harvester is an integral part of our culture, as well as many others, which usually means multiple species that change over the season. Incidental catch describes another species that feeds people and supports the fishing family. Incidental catch is not a traditional term, and has only recently been cast negatively since the move to single-species fisheries management. While our voluntary and proactive fishing advances allow incidental catch to account for increasingly smaller proportions of the haul, it remains an important aspect of the fishing family's bottom line. From variety for home-packs, the opportunity to document another species for future fisheries changes, and another species to rely on when unprecedented change threatens the only economy we have ever known, incidental catch amounts to resilience within the ecosystem, the fishery and our fishing-reliant communities.

The following proposals fall into three categories: concerns about Chignik sockeye, concerns about western Alaska chum, and concerns about Chinook, and so have been separated to better discuss the conservation activities of each species and area. The rational for the following four Chignik sockeye proposals have a shared faulty assumption; current management efforts appear to be improving escapement and local fishing opportunities and these successful actions should be allowed to continue at this time.

We oppose Proposal 133 because while this proposal intends to improve Chignik sockeye harvest opportunities by reducing areas fished in Area M, both Chignik sockeye escapement and harvest opportunities have improved over the last two years while recovering from environmental change, making these area closures unnecessary at this time.

We oppose Proposal 134 that asks to revert to the 2001-2003 Management Plan, but adds Chignik sockeye and Coho salmon, because Chignik sockeye escapement has been improving under the current plan and without an ADF&G-identified Coho issue in this management area, it does not warrant reverting to an outdated management plan. The call for better genetic studies is appropriate to improve our scientific understanding and management of Alaska's changing fisheries.

APIA opposes Proposal 135 that calls to manage to an 82% Unimak to 18% Shumagin Islands sockeye ratio, because this proposal may not be based on actual current proportions, nor is it necessary while the current management plan provides increasing escapement and harvesting opportunities in the Chignik area.

We oppose Proposal 150 because this proposal would increase the south Alaska Peninsula fishing areas that falls under the SEDM, setting a precedent to increase the area under more restrictive management, despite increasing escapement and harvest opportunities in the Chignik fisheries that demonstrates the effectiveness of the current management plan. Allow the current management plan to continue to provide greater escapement and fishing opportunities.

The following six proposals driven by concerns for chum salmon in western Alaska are well intended and motivated by the significant recent losses suffered by these stocks. These proposals are unlikely to accomplish their stated goals of improving chum returns to western Alaska, for several important reasons.

1) Only 17% of south Alaska Peninsula harvested chum are bound for western Alaska, including to Bristol Bay, where significantly more chum salmon are harvested.
2) A chum cap will only increase the race for fish and fishing pressure on the early runs, ensures harvest up to the cap, and disadvantage local fishermen who benefit from longer, more conservatively-paced seasons.
3) Decreasing fishing areas will increase fishing concentration on each remaining area and increase fishing pressure on each fish pulse, growing the likelihood of harvesting a run returning to an environmentally-vulnerable location.
4) Decreasing fishing time will increase fishing pressure during each opener and reduce the ability of fishermen to make test sets, plan for and execute voluntary stand-downs, and result in greater indiscriminate harvests.
5) The historic management plans requested were not developed for today's environmental conditions and would lose the voluntary gains made in the reduction of chum salmon.
6) Overly prescriptive fishing regulations deny lifelong fishermen the ability to apply their knowledge to reduce incidental catch by fishing the long game, in each season and over their lifetimes, as many local fishermen have been doing.

APIA opposes Proposal 136 because a chum cap would increase short-term competition, where fishermen will be forced to derby fish up to the cap to get their share of the catch in any given season. This strategy rewards frenzied fishing, while disadvantaging the local fisherman who needs as long and as productive of a fishing season as possible, while also ensuring that at least 280,000 chums will be harvested every year. The current voluntary fishing measures may be able to harvest less than 280,000 fish in June, especially as more of the fleet implements avoidance measures.

We oppose Proposal 137 because this proposal could result in unsustainable harvest levels for processors, unprofitable seasons for fishing families, and unrestrained harvests when there were openers, bringing into question if the stated goal of reduced chum harvest would be met. The proposal notes the unusually high harvest of 1,168,601 chum in the 2021 south Unimak and Shumagin Islands June Salmon fishery. The introduction of a new processing plant, increasing the number of active permits, and bringing in new to the area fishermen, created a rare situation that will not be repeated in the near term. The 2022 chum proportion being the lowest in 20 years shows how effective voluntary fleet measures can be, but these effective reductions would be very difficult to accomplished in a 100-hour fishery.

Proposal 138 is opposed because the proposal does not include appropriate justification to require such an extreme financial impact. No specific under-reporting, illegal fishing or scientific information need was identified that could improve conservation or enforcement. It would also be unworkable in both observer costs per fishing business, and in berth space for an

additional non-family member on tight working vessels.

We oppose Proposal 139 because this proposal would revert to reduced areas and times, concentrating effort and the race for fish. By diminishing the fleet's ability to take the voluntary actions that brought chum ratios to the lowest they have been in 20 years and less than half the number of fish as the year prior, this action would likely result in increased chum harvest.

These following two South Alaska Peninsula Salmon Management proposals were so concerning to the Aleutian Pribilof Islands Association Fisheries Committee, that the Board of Directors passed a resolution asking the Alaska Board of Fisheries to oppose Proposal 148 and Proposal 149. The stated goals are to reduce chum interception; however, the methods proposed solely focus on reducing the south Alaska Peninsula salmon fisheries.

Proposal 148 specifically intends to halve the fishing time in 3 Area M management plans if Y-K preseason forecasts fall below lower escapement goals, reduce fishing areas, and add gear restrictions. Each of these individual management strategies has the potential to increase chum catch as smaller areas are fished harder in shorter timeframes, in order to preserve the area's fishing businesses. Despite claiming to be non-prescriptive, these combined actions would force fishermen to fish faster, in smaller areas, with less time to make test sets, coordinate across the fleet, and voluntarily move off the chum to other areas and give time for runs to pass.

We also oppose Proposal 149 because, with the exception of the important request to increase genetic studies, each requested management action has the potential to increase chum harvest over current voluntary measures, and combined, would certainly force the choice between costly voluntary conservation measures and scratching out a meager salmon season.

These following two Chinook and other salmon proposals do not demonstrate the relationship between the south Alaska Peninsula salmon fisheries and the proposed conservation intent for Chinook or immature salmon. These issues deserve consideration and actions that can be expected to have a conservation impact on the stated issue, by demonstrating some correlation. We oppose Proposal 140 because reduced fishing areas and times will result in increased and concentrated pressure on fewer stocks, increasing the impacts on each run of fish.

APIA opposes Proposal 143 because it does not establish the need for increased immature salmon protections beyond the current protective actions or the relationship with the setnet fishery that would warrant the close of the set gillnet fishery, if 100 immature salmon are caught in a seine net test fishery.

Due to the lack of scientific support that these actions would improve chum returns in Western Alaska, Chignik sockeye returns, or Chinook and immature salmon returns, and because of the undue economic impacts that these proposals will impose on the fishermen and communities of the south Alaska Peninsula, these proposals should not be supported. The current efforts of south Alaska Peninsula salmon fishermen, including successful voluntary measures to actively reduce chum salmon catch and the Chignik sockeye escapement improvements under the current SEDM Management Plan, deserve your support to be allowed to continue.

These twelve proposals focus on limiting fishing time and opportunity, which will impact this season and future seasons, drive down permit value, and eventually force regional-resident fishermen out of the business, which always results in an outmigration of Unangax̂ families from our communities. Half of the Area M permits are owned by Unangax̂ families, so these issues are Tribal issues in our region too, and these proposals are Tribal threats. The larger vessels required to execute these short-season fisheries in our large and increasingly rough seas are expensive to make boat payments on, to insure, to maintain and operate, and to crew, so any impacts to the fishing season increase the odds that more Unangax̂ fishermen won't break even on expenses. As noted across Alaska, we also feel the cumulative impacts on essential subsistence harvests that the loss of commercial fishing opportunities creates, perhaps even more so when it is hundreds of dollars' worth of fuel to afford to leave the dock, a cost many cannot afford without the support of a commercial catch.

The APIA Fisheries Committee requests that the current management plans, which allow for this summer's successful voluntary incidental catch reduction measures, are allowed to continue to reduce incidental catch, improve escapement of stocks of concern, and keep our fishing families on the water to continue their essential summer fisheries. These volunteer measures also demonstrate the already existing relationship between the lifelong commitments of our region's residential fishermen to their fisheries, their communities, and their neighbors across our great State of Alaska.

The pertinent point from the 2021 anomalous chum harvest is that it was entirely due to the increase in active permits being fished by individuals that have not developed local knowledge about effective chum avoidance, nor had yet to commit to the regional self-regulation that has been an integral part of resident and long-term fishermen's fishing processes for decades. Allowing these newly-formalized collaborative efforts to continue to address chum conservation will bring benefits to the stocks in ways that we believe these proposals cannot, while also providing a test case for the future of effective, but complex, voluntary measures that can do what simpler management levers cannot.

While the primary driver for slowed chum growth, reduced in-river spawning success, and reduced runs is thought by biologists to stem from widespread environmental change, this is not a threat faced by western Alaska alone, but by all of Alaska. Our region's reliance on unpredictably-changing fisheries is front and center when our fishermen consider the implications of each morning's weather report, each season's harvest forecast, and every year-end settlement check. In Alaska, we literally pay for the consequences of our over-reliance on fossil fuels, first when we heat our homes and fuel up our boats at the nation's highest costs, and then again when we head out to find out what the sea has in store.

As our collective actions have forced much of the environmental change we are experiencing, we are also empowered to provide for the resilience and adaptation that our fisheries will increasingly require. Continually improving our understanding of these fisheries' composition, origins and shifting limitations safeguards against being blindsided by abrupt change and may even allow us to take management actions to lessen coming impacts proactively. Ongoing and

expanded genetic studies are just one of these important actions the Board has influence over, but perhaps even more effectively, actively seeking, supporting and formalizing the successful voluntary fishing partnerships that improve conservation would continue Alaska's history of innovative fisheries management.

We look forward to when the State of Alaska is able to fully implement Alaska Tribal recognition through full Tribal consultations, including at the Alaska Board of Fisheries, to better protect and facilitate Alaska Native subsistence needs, and also protect and support our Tribal right to an economy. We ask you to consider the range of Unangax̂ and Aleut voices coming together on this topic that is of such great importance for our region and our fishermen. Please contact Environment & Safety Program Administrator Karen Pletnikoff at (907)276-2700 or karenp@apiai.org with any response, questions or follow up. Qagaasakuq, qaĝaasakung, and qagaalakux for your time and your consideration!

Sincerely,

Dimitri Philemonof, President/CEO

cc: Aleutian and Pribilof Tribes
Atka IRA Council
Akutan Tribal Council
Belkofski Tribal Council
False Pass Tribal Council
Agdaagux Tribe of King Cove
Nelson Lagoon Tribal Council
Nikolski IRA Council
Pauloff Harbor Tribe
Qagan Tayagungin Tribe of Sand Point
Aleut Community of St. George
Aleut Community of St. Paul Island
Qawalangin Tribe of Unalaska
Unga Tribal Council

ALEUTIAN PRIBILOF ISLANDS ASSOCIATION, INC. (APIA)

PC2

RESOLUTION NO. 23-023

A RESOLUTION REQUESTING THE ALASKA BOARD OF FISHERIES REJECT PROPOSALS 148 AND 149

WHEREAS, the Aleutian Pribilof Islands Association, Inc. (APIA) is a regional non-profit Tribal consortium of the thirteen (13) federally-recognized Unangaxˆ Tribes of the Aleutian Chain and Pribilof Islands region of Alaska, existing to promote the overall public safety, economic, social, cultural, health, and environmental needs of the Aleut people; and

WHEREAS, APIA's roles, as partners in regional leadership, advocates for our communities, and stewards of our economies built upon the natural resources we have relied on for thousands of years, requires us to actively address the many threats our region faces; and

WHEREAS, APIA recognizes as fisheries-dependent communities, the serious threats that Alaska Board of Fisheries Proposal 148 and Proposal 149 pose to our communities; and

WHEREAS, APIA recognizes that our Tribes' members and regional communities have the right to an economy that cannot be needlessly restricted for unscientific claims or political pressure; and

WHEREAS, our region faces some of the highest energy and transportation costs in the nation, costs that would compounded by the loss of access to subsistence foods and the losses to cultural, social and economic welfare of the Unangaxˆ people that paid employment brings the individual and their family; and

WHEREAS, APIA supports the Tribal self-determination, equity and environmental justice that the 72 Unangaxˆ permitholders of the 144 2022 Area M Salmon Purse Seine permits need by allowing our fisheries to continue for communities wholly reliant on these seasonal opportunities; and

NOW THEREFORE BE IT RESOLVED, that the Board of Directors of the Aleutian Pribilof Islands Association, Inc. hereby calls for the Alaska Board of Fisheries to reject Proposals 148 and 149 for failing to address the issue as proposed: improving chum returns to western Alaska and the Yukon-Kuskokwim Rivers, due to targeting only one area with an insignificant fraction of the incidental catch, failing to target other areas with much greater incidental catch, and placing the burden of the impacts of climate change on multiple stocks on one region, one area, and one people.

NOW THEREFORE BE IT FURTHER RESOLVED, that the Board of Directors of the Aleutian Pribilof Islands Association, Inc. calls on the Board of Fisheries to authorize staff and department resources to support the current voluntary efforts of the Area M fishmen to improve in-season chum avoidance, which has already shown improvements in reduced take.

PASSED AND APPROVED this 14th day of December, 2022.

SIGNED:

Chairman of the Board

ATTEST:

Recording Secretary

ALEUTIAN PRIBILOF ISLANDS ASSOCIATION, INC. CORPORATE SEAL STATE OF ALASKA

AKUTAN • COLD BAY • NELSON LAGOON
ALEUTIANS EAST
BOROUGH
FALSE PASS • KING COVE • SAND POINT

February 6, 2023

Alaska Board of Fisheries
Märit Carlson-Van Dort, Chair

Chair Carlson-Van Dort and Board Members,

The Aleutians East Borough is the municipal government that encompasses the communities of King Cove, Sand Point, Cold Bay, Nelson Lagoon, Akutan and False Pass. Aleutians East Borough communities were founded on local salmon fisheries. Salmon processing was established in the Borough over one hundred years ago, and salmon have sustained the Aleut people here for thousands of years. Salmon are critical to Borough residents for our culture and our economy.

The Aleutians East Borough supports maintaining the current South Peninsula Salmon Management Plan. We applaud South Peninsula salmon seiner efforts to limit chum harvest in 2022 and support their plan to continue and improve these conservation efforts in 2023. We agree with our fishermen that success of their action plan to conserve chum salmon in 2023 and beyond is contingent on the time and area provided in the current plan. The Aleutians East Borough opposes any proposals that would unnecessarily reduce fishing time and area in the South Peninsula salmon fisheries and hamper fishermen conservation efforts.

The attached Resolution 23-33 adopted by the Borough Assembly January 12, 2023 states:

- Borough support of South Peninsula seiner efforts to limit chum harvest
- Borough support of the current South Peninsula salmon management plan
- Borough opposition to proposals that threaten the South Peninsula salmon fishery.

The Aleutians East Borough opposes Proposal #s 133, 134, 135, 136, 137, 138, 139, 140, 143, 148, 149, and 150.

We empathize with AYK communities where salmon fisheries are struggling; we're concerned and we want to help find solutions. At the Board's AYK finfish meeting, report after report defined these issues and the probable causes for the struggling stocks as environmental and climate related. And although the 2022 chum genetic study in the South Peninsula confirms that the majority of chum salmon harvested in the June South Peninsula fishery are of Asian origin, we support Area M Seiners efforts to conserve and avoid all chum salmon in June, and to share in the burden of conservation. The South Peninsula salmon seine fleet conservation efforts in 2022 resulted in the lowest chum to sockeye harvest ratio since the 1970's.

With help from the Borough, South Peninsula fishermen have developed the ability to communicate and exchange information in real time and we believe these fishermen can do even

better to avoid chum in 2023 and future years *IF* time and area conditions similar to the current South Peninsula Salmon Management Plan continue. Further restrictions on fishing time and area in the South Peninsula will be counter-productive to this volunteer fishermen program.

We are pleased that Chignik sockeye escapement in 2022 improved by over 150% of the previous 4 years average escapement and that Chignik fishermen were able to harvest over 300,000 sockeye, over 70,000 chum and over one million pink salmon in 2022. We pray these improvements in the Chignik salmon fishery continue in 2023.

Proposals that restrict fishing in the South Peninsula will not only hamper fishermen's volunteer conservation efforts, these proposals will damage Aleutians East Borough and local community economies. Proposal 140, for example, would take South Peninsula salmon management back to the regime from 2001-2003, and reduce fishing time by over 70%. When these restrictions were implemented in 2001, actively fished salmon permits in the South Peninsula plummeted to the lowest levels ever, taking years to recover.

Aleutians East Borough fish tax revenues from salmon from 2001-2004 were at the lowest percentage of total fish tax in Borough history. This is increasingly important as fish tax revenue from crab and groundfish is beginning to recede. Raw fish tax from salmon in 2021/22 represents the largest percentage of overall fish tax revenue of any 2-year period in Borough history. Aleutians East Borough revenue from fish tax is important for maintaining schools and developing infrastructure projects to improve the lives and safety of our residents and the mariners within our waters. Our total bond debt, acquired in part to complete these projects, is 20 million dollars and our annual bond debt service is 2.5 million. Proposal 140 and other proposals like 140 will impede our ability to fulfill our Borough obligations and be detrimental to the lives of our residents.

Changes to the South Alaska Peninsula Salmon Management plan are not necessary to facilitate conservation of Chignik sockeye salmon or AYK chum salmon. The current management plan of our historical mixed-stock fishery allows the time and area for chum conservation, and along with ADFG EO authority, will aide in the recovery of struggling stocks. Please use the available science to inform your decisions at the Alaska Peninsula/Aleutian Islands/Chignik Finfish meeting this month. The Aleutians East Borough is ready and willing to work with the Board and other Alaska fishery stakeholders to help arrive at the best outcomes for all Alaskans.

Sincerely,

Alvin D. Osterback, Mayor
Aleutians East Borough

PC3

AKUTAN • COLD BAY • NELSON LAGOON
ALEUTIANS EAST BOROUGH
FALSE PASS • KING COVE • SAND POINT

RESOLUTION 23-33

A RESOLUTION OF THE ALEUTIANS EAST BOROUGH SUPPORTING THE CURRENT SOUTH ALASKA PENINSULA SALMON MANAGEMENT PLAN AND OPPOSING CERTAIN PROPOSALS BEFORE THE BOARD OF FISHERIES.

WHEREAS, the Aleutians East Borough is the municipal government whose boundaries include the Alaska Department of Fish and Game Salmon Management Area M, and

WHEREAS, the fishing communities of the Aleutians East Borough were founded on the local salmon fisheries, and

WHEREAS, commercial salmon fishing and processing has been active in the region for over one hundred years and the local Aleut people have subsisted on the salmon for thousands of years, and

WHEREAS, Aleutians East Borough revenue from taxes on salmon delivered to our shore plants is significant, and

WHEREAS, Area M salmon fishermen will be defending their fisheries and livelihoods at the February 2023 Board of Fisheries Alaska Peninsula/Aleutian Islands/Chignik Finfish meeting in Anchorage, and

WHEREAS, there are a number of proposals to be considered at the February meeting that would needlessly constrict South Alaska Peninsula salmon fisheries, and

WHEREAS, South Alaska Peninsula salmon fishermen have been working tirelessly to address other regions salmon concerns – to limit harvest of Chignik-bound sockeye salmon and to limit harvest of AYK-bound chum salmon - sharing in the burden of conservation for those struggling stocks, a sacrifice that results in lost revenue for these fishermen, and

WHEREAS, previous actions by the Board of Fisheries and by Area M fishermen have resulted in improvements in Chignik Sockeye salmon escapement and commercial fisheries, and

WHEREAS, Area M salmon seine gear fishermen working together to avoid chum salmon during the June 2022 fishery resulted in the lowest June chum to sockeye salmon ratio in decades, noting that the majority of these chum are Asian chum not AYK-bound, and

WHEREAS, it is important to maintain the current South Alaska Peninsula Salmon Management plan in order for these fishermen conservation efforts to continue to be successful, and

WHEREAS, these proposals would enact restrictive conditions, including reduced fishing times and areas, that would hamper South Alaska Peninsula salmon fishermen conservation measures: Proposals 133, 134, 135, 136, 137, 138, 139, 140, 143, 148, 149, and 150, and

WHEREAS, restricting the South Alaska Peninsula salmon fisheries will result in economic distress for families, businesses and communities in the Aleutians East Borough.

NOW THEREFORE BE IT RESOLVED, the Aleutians East Borough Assembly supports the conciliatory efforts by Area M fishermen sharing in the burden of conservation of Alaska salmon that have yielded impressive results, and

BE IT FURTHER RESOLVED, the Aleutians East Borough Assembly supports the current South Alaska Peninsula Salmon Management Plan that will allow the time and area for fishermen to continue these conservation efforts and feed their families, and

BE IT FURTHER RESOLVED, the Aleutians East Borough Assembly opposes the following Board of Fisheries 2022/2023 cycle proposals that would needlessly limit South Alaska Peninsula fishermen conservation efforts and opportunities to make a living: The Aleutians East Borough Assembly opposes Board of Fisheries 2022/2023 Proposals 133, 134, 135, 136, 137, 138, 139, 140, 143, 148, 149, and 150.

PASSED AND APPROVED by the Aleutians East Borough Assembly on this 12th day of January, 2023.

Alvin D. Osterback, Mayor

ATTEST: _____
Beverly Rosete, Clerk

PC3

February 6, 2023

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair
Via email: dfg.bof.comments@alaska.gov

Re: The Importance of Salmon to the Aleutians East Borough and Communities

Chair Carlson-Van Dort and Board Members,

On January 12, 2023, the Aleutians East Borough Assembly adopted Resolution 23-33 Supporting the Current South Alaska Peninsula Salmon Management Plan and Opposing Certain Proposals Before the Board of Fisheries. This resolution states AEB support for June 2022 fishermen actions to conserve chum salmon in order to address AYK stock concerns. It also states support for the current South Alaska Peninsula Management Plan that allows sufficient time and area during the salmon season for these conservation efforts. Finally, Resolution 23-33 states the Assembly opposition to Proposal #s 133, 134, 135, 136, 137, 138, 139, 140, 143, 148, 149, and 150, that threaten the South Alaska Peninsula salmon fishery.

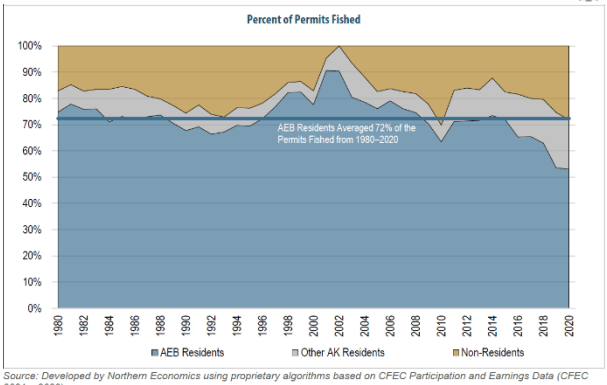
Impacts to the Aleutians East Borough

The Aleutians East Borough was founded in 1987 to assume responsibility for schools in the Borough, and for building and maintaining boat harbors, docks, roads, schools, clinics, airport terminals and overall facilitating transportation and well-being for our communities. The Borough represents six communities including Akutan, Cold Bay, False Pass, King Cove, Nelson Lagoon, and Sand Point. Many Borough-led infrastructure projects have required securing bonds; our annual bond debt service is 2.5 million and our total bond debt as of March 2022 was 20.5 million dollars. Bond debt was accrued over the years to improve quality of life in our communities; schools have been repaired and new ones built to provide for our children's education, airport improvements for better access, and harbors built to provide safe haven for the local fishing fleet and transient vessels for repair and rest for the crew.

The Borough collects a 2% tax on raw fish delivered to onshore processors within the Borough and our communities. AEB fish tax on salmon for fiscal year 2022 amounted to 28% of all AEB fish tax, making 2022 the second largest proportion of salmon fish tax since at least 1999 due to the declines in groundfish stocks. Salmon fish tax was 30% of all FY2018 fish tax, 18.6% in FY2019, 19.3% in FY2020 and 20% of FY2021 fish tax. Salmon remains an important component of AEB's overall revenue. Salmon raw fish tax is particularly important to the cities where it is delivered and processed: False Pass, King Cove and Sand Point.

Further losses in salmon revenue combined with lost groundfish and crab fisheries, plus the predicted loss of pollock revenue to the Borough, could jeopardize critical infrastructure projects and bond repayment,

potentially resulting in the establishment of property taxes on Aleutians East Borough residents and businesses.



Source: Developed by Northern Economics using proprietary algorithms based on CFEC Participation and Earnings Data (CFEC 2021a, 2022)

Figure 1. Percent permits fished in the Area M Purse Seine salmon fishery, 1980-2020.

Impacts to Aleutians East Borough Residents

Aleutians East Borough communities were founded on local salmon fisheries. Salmon processing was established in King Cove, False Pass and Port Moller over one hundred years ago, and these communities are the heart of South Alaska Peninsula Salmon Management Area. The majority of Area M salmon fishing permits are owned and used by Alaska residents, and specifically for Area M purse seine, AEB residents averaged 72% of the permits fished between 1980-2020 (Figure 1). Fishermen and processors have diversified to other species of fish, but salmon remains the economic and cultural backbone of our communities. Resident subsistence activities are also closely tied to the commercial salmon fishery.

In 2022, the AEB commissioned Northern Economics to conduct an economic analysis on the importance of salmon fisheries to the AEB using publicly available data[1]. There is a major concern regarding the decline of groundfish stocks in Alaska, and this is reflected in the key findings of the report. Beginning in the early 2000's, there has been a slow but steady decline in the proportion of groundfish and shellfish revenue generated by AEB resident harvesters, causing an increased reliance on salmon revenue (Figure 2). This is further demonstrated by the steady decrease in AEB resident groundfish and shellfish permits, while in contrast, salmon permits have remained relatively constant since the early 2000's (Figure 3). What these figures do not reflect (due to limitations in available data) is the continuous decline or absence of groundfish and crab stocks since 2020, which would have significantly increased the proportion of revenue generated by salmon.

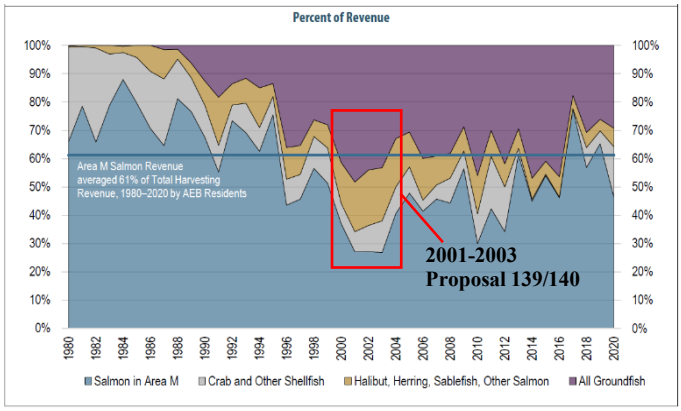


Figure 2. Revenue generated by AEB residents in all Alaska fisheries by species group, 1980-2020.

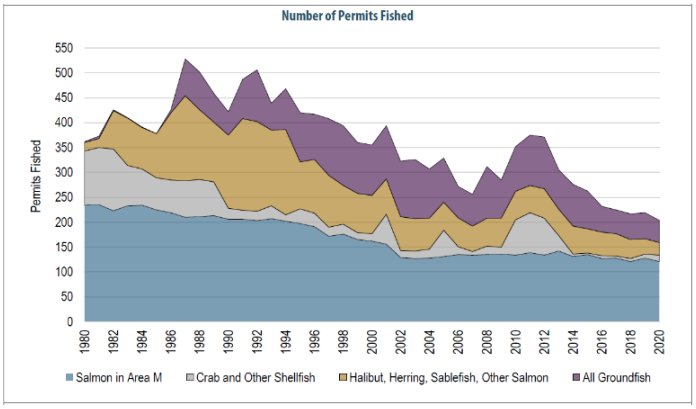


Figure 3. Permits fished by AEB residents in all Alaska fisheries by species groups, 1980-2020.

[1] Northern Economics, Inc. *The Importance of Fisheries to the Aleutians East Borough*. Prepared for Aleutians East Borough. March 2022.
www.aebfish.org/resolution23.33.pdf
www.aebfish.org/draftNE2022report.pdf

As noted previously, most AEB communities were founded on salmon fisheries and have entirely fisheries-based economies. Without fisheries, there are very few employment opportunities. As of 2020, total employment in the AEB across all industries was approximately 2,250 employees representing the total private ownership sector (which includes harvester and seafood processing companies) accounting for 90% of the work force (Figure 4).

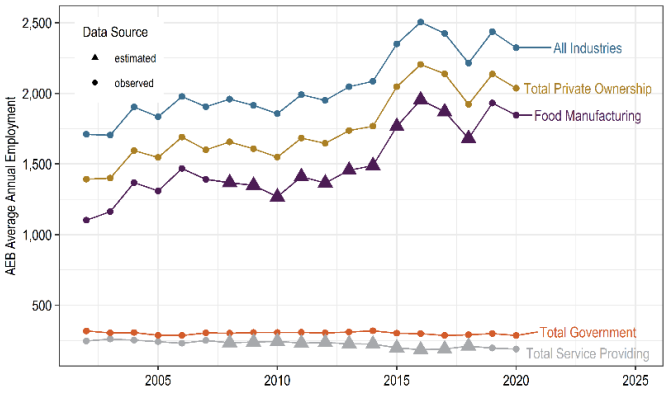


Figure 4. Total AEB Employment by Industry

There are several proposals before the Board of Fisheries that would severely limit South Peninsula salmon fisheries, that will harm local economies and trigger a significant loss of fish tax revenue for the Aleutians East Borough and communities. Of greatest concern are Proposals 139 and 140, that seek to replace the current management plan with the 2001-2003 management plan. When this management plan was implemented over 20 years ago in 2001, it resulted in 37% loss of active Area M permits by 2003 – the lowest number of permits held in history. While the number of permits stabilized after that management plan was superseded, many local permits were lost permanently, and the fishery never fully recovered to pre-2001 levels. Due to the high costs and volatility of fishing, in order to sustain their livelihoods, local fishermen must diversify their participation in other fisheries. The drastic drop in salmon permits after the 2001 management plan likely made it difficult to afford a fishing lifestyle, resulting in a loss of permits for other fisheries such as groundfish and shellfish (Figure 2). The devastation of this management plan is further reflected by the lowest salmon AEB fish tax revenue during the 2001-2003 period (Figure 5). The Aleutians East Borough supports the current South Alaska Peninsula Salmon Management Plan unchanged as critical to our Borough financial obligations and commitments to our residents.

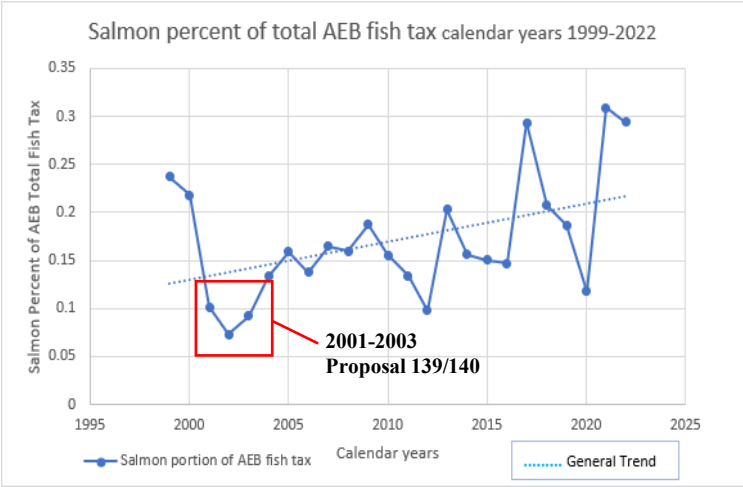


Figure 5. Proportion of AEB fish tax revenue generated by salmon between 1999-2022.

Sincerely,

Ernie Weiss, Natural Resources Director

Charlotte Levy, Natural Resources Assistant Director

www.aebfish.org/resolution23.33.pdf
www.aebfish.org/draftNE2022report.pdf

PC4

Submitted by: Michael Alfieri

Community of Residence: Renton, Washington

Comment: I oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 - 143, & 148 - 150.

I started fishing Area M in 1979. Running seiners there since 1981. Then my seiner, the Ocean Storm, since 1993. I've been dealing with this issue of declining Chum salmon runs in the AYK and the cause being attributed to Area M for almost as long. We've endured gear restrictions, Chum caps and the runs in the AYK are still in crisis. To quote the commissioner of ADF&G, Doug Vincent-Lang, "there is no obvious silver bullet cause of the recent low returns."

All I'm imploring the Board of Fisheries to do is follow the science. Two previous studies, a tagging study and a genetic study can not conclusively determine that the salmon fishery in Area M is catching a significant number of Chums that are bound to the AYK region. There's a new genetic study, soon to be released, that will add additional information to what fish are actually being caught in the June Salmon fishery in Area M. I can honestly say that for myself anyway, if the newest study determines that Area M is a substantial cause of declining runs in the AYK then I am prepared to take measures that will rehabilitate those runs.

On the flip side if the newest study doesn't conclusively determine a cause that Area M is to blame for the declining runs in the AYK then I would hope the Board of Fish and the State of Alaska come up with appropriate responses to help rehabilitate those runs.

Maybe I'll finally just have to worry about fishing in June like I did back in 1979.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC5

February 4, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sitka, Alaska and I participate in commercial fisheries. Salmon fishing in the South Alaska Peninsula region is very important. Salmon seining in Area M is a huge part of my livelihood and my crew's livelihood. It makes up roughly 85% of my gross income, which helps to support my family as well as my crew's family. Personally, I have two young kids and one more on the way, and I'm the only source of income for my family. With the rising cost of everything and how tough it is for the younger generation to actually afford to get into the fishing industry now, it would be devastating to my livelihood, my family, and my crew that are the sole income provider for their family.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Jasper Allbrett
jasperallbrett@gmail.com
(808) 368-6647

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC6

Madame Chair and Members of the Board,

There is an ongoing collapse of the fishing system that has been happening for quite a few years that must be repaired. You have now witnessed multiple areas such as Chignik, AYK, Nelson lagoon, and now even Bristol Bay Chinook, as well as many other stocks diminishing returns on the valuable stocks of salmon. This is not a single faceted problem but more of a multifaceted problem that can be corrected. Unfortunately as it has gone so many years in the making without the correct adjustments that it will be painful for the fisherman as it was when stocks were being rebuilt in the 1960s.

My ongoing studies of the past century of management and adaptation of the salmon fisheries has led me down a path of comprehensive understanding as to the failures and the missteps that have been made in the past creating the catastrophe that we are in now. Please remember these are repairable changes, so here we go.

I'm going to start off with mixed stock fisheries as they are the most important point to control. The South Peninsula for years has enjoyed the prosperity of the Bristol Bay run returning in large quantities that has afforded them wonderful economically valuable seasons; unlike in 1974 when they were shut down by the BOF due to the Bristol Bay season looking like it would not come in strong enough to be economically viable to the Bristol Bay fisherman, but still would receive it's escapement. Since then the Bristol Bay fish retuning have risen in their count year after year even with so called over escapement; but before that time the South Peninsula collected fish from a multitude of resources that was considered excess and they were given access to everyone's excessive amounts to spread the wealth through the entire state of Alaska. The system worked very well until it became unbalanced as it is now, when a few things happened,

1. The regulation change that happened in 2001 and concurrent year of 2004 that shifted the concentration of fishing closer to Chignk. This was due to the loss of the allocation that resulted in the removal of the ratio, approximately 80% Unimak fishery and 20% Shumagin island.

2. The expansion of a mixed stock fishery allowing the Dolgoi island area to be opened in June and allow areas normally unfished to be open.

3. At the same time the ADF&G adjusted escapement timing in Chignik as well as escapement values and management styles that masked the effect and the corresponding drop in production due to BOF changes.

4. The changes in the opening time to an earlier date in the South Peninsula also dropped the amount of fish able to return to the first run of Chignik; and the time in area expanded to not provide large enough windows of opportunity for fish to move to their natal streams.

Each of these things were not the exclusive cause but more of a combination of events that created the collapse. If the Bristol Bay stocks were not doing well currently, the South Peninsula would likely be shut down due to lack of Salmon returning their natal streams; If not The South Peninsula fishery would be favored over conservation by all of the management groups. So that being said; how is it that they are allowed to continue, in the same way, because one stock of fish is doing well in the group of this mixed stock fishery, and the other areas aren't afforded the correct amount of fish to maintain MSY and sustainability? The answer is preferential treatment if you were unclear.

Chignik fishery is no longer a sustainable fishery in its current way of being managed. The department will lead you to believe that it is sustainable, but they only believe that fish

returning year after year in some level is considered sustainable; but that is not a fishery and if you can't afford to replace equipment and upgrade and survive off the income generated then it's not sustainable and anything other than that truth is a manipulation. This is especially evident in the difficulty of retrieval of subsistence fish in the area, though some fish may be returning, they are not in the same surplus that they were, to make access acceptable to retrieve subsistence in a reasonable way that is cost and time effective. The ADF&G will say things like Chignik's productivity is down because the fish are not returning as they once did, but they conveniently leave out the fact that they have reduce the number of Black Lake fish since the 2000s and the expanded fishery in the South Peninsula does reduce the amount of fish returning, showing lack of productivity, and now they want to turn it into a single run fishery and change the amount of fish that will be returning to the watershed as escapement to a lower number once again causing Chignik to meet the escapement goals and allow the South Peninsula debilitating fishery to continue to fish unencumbered, but not make enough fish for local MSY. They have literally turned maximum sustained yield into minimum sustained escapement with absolutely no regard for maintaining the yield that should be afforded to the Chignik fishery as well as others. The ADF&G has theoretically come up with a rational that the lower Lake constitutes the carrying capacity of whether or not the Chignik run can make fish in significant enough quantity, while disregarding a century worth of information and major thesis' that show otherwise. They are also lowering escapement goals in other areas and even in the South Peninsula, to maintain the South Peninsula fishery as the BOF has created by regulation; because if you can't make escapement just lower the escape, and then everything will be able to continue as the BOF has determined because they don't want to fight the board, so they make it fit in the box. Stop setting them up for failure.

The Chignik area has diminished to half its fleet as well as lost most of its populous that are leaving to go find different jobs in other areas. In fact this BOF has designated it a management of concern. This action was greatly appreciated and the effect of reducing fishing time in the South Peninsula helped return fish back to the natal streams last year helping to meet escapements; But long before that designation this could have been repaired had the warnings been heeded. The processors have moved out of the area as they warned Chignik if the salmon did not come back they could not maintain their presence and the Chignik people spoke this at previous board meetings to explain the upcoming loss that would occur. Now nothing gets processed in the Chignik area where there could be generating tax revenue as well as having multiple fisheries locally like crab, cod, bait fish, halibut and of course salmon.

The effectiveness of fisherman and the allowable gear has also contributed to some of this problem. I cannot blame fisherman for doing their job in a system that gives them no good sideboards. I will no longer blame other fisherman for doing their job. This is on you, the BOF, and the ADF&G; you are the responsible entities and must get this repaired. I don't want this fate to happen and to also occur in the South Peninsula fisheries either. There's a way to continue to give opportunity to South Peninsula and not decimate all of the other fisheries. With a combination of the proposals that are before you today, returning the South Peninsula to having larger windows, reducing time in area, focused fishing on Bristol Bay stocks, shallowing of nets to reduce catches of passing dog salmon and Chinook and making sure that immatures are not being caught are effective changes that can repair the system without completely shutting them down.

As a member of the Chignik AC my voting record is before you in the AC minutes in what I support and do not support.

Thank you for your time.

Sincerely,
Benjamin Allen

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 105: Oppose
Proposal 106: Support
Proposal 107: Oppose
Proposal 108: Oppose
Proposal 109: Support
Proposal 110: Oppose
Proposal 111: Support With Amendments
Proposal 112: Oppose
Proposal 113: Oppose
Proposal 114: Oppose
Proposal 115: Oppose
Proposal 116: Oppose
Proposal 117: Oppose
Proposal 118: Support
Proposal 119: Support
Proposal 120: Support
Proposal 128: Support With Amendments
Proposal 130: Oppose
Proposal 131: Oppose
Proposal 132: Oppose
Proposal 133: Support
Proposal 134: Support
Proposal 135: Support
Proposal 136: Support
Proposal 137: Support
Proposal 138: Oppose
Proposal 139: Support
Proposal 140: Support
Proposal 142: Oppose
Proposal 143: Support
Proposal 144: Oppose
Proposal 145: Oppose
Proposal 146: Oppose
Proposal 147: Oppose
Proposal 148: Support
Proposal 149: Support With Amendments
Proposal 150: Support
Proposal 151: Oppose
Proposal 152: Oppose

PC7

1/3/2023

Chair Carlson Van-Dort and members of the Board,

I support Proposal 143. The presence of immatures in the South Pen salmon fishery has been well documented for years. With the faltering salmon runs from Chignik (Sockeye and Chinook) to AYK (Chum and Chinook), it is critical to not waste these young salmon before they can mature and contribute as adults. The time frames, quantities and locations in the South Pen vary from year to year but can be expected from about June 25th through July 22nd.

Up until the last few years, gillnetters had a minimum mesh size of 5 ¼" and so they were exempt from immature closures because of that (immatures could easily pass through unharmed). Now there is no minimum mesh size to protect these immatures, but gillnetting is still allowed when they are present. This along with seining can destroy valuable resource for future years. If gillnetters wish to use meshes smaller than 5 ¼ ", then they should be restricted from fishing when immatures are present.

Presently, the test fishery only samples for about three days during the first week of July. This is inadequate protection when immatures can fluctuate in before or after that time.

And during the test fishery, only the gilled immatures are counted but the total amount of immatures in the "mature" catch (non-gilled) is not separately enumerated and can be substantial.

The objective of the present test fishery is to provide a timely index of the immature salmon abundance within the marine waters in the vicinity of the Shumagin Islands and to reduce the potential for large catches of immature salmon, thus maximizing future escapement and harvest. But this is only happening for about three days out of one week, out of a one month timeframe, and not necessarily from the last week of June through the third week of July when immatures can move into the area.

I believe that this resource should be carefully conserved for future escapements and harvests. It is even more important while salmon runs in other areas that depend on these salmon to return are struggling with low escapements and low yields. Not knowing where they originated is a poor excuse for wastefulness.

Also, I oppose Proposal 151. This effectively makes a stationary drift net anywhere and opens an immense area where setnetting will become available. The seine web used in the lead doesn't specify a size and it will clearly become a new risk to immatures present as well.

Kodiak by comparison and for instance is very precautionary and use leads as they were intended:

(A) no portion of the seine web may be in water deeper than five feet at the lowest tide of the current day; or

Area M as a primarily intercept fishery, should be held to the highest conservation and precautionary standards when fishing. Please support 143 and its conservation intent and please oppose Proposal 151 as it would expand an existing fishery and it would jeopardize immature salmon.

Thank you,

Raechel Allen

4K92-17

PC7

THE INCIDENCE OF IMMATURE SALMON IN SOUTH PENINSULA PURSE SEINE FISHERIES, 1963-91

By

James N. McCullough

and

Arnold R. Shaul

Regional Information Report[1] No. 4K92-17

Alaska Department of Fish and Game
Division of Commercial Fisheries
211 Mission Road
Kodiak, Alaska

April 1992

[1]The Regional Information Report Series was established in 1987 to provide an informational access system for all unpublished divisional reports. These reports frequently serve diverse ad hoc informational purposes or archive basic uninterpreted data. To accommodate timely reporting of recently collected information, reports in this series undergo only limited internal review and may contain preliminary data; this information may be subsequently finalized and published in the formal literature. Consequently, these reports should not be cited without prior approval of the author or the Division of Commercial Fisheries.

AUTHORS

James N. McCullough is the Alaska Peninsula and Aleutian Islands Management Areas Herring Biologist and Alaska Peninsula-Southeastern District Salmon Management Biologist for Region IV, Alaska Department of Fish and Game, Division of Commercial Fisheries, 211 Mission Road, Kodiak, Alaska, 99615.

Arnold R. Shaul is the Alaska Peninsula, Aleutian Islands, and Atka-Amalia Management Areas Salmon Management Biologist for Region IV, Alaska Department of Fish and Game, Division of Commercial Fisheries, 211 Mission Road, Kodiak, Alaska, 99615.

ACKNOWLEDGMENTS

Alaska Department of Fish and Game employees Richard Guthrie, Bob De Jong, Tyler Gilmer, and Len Schwarz provided personal communications in the form of memorandums used in this report. Steve Kruger in 1990 and Mark Stopha in 1991 were the project leaders for the Shumagin Islands Section test fishery. Pete Probasco and Bruce Barrett provided supervisory support and editorial assistance.

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ABSTRACT

By state policy, commercial purse seine fisheries in South Peninsula waters of the Alaska Peninsula Management Area will be closed by emergency order when excessive by-catch of immature salmon occurs (ADF&G 1990). In making a decision to close a fishery the department considers average number of immatures per set, fleet distribution, and historical dates of immature salmon occurrence. The Alaska Department of Fish and Game has been instructed by the Alaska Board of Fisheries to utilize results from subsistence, commercial periods, and test fishing to evaluate the abundance of immature salmon. Because the catch of immature salmon is limited to purse seine gear, gill net gear may continue to operate during periods when the seine fishery is closed by emergency order due to the presence of immature salmon.

In 1963, the South Peninsula commercial salmon fishery was closed for the first time due to the presence of immature salmon. The fishery was also closed in 1968, 1969, 1974, 1979, 1989, 1990, and 1991 due to immature salmon by-catch problems. Sockeye (*Oncorhynchus nerka*) and chum (*O. keta*) salmon were the primary immature salmon species caught in purse seine gear.

In recent years a change in the species composition of immature salmon has occurred. Prior to 1975, about 90% of the immature salmon caught in the Shumagin Islands Section were sockeye salmon. After 1988, the immature catch has been about 50% sockeye and 50% chum salmon.

Immature salmon stock identification studies have not occurred.

KEY WORDS: Alaska Peninsula, sockeye, chum, salmon, immature, seine, by-catch

INTRODUCTION

The South Peninsula area of the Alaska Peninsula Management Area consists of Pacific Ocean coastal waters extending west of Kupreanof Point to Scotch Cap on Unimak Island (Figure 1).

During normal fishing operations, immature salmon of three species are inadvertently caught in purse seine gear: chinook salmon (*Oncorhynchus tshawytscha*), sockeye salmon (*O. nerka*), and chum salmon (*O. keta*; M. Stopha, Alaska Department of Fish and Game, Sand Point, personal communication).

In the Shumagin Islands Section, most purse seine fishing effort occurs in the near shore waters of Popof Island at Popof Head, Middle Set, and Red Bluff (Figure 2). Deep water offshore of the beach allows nets to be deployed close to the shore. Twenty-minute sets, in vessel rotation, are used to catch salmon migrating westward.

Historically, the presence of immature salmon in South Peninsula waters has caused the curtailment of all commercial fishing in effected areas during late June or July in 1963, 1968, 1969, 1974, and 1979 and purse seine fishing in 1989-91 (Shaul et al. 1991, McCullough 1991). After 1979, regulations were adapted curtailing only purse seine fishing in effected areas. The problem associated with immature salmon is restricted to the purse seine fleet. Immature salmon are gilled in the seine webbing resulting in what is likely a 90-100% mortality factor (R. Guthrie, Alaska Department of Fish and Game, Sand Point, personal communication). By regulation, seine mesh size may not be more than 3 1/2 inches except the first 25 meshes above the lead line which may not be more than 7 inches (ADF&G 1990). By regulation, gill net mesh size can not be less than 5 1/4 inches; the larger mesh size in gill net gear allows for unrestricted passage of immature salmon through gill net gear (M. Stopha, Department of Fish and Game, Sand Point, personal communication).

Historically, immature salmon cause the greatest problem in the Shumagin Islands Section. Catches of immature salmon were first brought to the attention of the Alaska Department of Fish and Game (ADF&G) in 1963. Currently, about 55 purse seine permit holders must either remain on the beach or move to other open areas that are not as productive as the Shumagin Islands Section or the waiting period at favored sites is extended by their presence. Immature salmon usually migrate out of the Shumagin Islands Section by July 23 (G. Davenport, Alaska Department of Fish and Game, Sand Point, personal communication). In 1990 purse seine gear closures remained in effect until July 25 (Shaul et al. 1991).

Test fishing results in the Shumagin Islands Section is also used as a indication of the likelihood of the presence of immature salmon in other management areas. In 1991, the Mitrofania Section of the Western District of the Chignik Management Area was closed due to immature salmon from July 11 to August 8, and the entire Western and Perryville Districts were closed from August 8-11.

The objective of this report is to present personal communications and test fish results on the occurrence of immature salmon from the South Peninsula. This information will provide a data base for evaluating management goals and is intended as a reference document; interpretation and discussion of the data are therefore limited.

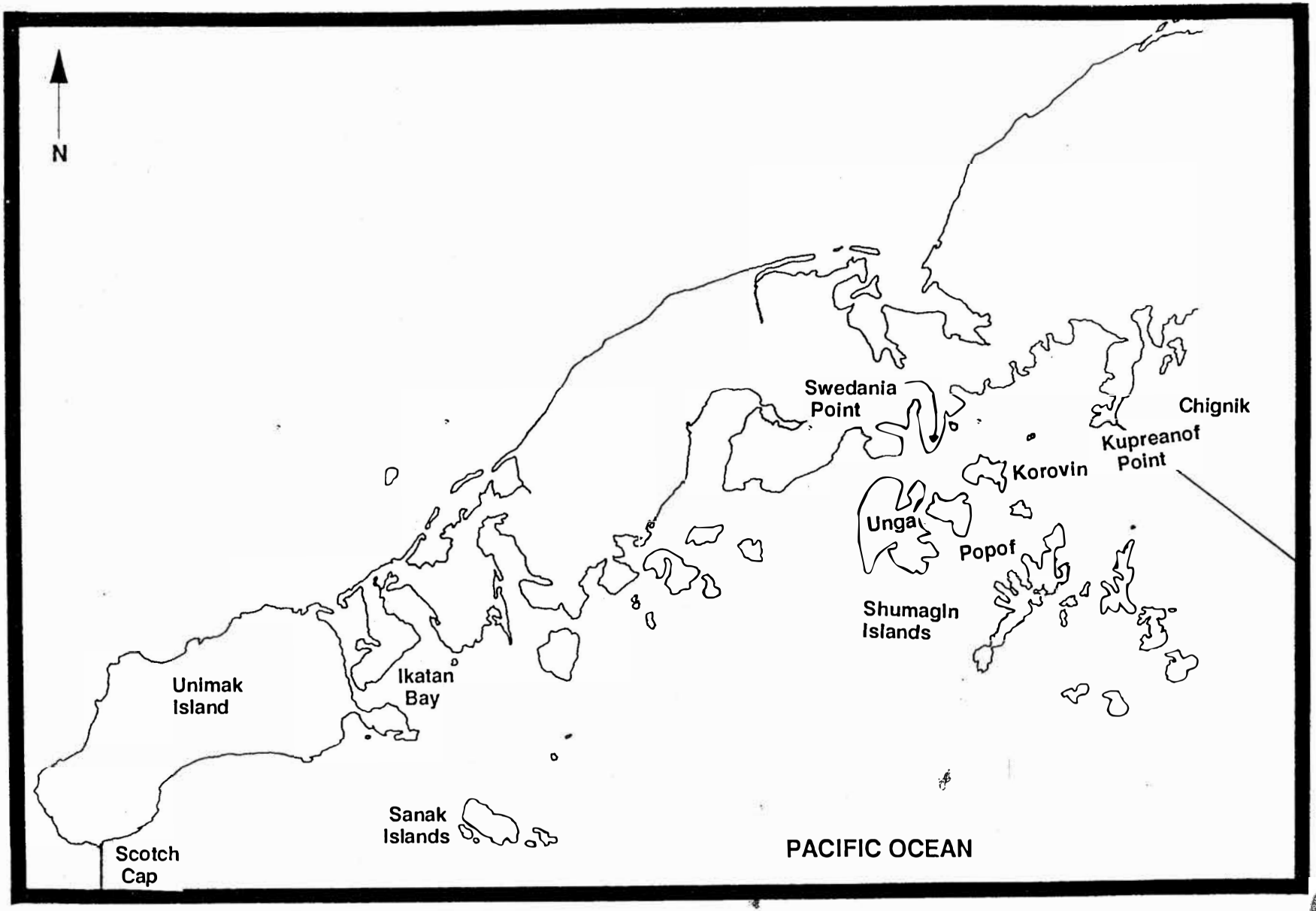

Figure 1. Map of the South Peninsula, the study area on the Pacific Ocean portion of map is from Kupreanof Point to Unimak Island.

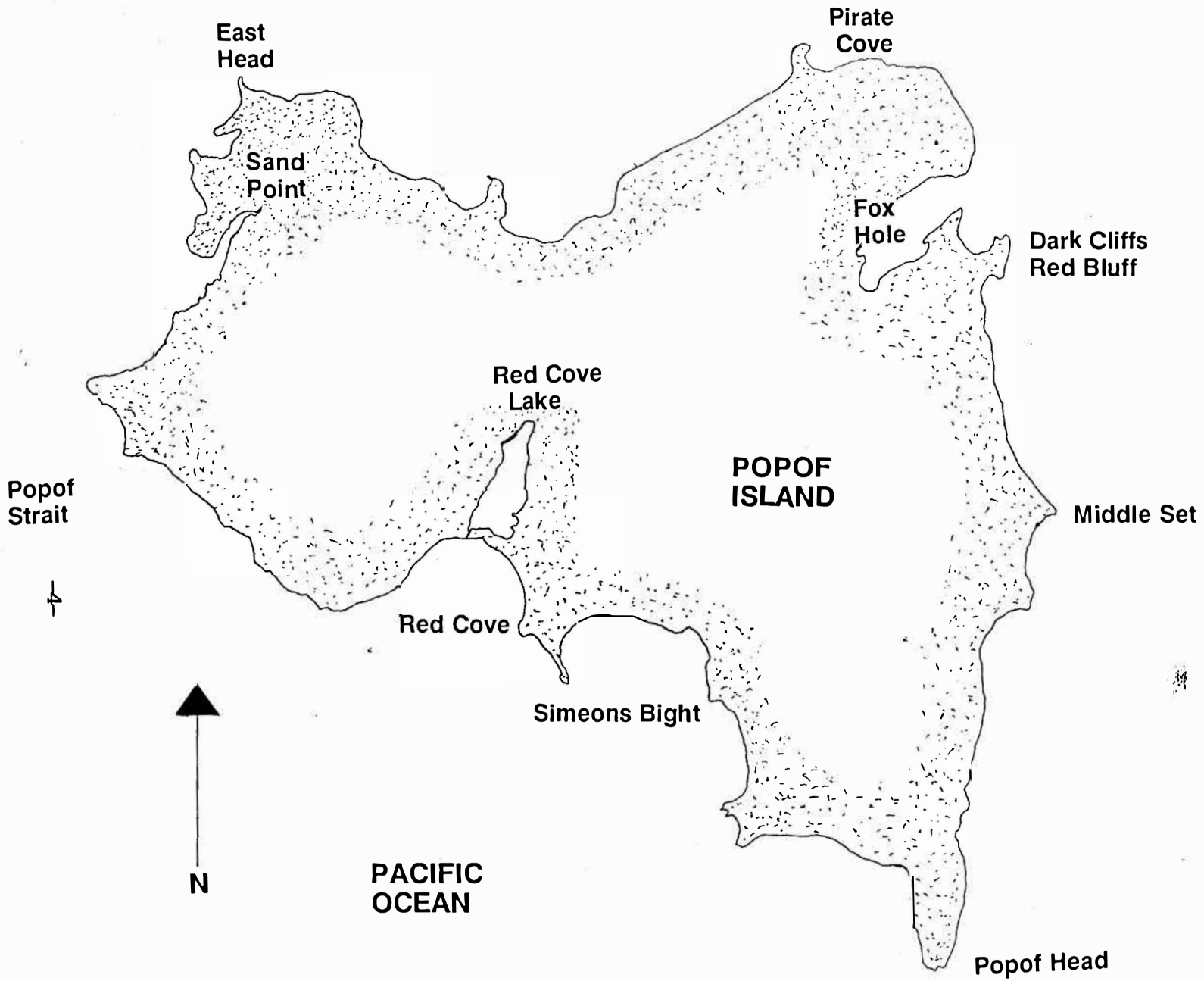

Figure 2. Map of Popof Island with the test fishing sites defined.

METHODS

In 1990, test fishing was standardized to purse seine gear making 20 minute sets and fully pursing the gear. The test fish project used commercial purse seines that are 250 fathoms in length and 375 meshes in depth. The seine mesh is 3 1/2 inches except the first 25 meshes above the lead line is usually seven inch mesh. The test fish project and commercial fishermen do not use leads in the Shumagin Islands Section. Sites used to set the gear included: Popof Head, Middle Set, and Red Bluff; additional sets were made if time allowed. If large numbers (greater than 1,000) of immature salmon were observed being gilled during any set, the set could be terminated prior to the 20 minute time limit. Each day a permit holder was randomly selected from a list of permit holders interested in the test fishery. The standard ADF&G short term vessel charter agreement between the State of Alaska and the vessel owner was used. The permit holder supplied all necessary fishing material and crew, while ADF&G supplied a biologist to count and identify by species the number of immature and mature salmon per set. Immature salmon were defined as any salmon gilled in seine webbing and weighing less than three pounds per fish; this was also the weight below which buyers refused to pay for salmon. Mature salmon were sold to pay charter cost and immature salmon were dumped at sea unless they could be given away for subsistence use. During off-loading the mature catch was separated by species, counted, and weighed.

Prior to 1990 test fishing was not documented in detail. Although similar to current test fishing in sites fished and duration of sets, the pre-1990 test fishery differed in that a single vessel was chartered for the duration of the test fishery.

Catches were occasionally sampled from purse seine gear in the Shumagin Islands Section. Immature salmon gilled in seine web were randomly sampled. Since all catch sampling occurred before sorting within the fishing vessel and cannery, there was no preselection of immature salmon; although not tested, each sample was assumed to be representative of the by-catch within the Shumagin Islands Section. While this insured that samples were randomly selected from each fishing vessel sampled, the samples may not be characteristic of the population structure because the distribution of the population is unknown in the fishery.

Age was determined by examining scales (Bilton and Ricker 1965; Mosher 1968). Scales were removed from the preferred area, which was located on the left side of the salmon two rows above the lateral line in an area transacted by the posterior insertion of the dorsal fin to the anterior insertion of the anal fin (INPFC 1963). One scale was taken from each salmon. A microfiche reader was used to read an acetate impression of the scale (Clutter and Whitesel 1956). Ages were recorded in European notation in which the first digit is the number of winters the salmon spent in freshwater, and the second digit is the number of winters the salmon spent in the ocean (Mosher 1968). The total age is the sum of these two numbers plus one to account for the incubation time. The accuracy of age determination was not tested, but prior data on sockeye salmon indicate a 98% agreement rate between experienced readers (McCullough 1989).

Length measurements were taken from mid-eye to the fork of the tail using a caliper or meter stick measuring to the nearest 1 mm. Accuracy of a length

measurement was within ± 5 mm. Mean lengths were calculated from an unweighted composite of the data collected from the samples.

Gonad weight measurements were taken using a triple beam balance scale with 0.1 g gradations; weights were recorded to the nearest 0.1 g. Accuracy of a weight measurement was within ± 0.2 g. Mean weights were calculated from an unweighted composite of the data collected from the samples.

Sex compositions and sexual maturity were computed for each sample. Sex and sexual maturity was determined by internal observation of the gonads.

RESULTS AND DISCUSSION

1963 Season

On July 9, 1963, ADF&G reported that about 50% of the 16,000 salmon caught on July 5 was composed of small sockeye salmon (G. Davenport, Alaska Department of Fish and Game, Sand Point, personal communication). The salmon were reportedly gilled in the 3 1/2 inch web of purse seine gear but not in the 4 inch web. Some of these small salmon were examined by the Area Management Biologist, Glen Davenport, on July 6 and identified as immature sockeye salmon, full of feed, and stomach-burned by time of delivery in King Cove. Attempts to process the immature salmon were unsuccessful. Area processors subsequently agreed not to buy immature salmon in an attempt to move fishing vessels away from the problem areas. Fishermen continued fishing in problem areas and ADF&G closed the Southeastern District until most of the immature salmon migrated out of the area (July 11-14).

1968 Season

In 1968, Richard Guthrie, Assistant Area Management Biologist, in Sand Point was informed by several commercial fishermen of immature sockeye salmon in the Shumagin Islands on July 2, and that they increased in abundance through July 5 (R. Guthrie, Alaska Department of Fish and Game, Sand Point, personal communication). By July 5, up to 500 immature salmon per set were caught.

The fishery was closed through the weekend (July 6-7). On July 8, the fishery reopened with Mr. Guthrie aboard a purse seine vessel as an observer. While waiting to make a set, Mr. Guthrie observed other sets and estimated 220 immature salmon in one set, about 270 in a second set, and 700 in a third set. About 560 immature salmon were caught during the first set of the vessel he was aboard. The immature catch was about 90% sockeye salmon, and the remainder chinook and chum salmon. The Shumagin Islands Section was closed to all gear types on July 8.

From July 9-19, a daily test fishery was conducted. During the July 9 through July 16 test fishery, each set averaged 450 immature salmon, of which 90% were sockeye salmon and the remainder chinook and chum salmon. From July 17-19, the catch of immature salmon decreased to less than 50 per set, and by July 22 the catch was less than 10 per set (mostly chinook and chum salmon).

In a commercial opening on July 20, an average of 56 immature salmon per set were caught during the morning sets; with the average decreasing during the day. Observations on July 21-23 indicated a decreasing incidence of immature salmon, with only 10 per set caught on July 23. The mortality of the gilled salmon was estimated at about 95%.

A total of 160 immature sockeye salmon were sampled. The sample was 66% females and 34% males. Males averaged 348 mm in length and females 332 mm. Female egg skeins were about 1/4 inch wide and two inches in length. The sockeye were age 2.1 (88%), age 2.2 (3%), age 1.1 (7%), and age 1.2 (2%). Of 12 immature chinook salmon sampled, 92% were females and 8% were males; the 12 fish sample averaged 334 mm in length. Of 8 chum salmon sampled, 75% were females and 25% were males; average length was 346 mm.

In 1968, about 16 to 18 purse seine permit holders normally fished the Shumagin Islands Section, making about 60 sets per day. Mr. Guthrie estimated that if the fishery had not been closed 25,000 to 30,000 immature salmon per day would have been caught. The fishery was closed July 8-19, allowing an estimated 400,000 immature salmon to escape the fishery.

Mr. Guthrie reported that fishermen made sets up to two miles offshore and still found large numbers of immature salmon, although the immature salmon were not as abundant as inshore sets.

1969 Season

On July 8, 1969, Richard Guthrie monitored six fishing vessels at Popof Head. He observed seven sets and noted that the number of gilled immature salmon per set exceeded 200, with two sets catching more than 500 immature salmon. The Shumagin Islands Section was closed to commercial salmon fishing on July 9. On July 9, a test fishery was conducted using a commercial purse seine vessel and the usual vessel crew. One to two sets per day were made with the net held open for 20 minutes each set, but less when there were indications were that an excessive number of immature salmon would be caught. Results of the test fishery are as follows:

Date	Number Sets	Time Per Set (min)	Number Immature Salmon Per Set	Total Number Adults
July 9	2	20	371	30
July 10	1	20	450	68
July 11	1	20	2,500	190
July 12	1	25	770	55
July 13	1	15	1,100	40
July 14	1	10	740	120
July 15	1	10	320	200
July 16	2	20	157	78
July 17	2	10, 15	140	287
July 18	2	20	115	220
July 19	2	20	29	44

In 1969, the Shumagin Islands Section was reopened to commercial salmon fishing on July 19. Observations and test fishing on July 19 indicated that about 20 to 25 immature salmon per set were caught. These catch levels justified reopening the commercial fishery (reopened the evening of July 19). Observations by ADF&G on July 20-23 indicated that the number of gilled salmon continued to decrease. Samples of immature salmon showed that an estimated 96% of the fish were sockeye salmon and the remainder were chinook and chum salmon. The estimated age of immature sockeye salmon was 90% age 2.2 and 2.1; on July 17 age 1.1 comprised 33% of the catch and on July 18 age 1.1 comprised 17% of the catch.

In 1969, an average of 17 purse seine vessels were involved in the Shumagin Islands Section fishery.

1974 Season

In 1974, immature salmon in the Shumagin Islands Section were a concern from July 11-22. ADF&G was informed of immature salmon in the commercial catch on July 11 (B. De Jong, Alaska Department of Fish and Game, Sand Point, personal communication). One commercial fisherman reported a catch of over 1,000 immature sockeye salmon per vessel at Popof Head. The fisherman also noted that prior to July 11, catches of immature salmon were not significant. On July 11, seven purse seine permit holders were fishing the Popof Head area. On July 12, an ADF&G observer aboard a purse seine vessel reported that large numbers of immature salmon were in the Popof Head to Red Bluff area, both inshore and offshore; adult salmon catches were low, averaging about 60 per set. The Shumagin Islands Section was closed to commercial salmon fishing from July 12-15.

Test fishing on July 15 resulted in a catch of 73 immature salmon and 60 adult salmon. Observations by ADF&G were that most of the immature salmon were gilled in the first three fathoms of webbing below the cork line and in the ends of the net in the last 10 fathoms. Three sets were made during the test fishery; a total of 159 immature and 220 mature salmon were caught. The immature salmon were estimated to be 97% sockeye salmon.

Fishermen also reported immature salmon at Swedania Point, with a catch of 40 immature salmon in one set (estimated total catch of 500 for the day); two purse seine permit holders reported a few immature salmon at Fox Bay (estimated total catch of 100 for the day).

The Shumagin Islands Section reopened to commercial salmon fishing on July 16, and the catch of immature salmon decreased. During the evening of July 17, immature salmon again moved into the Popof Head area in abundance similar to the July 12 catches. The Shumagin Islands Section was again closed to commercial salmon fishing from July 18-21. The area was reopened on July 22 as a commercial test fishery, and about 100 to 200 immature salmon per set were observed. Fishermen reported that sets made near slack tide had caught immature salmon in significant numbers and an estimated 1,000 adult salmon per set. Fishermen reported that they had made no effort to pick the gilled immature salmon out of the seines, and sets after slack tide had produced a range of zero to 21 immature salmon per set with an average of eight per set.

From July 11-22, ADF&G estimated that 21,000 immature salmon were caught and due to the closures 35,000 escaped the fishery.

1979 Season

In 1979, large numbers of immature salmon were reportedly gilled in seine gear along the east side of Popof Island during June 25-26. On June 25, ADF&G had no personnel in the Sand Point area. On June 26, Tyler Gilmer, the Assistant Area Management Biologist, returned to Sand Point to assess the catch of immature salmon. The commercial fishery along the east shore of Popof Island was closed after June 26 due to excessive catches of immature salmon.

Following the closure of the east shore of Popof Island, most purse seine permit holders quit fishing the Shumagin Islands Section; however, four permit holders continued to fish the southeast shore of Unga Island. These fishermen caught substantial numbers of immature salmon on June 27. After June 27, the entire Shumagin Islands Section was closed to commercial salmon fishing.

The occurrence of immature salmon in the Shumagin Islands Section during June was not anticipated by ADF&G because in prior years immature salmon had not migrated into the area until July.

Due to vessel charter problems (vessels chartered by ADF&G had to be Coast Guard approved), ADF&G allowed short commercial fishing periods, monitored by ADF&G personnel, to determine the abundance of immature salmon in the fishery.

On July 4, a six hour opening was allowed, but a substantial number of immature salmon were caught and the fishery was not extended. On July 9, a second test fishery was allowed; immature salmon were not caught in substantial numbers and the fishery returned to normal periods. No other substantial numbers of immature salmon were observed by ADF&G or reported by fishermen during 1979.

After 1979, a regulation was passed allowing gill net fishermen to continue fishing in the Shumagin Islands Section when it became necessary to close the area to purse seine gear due to the presence of immature salmon.

1989 Season

In late June of 1989, large numbers of immature sockeye salmon were reported in the Shumagin Islands Section. A Department of Public Safety vessel monitoring the July 6-7 commercial salmon fishing period noted 20 to 25 immature salmon harvested per set. On July 12, about 200 immature salmon per set were observed by ADF&G, resulting in a purse seine gear closure in the Shumagin Islands Section fishery 24 hours earlier than originally scheduled. Test fishing results indicated a high number of immature salmon present through July 22. Test fishing on July 23 indicated a decreasing trend in the catch of immature salmon. The Shumagin Islands Section was reopened to purse seine gear on July 25. On July 25, about 15 immature salmon per set were observed, and purse seine gear was allowed to continue fishing during open periods for the remainder of the commercial salmon season. During the purse seine gear closure, the Shumagin Islands Section was open to set gill net permit holders on July 13-14, and 20-21.

From 1975 to 1989 the species composition of the immature catch changed. Prior to 1975, about 90% of the immature salmon caught in the Shumagin Islands Section were sockeye salmon. After 1988, the immature catch was about 50% sockeye and 50% chum salmon.

The following two tables list data from immature sockeye salmon harvested in 1989:

Estimated age composition, in percent, of immature sockeye salmon catches from the Shumagin Islands Section, 1989.

Sample Size	Ages 1.1	1.2	2.1	2.2	3.1	Total
54	5.6	5.6	83.3	1.9	3.7	100.0

Estimated length (mm; mid eye to tail fork) by age of immature sockeye salmon catches from the Shumagin Islands Section, 1989.

	Ages 1.1	1.2	2.1	2.2	3.1	Total
Mean Length	357	420	362	430	393	368
SE	7	8	2	-	3	3
Range	350-370	405-430	320-400	430	390-395	320-430
Sample Size	3	3	44	1	2	53

1990 Season

During the February 1990 Alaska Board of Fisheries meeting a discussion on the problem of immature salmon in the Shumagin Islands Section resulted in a policy statement by the Alaska Board of Fisheries (Department of Fish and Game policy on the incidental harvest of immature salmon in the South Peninsula area of the Alaska Peninsula/Aleutian Islands Area; ADF&G 1990). The policy gives ADF&G authority to close by emergency order areas of the South Peninsula when the incidental by-catch of immature salmon is considered excessive. ADF&G will consider average immature salmon caught per set, fleet distribution, and historical dates of occurrence. ADF&G will also utilize results from subsistence and commercial openings to evaluate the abundance of immature salmon and their possible presence in future openings. ADF&G was given the authority to open all areas in the South Peninsula to gill net gear during fishing periods when

the seine fishery is closed by emergency order due to the presence of immature salmon.

In early July of 1990, subsistence fishermen reported catches of immature salmon along the east shore of Popof Island. A test fishery was established with chartered purse seine permit holders making at least one-20 minute set at each test site (Popof Head, Middle Set, and Red Bluff; Figure 2). Additional sets were made if time permitted. To standardize the test fishery, ADF&G chartered only those vessels with full purse seine gear rather than half pursing the gear. The July 3 test fishery indicated that the average catch of immature salmon per set was two sockeye and six pink salmon (Table 1). Most immature salmon were gilled at mid-body and had to be removed by hand from the web. The July 5 test fishery resulted in an average immature catch of six sockeye, six pink, and nine chum salmon. The catch of immature salmon from the test fishery did not warrant closure of the area to purse seine gear and the fishing periods on July 6 and July 9-10 did not produce substantial numbers of immature salmon in the commercial catch. The next fishing period on July 13-14 resulted in an increased catch of immature chum salmon. The average weight of chum salmon in the catch from both the Shumagin Islands Section and the South Unimak area decreased substantially from the July 9-10 fishing period. In the Shumagin Islands Section, the average weight of chum salmon was 7.3 pounds on July 9 and decreased to 3.7 pounds on July 13.

The July 16 test fishery indicated that the average catch of immature salmon per set was 315 salmon. The July 17 test fishery resulted in an average immature salmon catch of 377 salmon per set. Based on these results the Shumagin Islands Section was closed to purse seine gear during the July 18-19 fishing period. The test fishery on July 20 resulted in an average immature salmon catch of 34 salmon per set. The July 21 test fishery resulted in an average immature salmon catch of 12 sockeye and 43 chum salmon. The results did not warrant continued closure of the Shumagin Islands Section to purse seine gear. On July 24, a fishing period for July 23-25 was announced. Observations by ADF&G on July 23 from five sets indicated that about 150 immature salmon per set were caught. These salmon were about 39% sockeye and 61% chum salmon. The Shumagin Islands Section were again closed to purse seine gear on July 23. The immature salmon were believed to have returned to the Shumagin Islands Section due to strong Southeast winds on July 22. A test fishery on July 25 indicated the average catch of immature salmon per set was six salmon. The Shumagin Islands reopened to purse seine gear on July 25 and no further purse seine closures were required to protect immature salmon. The Shumagin Island Section was closed to purse seine gear from July 15 until 5:00 AM, July 23 and from 10:30 PM, July 23 until 4:00 PM, July 25.

Large numbers of immature chum salmon were also reported in the commercial catch from the Otter Cove and Sanak Island Sections of the Unimak District on July 6. Based on reports from purse seine fishermen; these sections were closed to purse seine gear from July 6-31.

Closure of the Shumagin Islands Section affected about 40 to 50 purse seine permit holders, while the Otter Cove and Sanak Island Sections closure affected about 9 purse seine permit holders. About 50% of the fishermen affected by the closure stayed in port while the remainder fished other open areas. Additional effort in areas open to purse seine gear caused longer waiting lines at preferred fishing sites and smaller individual catches.

Table 1. Shumagin Islands Section July salmon test fish catch results, by set, date, and location, 1990-91.

Year/ Date	Set	Number of Adult Salmon						Immature Salmon						
								Number					Percent	
		Chinook	Sockeye	Coho	Pink	Chum	Total	Chinook	Sockeye	Pink	Chum	Total	Sockeye	Chum
1990														
July 3	Popof Head	0	53	0	25	238	316	0	1	14	0	15	6.7	0.0
	Popof Head	0	45	0	16	117	178	0	3	7	0	10	30.0	0.0
	Popof Head	0	80	0	11	202	293	0	2	1	0	3	66.7	0.0
	Popof Head	0	68	0	7	115	190	0	2	0	0	2	100.0	0.0
	Average	0	62	0	15	168	244	0	2	6	0	8	26.7	0.0
July 5	Popof Head	0	49	0	31	318	398	0	13	14	17	44	29.5	38.6
	Popof Head	0	7	0	7	48	62	0	2	0	3	5	40.0	60.0
	Middle Set	0	20	0	12	114	146	0	3	4	7	14	21.4	50.0
	Average	0	25	0	17	160	202	0	6	6	9	21	28.6	42.9
July 16	Popof Head	0	206	273	160	321	960	8	222	16	61	307	72.3	19.9
	Cape Devine	0	88	117	68	138	411	6	198	1	117	322	61.5	36.3
	Average	0	147	195	114	230	686	7	210	9	89	315	66.8	28.3
July 17	Popof Head	6	97	206	303	387	999	11	261	0	346	618	42.2	56.0
	Red Bluff	2	32	68	101	129	332	7	94	2	155	258	36.4	60.1
	Middle Set	2	33	69	101	129	334	2	61	1	191	255	23.9	74.9
	Average	3	54	114	168	215	555	7	139	1	231	377	36.8	61.2
July 20	Popof Head	3	41	108	149	73	374	1	6	0	9	16	37.5	56.3
	Middle Set	2	24	65	90	44	225	1	14	0	15	30	46.7	50.0
	Red Bluff	4	57	151	209	102	523	2	39	0	16	57	68.4	28.1
	Red Bluff	2	41	108	149	73	373	0	14	0	19	33	42.4	57.6
	Average	3	41	108	149	73	374	1	18	0	15	34	53.7	43.4

-Continued-

Table 1. (page 2 of 5)

Year/ Date	Set	Number of Adult Salmon						Immature Salmon						
								Number					Percent	
		Chinook	Sockeye	Coho	Pink	Chum	Total	Chinook	Sockeye	Pink	Chum	Total	Sockeye	Chum
July 21	Red Bluff	0	8	13	66	34	121	0	14	0	71	85	16.5	83.5
	Red Bluff	1	22	36	184	95	338	0	16	0	71	87	18.4	81.6
	Middle Set	0	13	22	112	58	205	0	7	0	0	7	100.0	0.0
	Popof Head	1	35	59	296	152	543	0	10	0	29	39	25.6	74.4
	Average	1	20	33	165	85	302	0	12	0	43	55	21.6	78.4
July 25	Popof Head	0	0	31	124	16	171	0	3	0	8	11	27.3	72.7
	Middle Set	0	0	56	79	11	146	0	2	0	3	5	40.0	60.0
	Cape Devine	0	0	59	194	30	283	0	0	0	0	0	0.0	0.0
	Average	0	0	49	132	19	200	0	2	0	4	5	31.3	68.8
August 13	Kelly's Rock	0	48	57	279	46	3	0	3	0	1	4	75.0	25.0
	Kelly's Rock	0	83	106	429	38	656	1	1	0	1	3	33.3	33.3
	Popof Head	0	18	21	279	31	349	0	2	0	1	3	66.7	33.3
	Red Bluff	0	7	41	188	20	256	0	2	0	1	3	66.7	33.3
	Cape Devine	0	3	34	186	7	230	0	1	0	3	4	25.0	75.0
	Elephant Rock	0	16	8	661	18	703	0	0	0	2	2	0.0	100.0
	Average	0	29	45	337	27	437	0	2	0	2	3	47.4	47.4
1991														
July 1	Popof Head							0	260	0	91	351	74.1	25.9
	Middle Set							0	230	0	57	287	80.1	19.9
	Red Bluff							4	236	0	53	293	80.5	18.1
	Average	3	797	2	559	260	1,620	1	242	0	67	310	78.0	21.6

-Continued-

Table 1. (page 3 of 5)

Year/ Date	Set	Number of Adult Salmon						Immature Salmon						
								Number					Percent	
		Chinook	Sockeye	Coho	Pink	Chum	Total	Chinook	Sockeye	Pink	Chum	Total	Sockeye	Chum
July 2	Popof Head							0	399	0	127	526	75.9	24.1
	Middle Set							0	871	0	87	958	90.9	9.1
	Red Bluff							0	572	0	118	690	82.9	17.1
	Average	2	987	4	829	209	2,031	0	614	0	111	725	84.7	15.3
July 3	Popof Head							0	238	0	63	301	79.1	20.9
	Middle Set							1	678	0	2	681	99.6	0.3
	Red Bluff							0	823	0	90	913	90.1	9.9
	Average	17	451	6	994	326	1,794	0	580	0	52	632	91.8	8.2
July 4	Popof Head							0	552	0	37	589	93.7	6.3
	Middle Set							5	487	0	100	592	82.3	16.9
	Red Bluff							7	332	0	440	779	42.6	56.5
	Average	6	380	16	645	849	1,897	4	457	0	192	653	69.9	29.4
July 5	Popof Head							0	272	0	331	603	45.1	54.9
	Middle Set							2	392	0	125	519	75.5	24.1
	Red Bluff							2	56	0	66	124	45.2	53.2
	Average	6	112	20	495	405	1,038	1	240	0	174	415	57.8	41.9
July 6	Popof Head							2	861	0	751	1,614	53.3	46.5
	Middle Set							1	490	0	239	730	67.1	32.7
	Red Bluff							0	235	0	67	302	77.8	22.2
	Average	10	256	12	523	272	1,073	1	529	0	352	882	59.9	39.9
July 8	Popof Head							5	280	0	277	562	49.8	49.3
	Middle Set							3	222	0	132	357	62.2	37.0
	Red Bluff							3	155	0	191	349	44.4	54.7
	Average	14	75	38	44	287	457	4	219	0	200	423	51.8	47.3

-Continued-

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Table 1. (page 4 of 5)

Year/ Date	Set	Number of Adult Salmon						Immature Salmon						
								Number					Percent	
		Chinook	Sockeye	Coho	Pink	Chum	Total	Chinook	Sockeye	Pink	Chum	Total	Sockeye	Chum
July 9	Popof Head							5	314	0	248	567	55.4	43.7
	Middle Set							4	73	0	23	100	73.0	23.0
	Red Bluff							0	73	0	125	198	36.9	63.1
	Average	2	21	7	13	53	96	3	153	0	132	288	53.2	45.8
July 10	Popof Head							4	116	0	10	130	89.2	7.7
	Middle Set							4	42	0	5	51	82.4	9.8
	Red Bluff							3	79	0	192	274	28.8	70.1
	Average	3	36	49	36	42	166	4	79	0	69	152	52.1	45.5
July 11	Popof Head							9	311	0	13	333	93.4	3.9
	Middle Set							1	205	0	4	210	97.6	1.9
	Red Bluff							17	140	0	97	254	55.1	38.2
	Average	3	87	47	75	56	267	9	219	0	38	266	82.3	14.3
July 12	Popof Head							12	699	0	963	1,674	41.8	57.5
	Middle Set							8	169	0	47	224	75.4	21.0
	Red Bluff							10	70	0	50	130	53.8	38.5
	Average	5	63	53	118	119	357	10	313	0	353	676	46.3	52.3
July 13	Popof Head							20	210	0	281	511	41.1	55.0
	Middle Set							9	92	0	16	117	78.6	13.7
	Red Bluff							10	108	0	41	159	67.9	25.8
	Average	21	149	188	614	294	1,266	13	137	0	113	262	52.1	42.9
July 14	Popof Head							15	139	0	93	247	56.3	37.7
	Middle Set							15	335	0	100	450	74.4	22.2
	Red Bluff							20	454	0	336	810	56.0	41.5
	Average	17	212	117	1,201	245	1,792	17	309	0	176	502	61.6	35.1

-Continued-

Table 1. (page 5 of 5)

Year/ Date	Set	Number of Adult Salmon						Immature Salmon						
								Number					Percent	
		Chinook	Sockeye	Coho	Pink	Chum	Total	Chinook	Sockeye	Pink	Chum	Total	Sockeye	Chum
July 16	Popof Head							28	33	0	253	314	10.5	80.6
	Middle Set							8	40	0	142	190	21.1	74.7
	Red Bluff							5	149	0	170	324	46.0	52.5
	Average	7	52	206	291	377	932	14	74	0	188	276	26.8	68.2
July 17	Popof Head							33	207	0	247	487	42.5	50.7
	Middle Set							7	136	0	105	248	54.8	42.3
	Red Bluff							12	185	0	226	423	43.7	53.4
	Average	8	40	82	233	143	506	17	176	0	193	386	45.6	49.9
July 18	Popof Head							8	77	0	73	158	48.7	46.2
	Middle Set							4	6	0	3	13	46.2	23.1
	Red Bluff							1	16	0	31	48	33.3	64.6
	Average	4	28	140	126	31	329	4	33	0	36	73	45.2	48.9
July 19	Popof Head							14	26	0	47	87	29.9	54.0
	Middle Set							11	4	0	13	28	14.3	46.4
	Red Bluff							3	18	0	12	33	54.5	36.4
	Average	20	45	435	281	124	905	9	16	0	24	49	32.4	48.6

In 1991, only immature salmon per set were counted, mature salmon were estimated.

PC7

1991 Season

In late June, subsistence fishermen reported immature salmon in waters along the east side of Popof Island. ADF&G chartered purse seine vessels from July 1-19 to determine the abundance of immature salmon. Test fish results from the Shumagin Islands were used as an indication of the presence of immature salmon in the South Central, Southwestern, and Unimak Districts of the Alaska Peninsula Management Area and the Western and Perryville Districts of the Chignik Management Area. Portions of the South Central, Southwestern, and the Unimak District and portions of the Western and Perryville Districts were, closed at times, to purse seine gear due to the presence of immature salmon. In 1991, the presence of immature salmon was wide spread, with reported catches from Kodiak Island to Unimak Island.

During commercial salmon periods in South Peninsula waters on July 6, July 8-9, July 10, and July 15-16, only gill net gear was allowed in the Shumagin Islands Section and the Unimak District. Test fishing on July 19 indicated that most immature salmon had migrated through the Shumagin Islands Section (average catch was 49 immature salmon). Purse seine fishermen were allowed to fish the section during the opening of July 21-23 (Table 1). On July 21, ADF&G personnel observed several commercial purse seine sets near Popof Island and reported that the number of immature salmon per set was less than five salmon.

Test fish results indicated that from July 1-6, most of the immature salmon caught were sockeye salmon, (59.9 to 91.8%). After July 6, the catch of immature sockeye and chum salmon was nearly equal.

The catch of immature salmon in the commercial salmon fishery for the rest of the salmon season was minor (probably averaging less than 1 immature salmon per set) and did not warrant further closures of South Peninsula waters to purse seine gear.

ADF&G observed that during the day, most of the immature salmon were caught in the upper 25 feet of the purse seine. All test sets were made close to shore, at some sites within 30 feet of the beach. During days of good visibility, immature salmon could be seen jumping off-shore at least one mile from the beach (M. Stopha, Alaska Department of Fish and Game, personal communication). Although no sets were made offshore to compare near-shore and off-shore sets, it is likely that substantial numbers of immature salmon would still be caught offshore.

During the 1991 purse seine closures, discussions between fishermen and ADF&G resulted in an agreement that fishermen (with ADF&G observers aboard) could experiment with net modifications during the 1992 season in an attempt to catch adult salmon while not restricting the migration of immature salmon. If a change in gear produced the desired results, purse seine gear regulations could be passed through the Alaska Board of Fisheries to allow modifications. One gear modification used in Puget Sound Washington uses four inch web in the upper strip of the purse seine to catch adult salmon while giving unrestricted passage to immature coho salmon. Board of Fish action during the November 1991 meeting closed most of the South Peninsula for all gear types from July 6-19. Although the closure was based on considerations other than immature salmon catches, the new regulation should solve most immature salmon problems; immature salmon

usually migrated out of the Shumagin Islands waters by July 23. With the closure in effect net modifications are not necessary.

The Shumagin Islands and Sanak Island Sections were closed to purse seine gear due to immature salmon from July 6 to until July 21. The Otter Cove Section and portions of the Volcano Bay and Ikatan Bay Sections were similarly closed from July 15 until July 21.

Closure of the Shumagin Islands Section impacted about 40 to 50 purse seine permit holders, while the Otter Cove and Sanak Island Sections impacted about 9 purse seine permit. In the Alaska Peninsula Management Area about 50% of the purse seine fishermen remained in port, and the remainder fished open areas.

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Regional Operational Plan CF.4K.2016.06

The Shumagin Islands Immature Salmon Test Fishery Operational Plan, 2016–2018

by

Charles W. Russell

April 2016

Alaska Department of Fish and Game **Divisions of Sport Fish and Commercial Fisheries**

commercial salmon fishery after June 30 in South Alaska Peninsula waters. The regulation established the test fishery and clarified the definition of immature salmon.

OBJECTIVES

BIOLOGICAL

- Provide a timely index of the immature salmon abundance within the marine waters in the vicinity of the Shumagin Islands;
- reduce the potential for large catches of immature salmon, thus maximizing future escapement and harvest; and
- collect biological data from test fishery-caught salmon.

FISCAL

- Secure revenue through the sale of fish caught during the test fishery to cover the costs of the daily charter.

METHODS

In April of 2016–2018, ADF&G will distribute a pre-season letter and request for quotation (RFQ) seeking individuals interested in working with the department in conducting test fishery operations. Interested parties are asked to submit a bid based on a percentage, not to exceed 70% of the adult salmon harvested, that they would accept as payment for the charter. Selection of the test fish charter will go to the lowest bidder. In the case of multiple "low" bids, charter selection will be awarded to the low bid that was received first. The standard department short-term vessel charter agreement between the State of Alaska and the vessel owner will be used (Appendix A). Skippers will provide necessary crew to operate the boat and gear, fuel and lubricants, and other supplies needed for daily operation of the vessel. Vessel operators must have a current Area M salmon purse seine permit. Protection (hull) and Indemnity insurance including crew exposure in the amount of at least $300,000 is required. All vessels must contain a refrigerated sea water (RSW) system to chill the catch.

Immature salmon are defined as Chinook, sockeye, coho, and chum salmon observed to be gilled in seine webbing (5 AAC 09.366(i)). All salmon harvested are the property of the State of Alaska and will be sold to cover charter costs. During off-loading, the mature salmon will be separated by species, and weighed. The number of mature salmon, by species, will be determined from the average weight of a sample of fish.

SCHEDULE AND DELIVERABLES

Department staff will determine when test fishing occurs based on management requirements. Since 1998, the test fish program has been conducted in early July. However, prior to early July department staff will monitor the seine fishing fleet (via department vessel) for immature salmon harvests.

RESPONSIBILITIES

Department staff will meet with the skipper of the scheduled chartered vessel prior to departure from Sand Point. The vessel will depart at an agreed upon time with at least one department

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1/4/2023

Chairwoman Carlson-Van Dort and members of the board,

I especially oppose 105 and 132.

I support 106, 109, 118, 133, 134, 135, 136, 137, 138, 139, 140, 143, 148, 149, 150 in some combination of as they all would improve the returns of Chignik sockeye and chinook salmon and/or improve the chances of a sustainable the fishery in Chignik. In 2022 the escapement improved to where the runs can start improving thanks in part to the self-imposed agreement to restrict fishing in the S. Pen. But we need those conservation efforts to have more stability than a year-to-year basis.

In Chignik, we would like to fully utilize all the available nursery habitat for sockeye. Lowering the escapement to the upper lake does the opposite of this. The upper lake should receive the larger escapement and if needed, the salmon will immigrate downstream to the two lower rearing habitats (Chignik Lake and Chignik Lagoon). Rest assured, the fry from the lower lake do not migrate upstream to use the abundant food resources in the upper Black Lake. At the point in escapement where enough spawners and thus juvenile sockeye are not deposited in Black Lake, the food resources will then be used to strengthen the remaining (and abundant) resident competitor species Stickleback.

This laissez-faire management approach offered recently by the department where Black Lake and Chignik Lake sockeye will be managed as one escapement is ridiculous if the State is still concerned with managing for the sustained yield of the resource. You can't sustain fisheries without fish and you can't sustain fish without adequate escapement levels to maximize returns. The new broader escapement range confirms that the management doesn't identify what is happening within the system. No studies have been conducted since the unforeseen collapse in 2018 in Chignik. Under this new escapement regime, little escapement will become acceptable purely because it exists (again, a laissez-faire approach).

Some evidence for why Proposal 105 and 132 and the merging Chignik's runs and lowering escapement ranges that the proposals were predicated should be opposed is offered below:

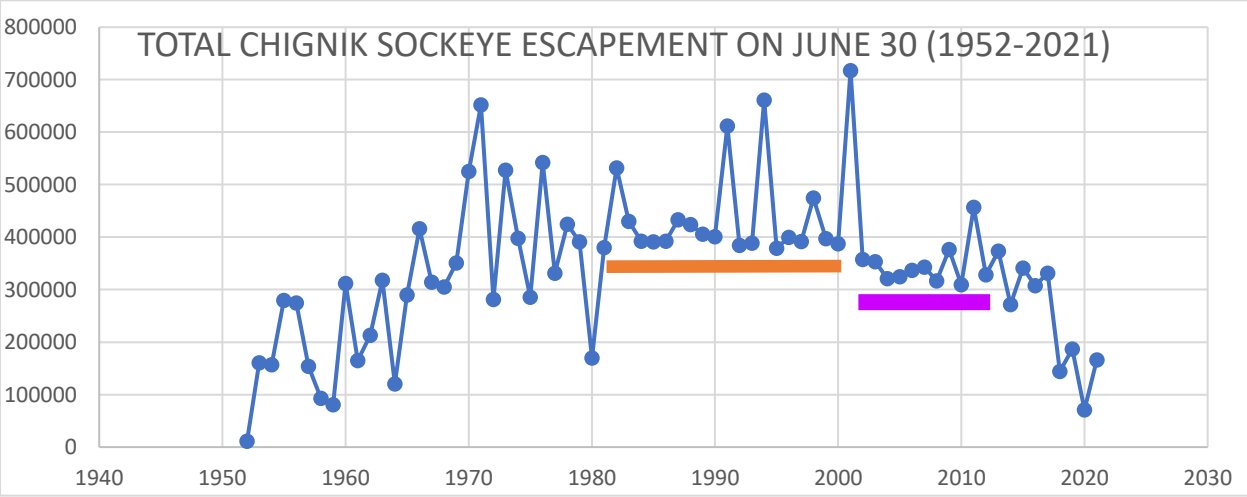
P288

The evidence presented in this report has strongly indicated that the major factor in the severe decrease in sockeye salmon returns to the Chignik lakes since the 1940's is inadequate and unbalanced escapements. The low level of escapements to Black Lake has resulted in a lacustrine equilibrium in which the non-sockeye species are ecologically much more prominent than in the pre-1940's. This situation may not change until the escapement of Black Lake stocks is increased to a sustained level of about 411,000 (467,000 escapement of early-spawning stocks). Under the ecological conditions thus created the total return of Black Lake stocks (the economically most important segment of the Chignik run) should almost triple in numbers.

PELAGIAL ECOLOGY AND CARRYING CAPACITY OF SOCKEYE SALMON IN THE CHIGNIK LAKES, ALASKA, David Narver 1966, p.288

Furthermore, in a pelagial ecosystem dominated primarily by sockeye, the stability may be considerably lower than a multispecies ecosystem as in the present Black Lake pelagial zone. Two or more consecutive years of low sockeye escapements could again result in a substantial increase in the non-sockeye species in Black Lake. But the occasional single year of low escapement would probably not be serious; most of the non-sockeye species mature at age II and thus the populations are not resilient enough to take advantage of low sockeye abundance in one year.

PELAGIAL ECOLOGY AND CARRYING CAPACITY OF SOCKEYE SALMON IN THE CHIGNIK LAKES, ALASKA, David Narver 1966, p.287



A MINIMUM 400,000 EARLYRUN ESCAPEMENT WAS THE LOWEST TARGET IN THE 80'S AND CONTINUED IN THE 90'S

350,OOO ESCAPEMENT WAS THE EARLY RUN TARGET FROM 2002 THRU APPROXMATELY 2012 IN CHIGNIK

The chart above shows a shift in escapement management from 2002 and the decline there after in June escapements. The decline in productivity, recently identified by the department from 1998-2013, however, aligns with the returning sockeye affected by the 2004 changes in the South Pen that had been implemented. The changes in 2004 such as opening the Dolgoi area, fishing effort shifting to the Shumagins after GHL removal, and impacts of increased hours fished in the South Pen with few to no windows can be identified by the lower productivity of Chignik sockeye seen by the Department in R/S . The 1998 spawners aren't identified until they return (primarily in 2003 and 2004).

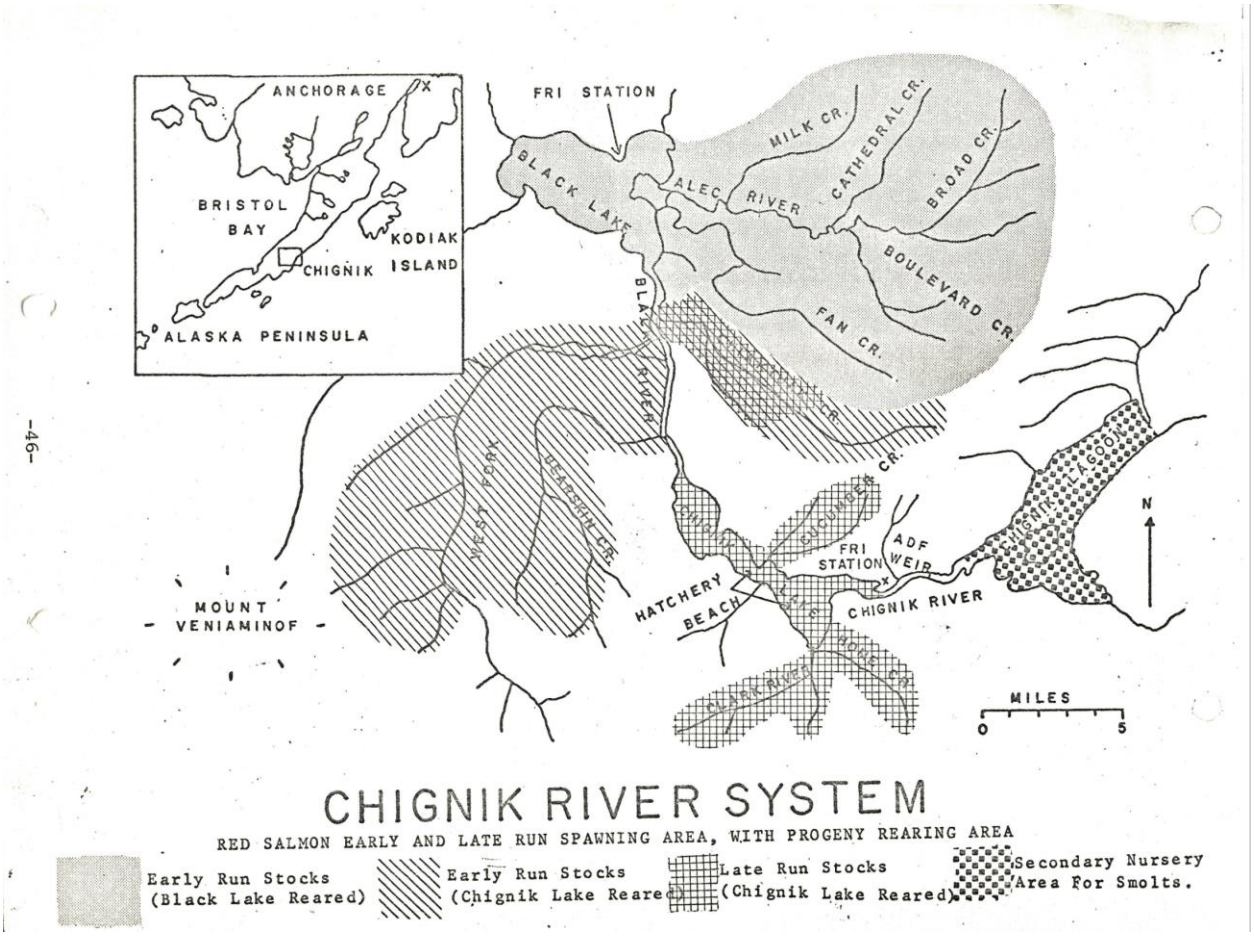
I also oppose Proposal 105 and 132 as they also would set a concerning precedence for future BOF stock declarations where management can simply moot the determination by changing escapement values .It will also likely prolong any recovery of the early run if not make it impossible to determine any recovery.

I oppose 132 because it changes language and threshold figures to begin fishing earlier thus becoming far less prescriptive and even somewhat subjective. Also, three escapements in the South Peninsula fishery had their escapements recently lowered (lower bounds) making it easier to have fisheries, thus impacting migrating stocks evermore:
Orzinski lowered by 1,000.
Mortensen Lagoon lowered by 1,800.
Thin Point Lake lowered by 5,000.

I oppose 130, 131,142,144,145,146,147,151, and,152. These would all be detrimental to Chignik salmon recovery and any community recovery hoped for in the Chigniks.

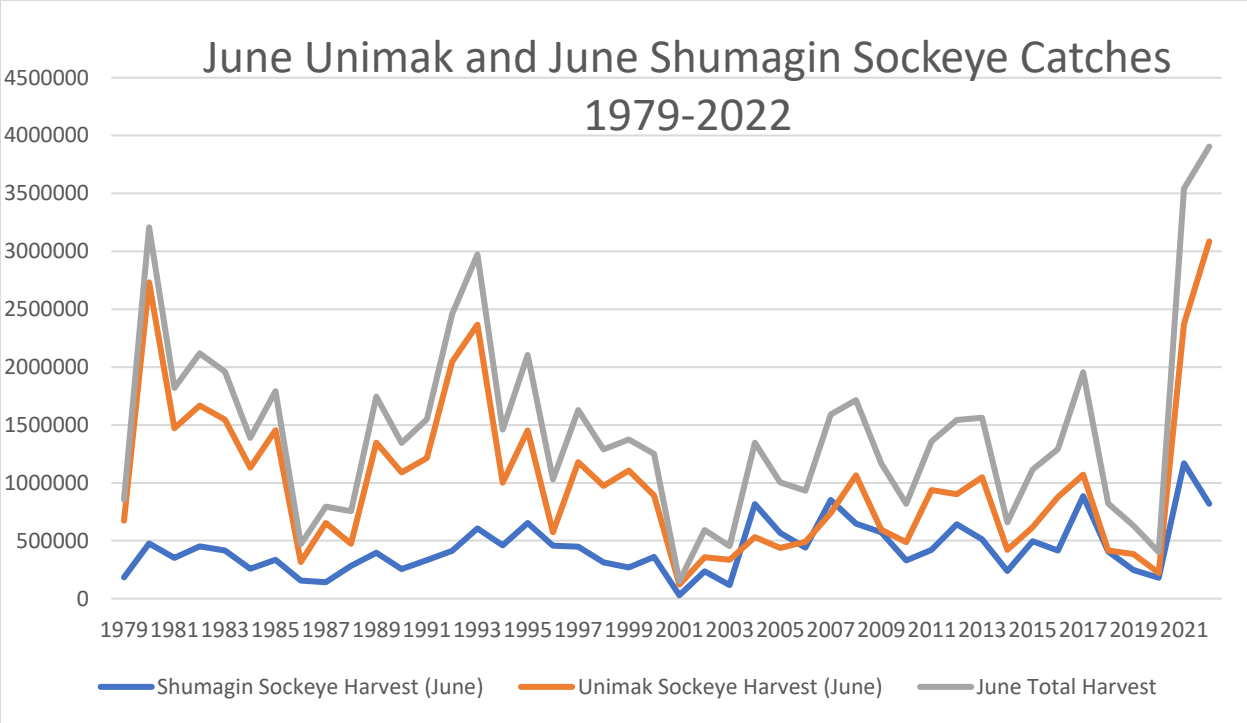
I support 106 because it would help return our management back to a historically precedented June level where early escapements to Black Lake were considered important in getting spawners back to all to all the Black Lake Rivers (Alex, Fan, Milk, Cathedral, Broad, and Boulevard Creeks) before a fishery took place.

Interestingly, the map below even identified the lagoon as a secondary nursery area clear back in 1967. Narver, Parr, and Dalberg had studied the Chignik Lakes for well over a decade and their findings are well documented. Their conclusions, acted upon, brought back the run strength in Chignik after it had depressed in the 50's and 60's. If their complete studies were embraced instead of cherry picked, interception would be the only factor needing correction. Please don't let management direct us farther from these truths. I purchased a boat and permit in 1991, believing that the State would protect the salmon runs but instead, it seems it has disregarded, misconstrued and ignored the foundational basics in the Chignik lake system.



1967 Chignik Area Annual Report, p. 46

I strongly support Proposal 135 as it focuses on returning a modified form of historical sideboards on an interception fishery literally next door to Chignik. As time-and-area and chum cap regulations come and go, Chignik stocks becomes vulnerable as Area M fishes more heavily and nearer to Chignik. When the original GHL was in place, it followed historical percentages of catch in Unimak vs Shumagins with Unimak historically having the greater level of salmon catch. But the GHL was deemed unnecessary and was removed because, at that time, there were other regs restricting the fleet that were considered enough. But the regs didn't last long and without the GHL, soon catching shifted to the Shumagins, much to the detriment of migrating Chignik stocks. With the Black Lake run struggling to rebuild and the 5 reliant Chignik communities devastated, having this as a sideboard (or even reinstating the old GHL) would alleviate random fluctuations of increased fishing pressure in the Shumagins from year to year. Also, Proposal 135 is able to work in conjunction with any necessary time and area regulations the Board may see fit to implement or change as years go by.



I support 150 because the Dolgoi area wasn't even a fishery before 2004 in June. It has negatively impacted Chignik salmon. WASSIP data showed a strong presence of Chignik stocks in that area. This is not surprising since it is just west of SEDM. If Chignik early run sockeye are to rebuild, these salmon need to migrate back to spawn. Once the health of the run is regained, this area along with SEDM will benefit.

The pages following the letter is verification that from at least 1981-1988, Chignik's early run escapement was minimum 400,000; I believe it was moved to 350,000 minimum around 2001 to the detriment of Chignik. Lowering the escapements do not improve the situation in Chignik. The department says they manage for mid-range but then don't because, and for instance, they have a new notion that there is not enough zooplankton even though in warm shallow lakes, juvenile sockeye feed primarily on insects. The department did this (minimized escapement) in Chignik from 2002-2012. There is no reason they won't manage for whatever is low end again.

The volume of sockeye in Chignik can be increased as was done in the past by properly proportioning escapements while maintaining correct minimums. To do this, interception fisheries must be adequately restrained. In the past, interception was bad when it was high seas gillnets. Fishing rebounded when it was curtailed and proper escapements were restored across the state. Now, once again, interception

(this time allowed by the state) has unbalanced the system. Interception only works if it is harvesting only excess. There is no excess from Chignik (or AYK or Nelson Lagoon from what I hear) to give. Stop protecting a cash cow interception fishery when it is harming other areas. The salmon can be caught nearer to the terminal areas. With RSW, salmon can be long hauled just like they are in Chignik. Processing has become state of the art and the many Bristol Bay processors can handle the large Bristol Bay runs. The interception fisherman can relocate just as easily as we have had to in Chignik (yes it hurts financially and culturally-we know).

I wish I could say "take action to retore the salmon returning to Chignik and other terminal areas or if not just say you're not so we can stop bleeding out hoping that something will be rectified". Then we could go modify the management plan to be just another intercept fishery. But that would be wrong because then we would be just like the South Pen existing under a guise of sustainability with no real accountability to migrating salmon stocks.

Thanks for taking this all in. Please rein in the South Pen interception and protect escapements.

Sincerely,

Raechel Allen

II. 1981 SEASON SUMMARY

A. Overview of 1981 Season

During 1981, the early run proved to be extremely early and strong. Sockeye returning to Chignik were approximately 7 to 10 days early which caught fishermen, processors and Department of Fish and Game personnel completely off guard. As stated in the regulations, the Chignik salmon season was scheduled to open no earlier than June 9, and only if minimum escapement requirements were achieved by June 7. Due to the extremely heavy escapement of sockeye through June 6, the fishery was opened one day earlier than described in the regulation booklet (June 8, 1981). Minimum early run escapement requirements (400,000) were achieved by June 19. The fishery was closed June 19 by emergency order in order to build up the late run escapement and to analyze the most recent commercial catch scales. The Department was able to conclude that less than 50% of the sockeye currently entering the Chignik Bay district were late run, thus an emergency order was issued reopening the Central and Chignik Bay districts. Sockeye scales collected on June 22 indicated that 43% were late run fish; with this information it was anticipated that the number of late run sockeye would be greater than 50% by June 26. The closure announcement and emergency order was issued on June 23 closing the season at 10:00 p.m. Wednesday, June 24. 1981 Chignik AMR, p. 22 Minimum June escapement of 400,000

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1982 SEASON SUMMARY

Overview of 1982 Season

During 1982, the early run proved to be extremely strong. Minimum escapement requirements, plus a large build up of sockeye within Chignik Lagoon was observed on June 11. The first commercial fishery opening was announced on June 12, it opened both the Central and Chignik Bay districts for 16 hours, starting at 6:00 a.m. June 14. Due to the fishermen's strike no commercial harvest occurred until June 18. By the evening of June 18 the total escapement had climbed to 428,930, which greatly exceeded the minimum goal of 150,000 for this date. The sockeye catch on June 18 slightly exceeded 300,000, this established the all time record one day harvest.

1982 Chignik AMR, p. 22 (Minimum Escapements)

JUSTIFICATION:

During the closure prior to the upcoming July 3rd opening the minimum escapement goal of 400,000 Black Lake bound red salmon was achieved for the month of June. Therefore it is justifiable to allow a fishery on the excess early run reds before the transition period between theBlack Lake and Chignik Lake (Lake run) red salmon. The Eastern District will remain closed until the strength of the late run is determined. The Western and Perrybille Districts will open to allow an early fishery on incoming pink and chum salmon, which will give a good indication of run strength without running the risk of over harvesting these stocks.

1984 Chignik AMR, pg. 109 Minimum Black Lake escapement

1985 CHIGNIK AREA
SALMON MANAGEMENT PLAN

The following statements are intended as a guideline for managing the 1985 Chignik salmon runs. As in the past, frequent in-season emergency order adjustments will be made when necessary as the runs develop. No statements contained in this management plan in regards to numbers of fish or fishing time should be taken as a guarantee.

SOCKEYE SALMON

The total sockeye salmon run is forecast to be approximately 2.49 million fish. The early run is expected to be the stronger of the two with an expected 1.55 million total return. The minimum escapement goal on the early run is 400,000 fish, therefore the projected harvest will be 1.15 million sockeye. The total late run return is expected to be 935,000 fish. The late run minimum escapement goal is 250,000 which should allow a commercial harvest of approximately 685,000 fish. Total estimated harvest for both runs should be 1.84 million fish, which includes fish that may be intercepted outside the Chignik area.

The first day of fishing could be as early as June 1 by regulation. However, compared to past years this would be highly unlikely and only implemented if a minimum of 40,000 sockeye salmon have passed the weir and a strong buildup of fish in the lagoon is indicated by test fishing. Additional openings will be based on escapements, fishery performance and test fishing results.

During this commercial fishery the daily escapement of sockeye salmon through Chignik weir was less than what is needed to achieve the escapement goal of 400,000 for the month of June. The fishery remained closed until 27 June when it was opened for two days to harvest a surplus within the lagoon. A total of 140,796 sockeye salmon were harvested. The escapement goal of 400,000 was achieved on 2 July.

During the transition period (26 June to 9 July) between the Black Lake and Chignik Lake sockeye salmon runs, scale samples collected from the commercial

1985 Chignik AMR p.12 Minimum escapement goal of 400,000 in June was achieved July 2

Narver (1966) and Dahlberg (1968) independently estimated the desired escapement goals for the Chignik sockeye salmon stocks as 400,000 fish for Black Lake and 250,000 fish for Chignik Lake. Since 1966 the sockeye salmon runs to Chignik have been managed to ensure that these escapement goals are met. The effectiveness of this management strategy is evident from the increases in the Chignik runs during the last 32 years. For the three most recent ten-year periods, the average total annual sockeye returns are:

1985 Chignik AMR, p.11 Narver and Dalberg independently estimated the escapement at 400,000 Black Lake and 250,00 Chignik Lake

1986 CHIGNIK AREA
SALMON MANAGEMENT PLAN

The following statements are intended as a guideline for managing the 1986 Chignik salmon runs. As in the past, frequent in-season emergency order adjustments will be made when necessary as the runs develop. No statements contained in this management plan in regards to numbers of fish or fishing time should be taken as a guarantee.

SOCKEYE SALMON

The total sockeye salmon run is forecast to be approximately 2.81 million fish. The early run is expected to be the stronger of the two with an expected 1.90 million total return. The minimum escapement goal on the early run is 400,000 fish, therefore the projected harvest will be 1.50 million sockeye. The total late run return is expected to be 1.30 million fish. The late run minimum escapement goal is 250,000 which should allow a commercial harvest of approximately 661,000 fish. Total estimated harvest for both runs should be 2.16 million fish, which includes fish that may be intercepted outside the Chignik area.

The first day of fishing could be as early as 1 June by regulation. However, compared to past years this would be highly unlikely, and only implemented if a minimum of 40,000 sockeye salmon have passed the weir and a strong buildup of fish in the lagoon is indicated by test fishing. The average opening for commercial fishing based on the past 10 years is 10 June. Additional openings will be based on escapements, fishery performance and test fishing results.

1986 Chignik AMR, pg 25 minimum escapement goals of 400,000 Early run and 250,000 Late run

The average total return prior to the early 1970's was less than 1 million per year. Due to research conducted in the early 1960's and the subsequent establishment of escapement goals to Black Lake of 400,000 and to Chignik Lake of 250,000 the average total return increased to 1.75 million between 1968-1977 and 2.61 million from 1978 to 1987.

1987 Chignik AMR, p. 2 success of escapement plan

Overview of the 1987 Salmon Season

The Chignik River weir was operational on 27 May. Prior to a commercial opening within the Chignik Area, there needs to be a cumulative escapement count of 40,000 sockeye through the weir by 12 June with a good indication of a buildup within the lagoon. Inseason escapement goals are set for June and July in order to assure that the overall escapement goals of 400,000 for the Black Lake run and 250,000 for the Chignik Lake run are achieved.

1987 Chignik AMR, p. 7 Escapement goals

The Chignik Management Area closed to commercial salmon fishing at 6:00 P.M. 18 June and remained closed until 8:00 P.M. 20 June in order to bring the sockeye escapement back within the escapement schedule. A cumulative escapement of 200,000 sockeye through the weir by 20 June is desired. At 10:00 A.M. on 20 June this was achieved so another opening was announced for 8:00 P.M. on 20 June. The fishery remained open until 6:00 P.M. 23 June when a closure was again necessary to ensure that the early run escapement goal of 400,000 sockeye would be achieved by the end of June. The harvest during this second opening was 237,904 sockeye. At 12:00 Noon on 26 June it was projected that the early run escapement goal of 400,000 for the month of June would be achieved so another commercial fishery was announced for 6:00 P.M. 27 June. This fishery remained open until 12:00 P.M. on 7 July at which time a closure was necessary in order to evaluate the strength of the late (Chignik Lake) run. The harvest during this period was 714,623 sockeye.

1987 Chignik AMR, p.8 400,000 to Black Lake by end of June

SOCKEYE SALMON

The total sockeye salmon run is forecast to be approximately 3.10 million fish. The early run is expected to be the stronger of the two with an expected 1.80 million total return. The minimum escapement goal on the early run is 400,000 fish, therefore the projected harvest will be 1.40 million sockeye. The total late run return is expected to be 1.30 million fish. The late run minimum escapement goal is 250,000 which should allow a commercial harvest of approximately 1.05 million fish. Total estimated harvest for both runs should be 2.45 million fish, which includes fish that may be intercepted outside the Chignik area.

1987 Chignik AMR, p. 149 Minimum early run is 400,000 and minimum late run is 250,000

CHIGNIK RIVER SYSTEM
SOCKEYE ESCAPEMENT GOALS
BLACK LAKE (EARLY RUN) AND CHIGNIK LAKE (LATE RUN)

The numbers in the escapement tables listed below were derived from averages over several years of escapements of various timing and magnitude. It should be noted that daily escapement levels will fluctuate considerably throughout the run. THE TABLES LISTED SERVE ONLY AS A GUIDE FOR ACHIEVING THE TOTAL ESCAPEMENT FOR EACH RUN. In-season variations from the figures listed may be due to variations in actual run timing and/or strength of the run.

EARLY RUN - 400,000 Minimum

June 12	40,000
14	50 - 65,000
16	75 - 100,000
18	125 - 150,000
20	175 - 200,000
22	225 - 250,000
25	275 - 325,000
30	350 - 400,000

LATE RUN - 250,000 Minimum

	WHEN EARLY RUN ESC. IS ACHIEVED	WHEN EARLY RUN ESC. IS NOT ACHIEVED
July 6	-	40,000
8	-	45 - 50,000
10	40,000	55 - 65,000
12	50 - 60,000	70 - 75,000
14	65 - 75,000	75 - 80,000
16	80 - 90,000	80 - 90,000
19	100 - 115,000	100 - 115,000
21	125 - 135,000	125 - 135,000
23	145 - 160,000	150 - 160,000
26	170 - 180,000	170 - 180,000
29	185 - 195,000	190 - 195,000
31	195 - 200,000	195 - 200,000

1987 Chignik AMR, p. 154

The Chignik Lakes system has been the focus of intense research efforts by the University of Washington, Fisheries Research Institute (FRI) and the Alaska Department of Fish and Game (ADF&G). The initial studies were performed by Narver (1966) and Dahlberg (1968). Through independent methods both authors recommended similar levels of sockeye salmon escapement for Black Lake, approximately 400,000 fish. Dalhberg estimated an optimum escapement of 340,000 fish for Chignik Lake. Both authors concurred that maximum production was limited by each lakes carrying capacity and a density dependent relationship existed between fry populations in the two lakes. Narver estimated the carrying capacity for Chignik and Black Lakes at 16.0 and 14.9 million sockeye salmon fry, respectively. Low escapements to Black Lake in the 1940's and 1950's resulted in low Black Lake fry densities which allowed competitor species to occupy habitat formerly utilized by sockeye salmon. To bring Black Lake production back to historical levels Narver recommended that an escapement of 411,000 (14.9 million fry based on a mean survival of 36.3 fry per spawner, range 17.8 - 56.3) be maintained. Initially, until sockeye salmon fry regained dominance, this level of escapement was anticipated to result in emigration of Black Lake fry into Chignik Lake. To accomodate the Black Lake fry emigration Narver recommended that the Chignik Lake escapement be held at 200,000 fish. He suggested maintaining this level of escapement to Chignik Lake for five years until the Black Lake ecosystem reached the desired equilibrium.

The ADF&G established the sockeye salmon escapement goals for Black and Chignik Lakes at 400,000 and 250,000 fish, respectively. Commercial fishing time for sockeye salmon has been predicated on achieving a threshold level of escapement for each run by a specific date (Appendix B). Monitoring escapement with respect to achieving threshold levels is complicated by an overlap in early and late run time of entry called the transition period. The transition period generally occurs from June 17 through July 22 (Marshall and Burgner 1977). Currently, there are two methods used by the area management biologist to estimate daily proportions of each run during the transition period.

1988 Chignik AMR, pg. 3 (reasoning for escapements of 400,000 and 250,000 / competitor species suppression)

SOCKEYE SALMON

The total sockeye salmon run is forecast to be approximately 2.22 million fish. The early run is expected to be the stronger of the two with an expected 1.43 million total return. The minimum escapement goal on the early run is 400,000 fish, therefore the projected harvest will be 1.03 million sockeye. The total late run return is expected to be 0.79 million fish. The late run minimum escapement goal is 250,000 which should allow a commercial harvest of approximately 543,000 fish. Total estimated harvest for both runs should be 1.57 million fish,which includes fish that may be intercepted outside the Chignik Area.

1988 Chignik AMR, pg. 119 400,000 / 250,000 minimums

CHIGNIK RIVER SYSTEM
SOCKEYE ESCAPEMENT GOALS
BLACK LAKE (EARLY RUN) AND CHIGNIK LAKE (LATE RUN)

The numbers in the escapement tables listed below were derived from averages over several years of escapements of various timing and magnitude. It should be noted that daily escapement levels will fluctuate considerably throughout the run. THE TABLES LISTED SERVE ONLY AS A GUIDE FOR ACHIEVING THE TOTAL ESCAPEMENT FOR EACH RUN. In-season variations from the figures listed may be due to variations in actual run timing and/or strength of the run.

EARLY RUN - 400,000 Minimum

June 12	40,000
14	50 - 65,000
16	75 - 100,000
18	125 - 150,000
20	175 - 200,000
22	225 - 250,000
25	275 - 325,000
30	350 - 400,000

LATE RUN - 250,000 Minimum

	WHEN EARLY RUN ESC. IS ACHIEVED	WHEN EARLY RUN ESC. IS NOT ACHIEVED
July 6	-	40,000
8	-	45 - 50,000
10	40,000	55 - 65,000
12	50 - 60,000	70 - 75,000
14	65 - 75,000	75 - 80,000
16	80 - 90,000	80 - 90,000
19	100 - 115,000	100 - 115,000
21	125 - 135,000	125 - 135,000
23	145 - 160,000	150 - 160,000
26	170 - 180,000	170 - 180,000
29	185 - 195,000	190 - 195,000
31	195 - 200,000	195 - 200,000

1985 CHIGNIK AREA
SALMON MANAGEMENT PLAN

The following statements are intended as a guideline for managing the 1985 Chignik salmon runs. As in the past, frequent in-season emergency order adjustments will be made when necessary as the runs develop. No statements contained in this management plan in regards to numbers of fish or fishing time should be taken as a guarantee.

SOCKEYE SALMON

The total sockeye salmon run is forecast to be approximately 2.49 million fish. The early run is expected to be the stronger of the two with an expected 1.55 million total return. The minimum escapement goal on the early run is 400,000 fish, therefore the projected harvest will be 1.15 million sockeye. The total late run return is expected to be 935,000 fish. The late run minimum escapement goal is 250,000 which should allow a commercial harvest of approximately 685,000 fish. Total estimated harvest for both runs should be 1.84 million fish, which includes fish that may be intercepted outside the Chignik area.

The first day of fishing could be as early as June 1 by regulation. However, compared to past years this would be highly unlikely and only implemented if a minimum of 40,000 sockeye salmon have passed the weir and a strong buildup of fish in the lagoon is indicated by test fishing. Additional openings will be based on escapements, fishery performance and test fishing results.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 105: Oppose
Proposal 106: Support
Proposal 107: Oppose
Proposal 108: Oppose
Proposal 109: Support
Proposal 110: Oppose
Proposal 112: Oppose
Proposal 115: Oppose
Proposal 116: Oppose
Proposal 118: Support
Proposal 119: Oppose
Proposal 120: Support With Amendments
Proposal 128: Support
Proposal 130: Oppose
Proposal 131: Oppose
Proposal 132: Oppose
Proposal 133: Support
Proposal 134: Support
Proposal 135: Support
Proposal 136: Support
Proposal 137: Support
Proposal 139: Support
Proposal 140: Support
Proposal 142: Oppose
Proposal 143: Support
Proposal 144: Oppose
Proposal 145: Oppose
Proposal 146: Oppose
Proposal 147: Oppose
Proposal 148: Support
Proposal 149: Support
Proposal 150: Support
Proposal 151: Oppose
Proposal 152: Oppose

Past Over-Fishing, the Rebuild, and Present Decline of Black Lake Sockeye Escapement

Marit Carlson-VanDort and members of the board,

Chignik had in the past an escapement of 400,000 minimum to the Black Lake early run usually by June 30th and 250,000 sockeye minimum escapement for the Chignik Lake late run by August 31st (200,000 by July 31st). These escapements were employed after the early run in Chignik became over fished (figure 3), and lake studies commenced (figure 7-9,12) which led to optimum and threshold escapements to rebuild the runs to former levels (figure 8,18) while affording a fishery. One of the important findings of these studies was that lake competitor species (i.e. sticklebacks) should be suppressed by increasing escapement to Black Lake and by doing this, it was expected the overfished run would rebuild (figure 7). The run did in fact rebuild (figure 18) and for most of the 80's, 400,000 early run minimum escapement by June 30th and 250,000 late run minimum escapement by the end of August was achieved by management (figure 2,14-16, 18 and 19).

Then in the 90's Chignik escapements were recorded as goals rather than minimum goals of 400,000 and 250,000 (figure 20-26).

In 1995, the escapements were listed as BEG's (figure 27).

In 1998 the escapement degraded to BEG's with an upper range of 400,000 and 250,000 (figure 28).

In 2001 the escapements had become BEG's with ranges of 350,000-400,000 and 200,000-250,000 (figure 29-30). The minimum escapement total had effectively been lowered by 100,000 sockeye. The overall escapements implemented since 1966 (figure 18,19,21-22) had been overlooked or disregarded.

Subsequently in 2002 and through at least 2012, the ADFG managed the sockeye escapement in Black Lake and Chignik Lake largely based on zooplankton counts and thus targeted the new minimum escapements (figure 38,39). This decision, predicated on over-escapement, did not occur prior to 2002 although the early run cleared 500,000 by June 30th at least seven times since 1970 (figure 1). In fact, in the ten years presented as over escaped in figure 38, Black Lake was actually under escaped for four of the years based on 400,000 as the needed escapement. If the escapement were to have been left at 400,000 mimimum for Black Lake, I doubt this would have ever been an issue. The letter makes reference to abundance of zooplankton Cyclops being a negative factor, however in figure 40, Cyclops are found more in the stomachs of juvenile sockeye and that sockeye are quite well adapted to eating them. Juvenile sockeye in Black Lake and other shallow lakes also eat winged and larval insects as a food base (figure 41,42).

The logic for targeting (from approx. 2002-2012) a lower escapement to Black Lake which is a shallow warm lake with the extra benefit of insect larva as food which can contribute to as much as 74% of juvenile sockeye diets in shallow lakes, seems poor at best in light of the knowledge that reducing escapements increases competitor species

(figure 7). This, along with the knowledge that increasing juvenile sockeye numbers suppresses competitor species and provides for greater sockeye production (Figure13) should have been carefully considered and now reconsidered. If salmon escapement to Black Lake is not maintained to achieve 400,000 total by June 30th or soon thereafter as once was the normal practice the Chignik River system, the fishery will continue faltering, the communities will continue suffering, and the benefit of 1-3 million sockeye salmon to the local and state economies will be forgone. 400,000 was the minimum early run escapement and the minimum needed to maintain the health of Black Lake sockeye runs. 250,000 minimum for July and August late run/Chignik Lake.

Most recently, the Department of Fish and Game is proposing a change (lowering) of sockeye escapement goals in the Chignik River watershed and also plan to combine the runs (somehow) in the process. If this concept is put into practice, it will further weaken already faltering runs of which Chignik is now a management concern. Lowering escapements for the purpose of achieving harvest does not address the poor runs and will lessen future returns. If the optimum escapement into Black Lake is not maintained, returns will be jeopardized by competitor species (figure 7).

By misdiagnosing the problem, the solution will go unsolved. The impact on Chignik harvests from opening more area for interception in the South Pen in 2004 should have been more carefully evaluated. Shifting catch from Unimak to the Shumagins when the longstanding and historically based June GHL was removed in 2001 should have had more scrutiny. Targeting newly developed (and lowest) escapement for two salmon cycles in Chignik since 2002 should not have occurred. Adjusting weekly threshold escapements so that June total escapement count was lowered (figure 1) should not have been allowed. Realize that the minimum goals of the past (80's) didn't even factor in salmon that escaped in September and that the extra in September was not ever considered as over escapement. Manipulating escapements based on number trends without identifying the causes is reactionary but without comprehensive science. Lowered escapements rarely create increased returns. Chignik is one of the most studied sockeye systems in Alaska and the valid information found in the past should still be applied to inform present decisions today. Science doesn't have an expiration date.

Please do not allow the two separate Chignik lakes escapements, which differ in spawning location, timing of spawning migration, length of freshwater residence, and age of maturity (figure 19), to be combined as one overall escapement. Do not allow the minimum escapement to be lowered. Lowering escapements (especially to Black Lake) contradicts knowledge from past studies showing that increased escapement was necessary to rebuilding and maintaining the runs (figure 18). If the intention of lowering escapements is to keep Chignik fishermen fishing then open our Western and Perryville in June as well (because allowing escapements that do not adhere to 400,000 Black Lake/early run minimum escapement will serve to keep Chignik sockeye returns anemically less than what they could be in the future. It would be wrong to let us fish on only the returns of anemic escapements.

I have speculated if lowering the lower bounds of the escapement is for the purpose of certifying interception fisheries as sustainable. It will certainly make interception fisheries have less burden of conservation at times,such as when the Shumagins seining opened less in 2022 when Chignik didn't make escapements. If the purpose of merging runs and lowering the minimum escapement is not to get us out fishing or to regain sustainable fishery certification, then what is the benefit to the people and MSY and future escapements? There are allocative implications.

Again, if salmon escapement to Black Lake is not maintained to achieve 400,000 total near June 30th as once was the normal practice the Chignik River system, the fishery will continue faltering, the communities of Chignik will continue suffering, and the benefit of 1-3 million sockeye salmon to the local and state economies will be forgone. 400,000 was the minimum early run escapement and the minimum needed to maintain the health of Black Lake sockeye runs. 250,000 minimum for July and August late run/Chignik Lake. The fish and game had the knowledge to rebuild the Chignik run the last time it collapsed (over fished and under escaped early run), even making predictions (figure 8) of when it would be rebuilt and to what levels. It can be rebuilt again.

Please do not allow the Chignik sockeye escapements to be merged and the minimum escapement lowered. The success of each individual run is based on specifically timed and enumerated escapements. Future fisheries, communities and businesses rely on it.

Sincerely,

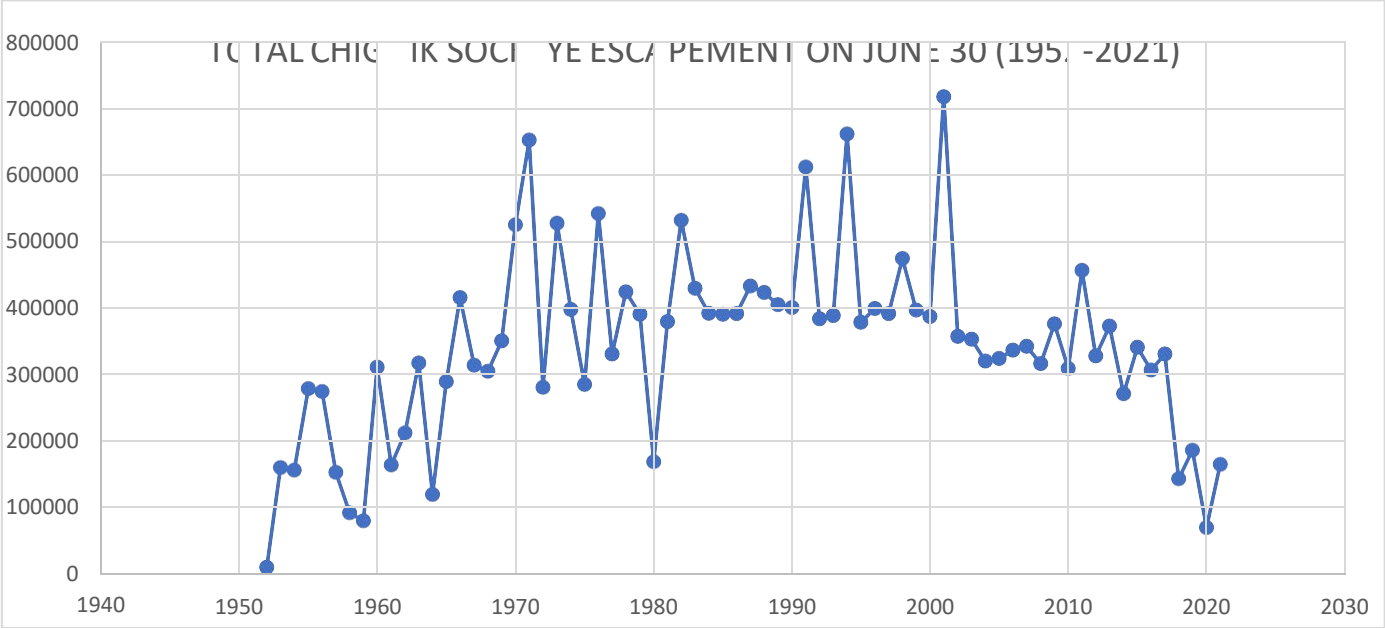
Raechel Allen

The following contains supporting literature:

Basic Index of Primary References

- The graph below (figure1) presents the total sockeye escapement at Chignik weir on June 30th from 1952-2021. June 30th was once the threshold date to have 400k sockeye escape through the weir
- Prior to the 60's the Black Lake run had been over fished. (figure 3)
- In the 60's it was determined that increasing escapement to Black Lake would suppress competitor species (i.e. stickleback) resulting in restoration of former production levels. (figures 4,5,6,7, 8 9, 12, 13, and 18)
- From 1966-1969 the optimum escapement to Black Lake was estimated at approximately 400,000 sockeye. (figure 10 and 11)

- By 1981 400,000 minimum escapement was implemented and continued through at least 1988 (figure 2, 14,15,16, 18 and 19)
- From 1989-1995 Black Lake escapement of 400,000 was only identified as a goal. (figure 20-26)
- In 1995 Black Lake escapement goal was stated as a BEG of 400,000. (figure 27)
- By 1998 Black Lake escapement goal of 400,000 had become a BEG upper range. (figure 28)
- In 2001 the Black Lake BEG was listed as a range of 350k-400k. (figure 29 and 30)
- In 2002, the department deemed it beneficial to approach the lower bounds of the Black Lake BEG. This continued at least until approximately 2012. During this time, daily thresholds were lowered in June as well. (figure 38 and 39)
- In 2018-2021 Black Lake did not achieve even the more recent minimum escapement of 350,000



1.) Above graph compiled from ADFG data.

Table 1.

CHIGNIK RIVER SYSTEM
SOCKEYE ESCAPEMENT GOALS
BLACK LAKE (EARLY) AND CHIGNIK LAKE (LATE) RUNS

The numbers in the escapement tables listed below were derived from averages over several years of escapements of various timing and magnitude. It should be noted that daily escapement levels will fluctuate considerably throughout the run. THE TABLES LISTED SERVE ONLY AS A GUIDE FOR ACHIEVING THE TOTAL ESCAPEMENT FOR EACH RUN. In-season variations from the figures listed may be due to variations in actual run timing and/or strength of the run.

1987 Chignik AMR p. 142

EARLY RUN - 400,000 Minimum

June 12	40,000
14	50 - 65,000
16	75 - 100,000
18	125 - 150,000
20	175 - 200,000
22	225 - 250,000
25	275 - 325,000
30	350 - 400,000

LATE RUN - 250,000 Minimum

WHEN EARLY ESCAPEMENT IS ACHIEVED	WHEN EARLY RUN ESCAPEMENT IS NOT ACHIEVED
July 6 -	40,000
8 -	45 - 50,000
10 40,000	55 - 65,000
12 50 - 60,000	70 - 75,000
14 65 - 75,000	75 - 80,000
16 80 - 90,000	80 - 90,000
19 100 - 115,000	100 - 115,000
21 125 - 135,000	125 - 135,000
23 145 - 160,000	150 - 160,000
26 170 - 180,000	170 - 180,000
29 185 - 195,000	190 - 195,000
31 195 - 200,000	195 - 200,000

2.) 1987 Chignik AMR p. 142

Conclusion

The Chignik system early run has always been the stocks that have contributed to producing the greatest historical annual runs into the Chignik system. Upon the decline of the early run, the late run has remained to be somewhat the same static producer. The late run has always received the needed escapement, due to past management policies allowing overharvest of early stocks and allowing the bulk of the escapement to occur during the late run.

3.) 1964 Chignik Area Annual Report, p. 43

The 1965 spawning ground surveys indicated good distribution of spawners in the Black Lake system with no abnormal egg loss due to superimposition. Areas where increased escapement is needed, such as the Alec River gravel bars, will have to gradually be built up over a period of years as competing species in the lake become more strongly dominated. At this time an escapement of 300,000 in the Black Lake system and 50,000 in the Black River system should be optimum. As the red salmon fry gradually suppress the stickleback population in Black Lake, it would appear that early escapements approaching 500,000 will be in order. This, of course, will depend on an annual assessment of the populations in Black Lake.

4.) 1965 Chignik Area Annual Report, p.39

A review of the age classes represented in the escapements during the productive period from 1920 to 1930 suggests that in certain years Chignik Lake served as a secondary rearing area for Black Lake system progeny. It is difficult to assume that the Black River system produced the large numbers of six year reds in the early portion of the run during those years. In late years it appears that Chignik Lake becomes a secondary rearing system only when the density of red salmon fry and stickleback exceed the carrying capacity of Black Lake, causing emigration. Chignik Lake functions as a secondary rearing area due to fry emigration at relatively low fry levels compared to former years, but as competing forms are depressed these levels should increase. At the present time, with competing forms at their present level, when a large early escapement occurs, late escapements into the Chignik Lake system should be depressed to 150 - 180,000 in preparation for fry emigration from the early system. Conversely, if the early escapement goals are not obtained, late escapement should be increased accord-

39

5.) 1965 Chignik Area Annual Report, p.39

ingly to fully utilize the Chignik Lake rearing capacity.

It will be necessary to closely monitor escapement for stock separation as the season progresses to make adjustments in goals.

The Fisheries Research Institute has been carrying on a tow netting program to establish fry indices as a measure of spawning success and rearing ground utilization. The index derived from the 1964 early reds is almost twice that of 1960 brood year index, and a substantial suppression of stickleback is evident. The 1965 tow netting index for Chignik Lake is not known at this time.

6.) 1965 Chignik Area Annual Report, p.40

5. The escapement levels into the Black Lake system must be kept yearly at an optimum level in order to suppress the Black Lake stickleback population by competing red salmon young during lake residency. Lake studies has shown that any reduction of escapement goals creates an increase of stickleback population, which have filled the biological niche of the red salmon young during the many years of under escapement into the Black Lake system. The complete suppression of the competing stickleback population should be a major step in returning the early system to the capabilities of past high production.

7.) 1965 Chignik Area Annual Report, p.43

Chignik River weir red salmon enumeration, comprehensive commercial catch analysis, limited tagging operations at points of interception of the Chignik system red salmon along the south side of the Alaska Peninsula, combined with age composition analysis of the separate segments of the run, is providing the data for the evaluation of the desired escapement levels for the two nursery areas in the Chignik River system. This combined data is currently being utilized for predicted red salmon returns to the Chignik system.

The Fisheries Research Institute is currently evaluating the impact of levels of red salmon escapement upon the carrying capacity of the two separate nursery areas to assist in the establishment of future desired escapement levels.

The former production level of the Chignik system is anticipated to be approximately 60% restored by 1969 and indicates possibilities of a commercial harvest of 800,000 to 1,000,000 annually within the years to follow.

8.) 1966 Chignik Area Annual Report, p.49

Nursery Lake Studies

Ecological studies of the nursery lakes conducted at Chignik by the Fisheries Research Institute since 1960 give corroborating evidence for a poor return in 1967. Tow net catches of juvenile sockeye salmon in the two lakes during late August are shown in Table 3.

The mean catch per tow of sockeye salmon fry (returning as age 1.3 fish in June, 1967) in Black Lake during 1963 was approximately one-half the six-year average. This is consistent with the low parent escapement to Black Lake in 1962. Further, growth of sockeye salmon fry was suppressed by abundant competitor species in Black Lake during 1963. Examination of the relationship between mean catch per tow of Black Lake fry and resultant adult returns indicates an early run of about 265,000 fish. More confidence, however, must be placed in the estimate of 189,000 based on the relationship between numbers of .2 fish one year and .3 fish the following year for two reasons: the paucity of tow net data and the fact that the tow net and adult return relationship does not contain any estimate of the variable of marine survival. The relationship between .2 and .3 fish of the same year class, however, does account for survival in two of the three years that .3 fish spend at sea.

9.) 1966 Chignik Area Annual Report, p.64

PRELIMINARY FORECAST

-Continued-

DISCUSSION OF 1970 FORECAST:

The optimum escapement for the Black Lake system has been estimated at approximately 400,000 red salmon. Assuming an actual return of 850,000 fish, this would indicate an early run commercial harvest of approximately 400,000 red salmon.

The Chignik Lake system should receive an escapement of approximately 200,000-250,000 spawners. This would leave approximately 150,000 red salmon for the late run commercial harvest.

In combination, the two systems should provide approximately 550,000 red salmon for commercial harvest in 1970.

The final forecast for the 1970 season was published as Informational Leaflet 144.

Prepared by: Paul Pedersen, Area Management Biologist
Division of Commercial Fisheries
Kodiak (Chignik)

10.) 1969 Chignik AMR

Discussion

The optimum escapement into the early system has been estimated at approximately 400,000 red salmon. With a predicted return of 1,336,000 fish, a possible commercial harvest of 936,000 can be anticipated prior to July 1.

The late system should receive an estimated 200-250,000 in escapement. With a forecast of only 370,000 fish, the possible harvest of this portion of the run would be near 150,000.

11.) 1970 Chignik Area Annual Report, p.35

8. A detailed study of the food habits, growth and interaction of juvenile sockeye, and potentially competing lake resident species was completed as a M.S. thesis. Results are summarized in the present report and two years of data are added to appropriate graphs and tables. Differences within and between lakes in summer food habits of the four species were analyzed. Black Lake fish generally contained more food and had higher growth rates than Chignik Lake fish, which was consistent with estimates of lake carrying capacity for juvenile sockeye. In Black Lake some evidence of interspecific competition for food was seen, but apparent effect on growth was seen only in the relationship between abundance of threespine stickleback and growth of ninespine stickleback, two species with similar diet. The most significant finding was that when age 0 sockeye in Black Lake were abundant, the abundance of the three non-sockeye species declined, supporting the hypothesis that higher levels of sockeye escapement and fry production in Black Lake would have the effect of reducing competitor species.

12.) 1974 Optimum Escapement Studies of Chignik Sockeye Salmon p.74 (the M.S Thesis was by William Parr)

Apparently, the increased abundance of juvenile sockeye salmon in the two lakes is suppressing the numbers of certain potential competitors for food and/or space which provides for greater sockeye salmon production in these resource areas. It was noted that when sockeye salmon were abundant in Black Lake, the abundance of three age classes of threespine sticklebacks (especially 0 to I) and age 0 ninespine sticklebacks was adversely affected. An effect on the abundance of all ages of pond smelt was noted, also, but the effect was not nearly as great as for the three- and ninespine sticklebacks.

13.) 1972, Optimum Escapement Studies of Chignik Sockeye p.9

FISHERIES RESEARCH INSTITUTE
College of Fisheries
University of Washington
Seattle, Washington 98195

OPTIMUM ESCAPEMENT STUDIES OF CHIGNIK SOCKEYE SALMON

Annual Progress Report - Anadromous Fish Project

Project No.: AFC-34
Contract No.: N-044-38-72G
Project Period: July 1, 1971-June 30, 1972

Prepared by: John W. Wells
and
Robert L. Burgner

II. 1981 SEASON SUMMARY

A. Overview of 1981 Season

During 1981, the early run proved to be extremely early and strong. Sockeye returning to Chignik were approximately 7 to 10 days early which caught fishermen, processors and Department of Fish and Game personnel completely off guard. As stated in the regulations, the Chignik salmon season was scheduled to open no earlier than June 9, and only if minimum escapement requirements were achieved by June 7. Due to the extremely heavy escapement of sockeye through June 6, the fishery was opened one day earlier than described in the regulation booklet (June 8, 1981). Minimum early run escapement requirements (400,000) were achieved by June 19. The fishery was closed June 19 by emergency order in order to build up the late run escapement and to analyze the most recent commercial catch scales. The Department was able to conclude that less than 50% of the sockeye currently entering the Chignik Bay district were late run, thus an emergency order was issued reopening the Central and Chignik Bay districts. Sockeye scales collected on June 22 indicated that 43% were late run fish; with this information it was anticipated that the number of late run sockeye would be greater than 50% by June 26. The closure announcement and emergency order was issued on June 23 closing the season at 10:00 p.m. Wednesday, June 24.

14.) 1981 Chignik Area Salmon Report to the Board of Fisheries December 1981

SOCKEYE SALMON

The total sockeye salmon run is forecasted to be approximately 4.4 million. The early run is expected to be stronger than any on record with a projected return of 3.2 million. The minimum early run escapement goal is 400,000, therefore, the projected harvest will be approximately 2.8 million. The total late run return is expected to be 1.2 million fish. The late run escapement goal is 250,000, which should allow a commercial harvest of approximately 950,000.

15.) 1984 Chignik Management Area Finfish Annual Report p. 33

1986 CHIGNIK AREA
SALMON MANAGEMENT PLAN

The following statements are intended as a guideline for managing the 1986 Chignik salmon runs. As in the past, frequent in-season emergency order adjustments will be made when necessary as the runs develop. No statements contained in this management plan in regards to numbers of fish or fishing time should be taken as a guarantee.

SOCKEYE SALMON

The total sockeye salmon run is forecast to be approximately 2.81 million fish. The early run is expected to be the stronger of the two with an expected 1.90 million total return. The minimum escapement goal on the early run is 400,000 fish, therefore the projected harvest will be 1.50 million sockeye. The total late run return is expected to be 1.30 million fish. The late run minimum escapement goal is 250,000 which should allow a commercial harvest of approximately 661,000 fish. Total estimated harvest for both runs should be 2.16 million fish, which includes fish that may be intercepted outside the Chignik area.

The first day of fishing could be as early as 1 June by regulation. However, compared to past years this would be highly unlikely, and only implemented if a minimum of 40,000 sockeye salmon have passed the weir and a strong buildup of fish in the lagoon is indicated by test fishing. The average opening for commercial fishing based on the past 10 years is 10 June. Additional openings will be based on escapements, fishery performance and test fishing results.

During the month of June, commercial fishery openings will be confined to the Chignik Bay District, Central District, and the Eastern District.

As adopted by the Board of Fisheries, the Eastern district will open and close to commercial salmon fishing simultaneously with the Chignik Bay and Central districts. The Eastern district may close to commercial salmon fishing during the overlap period, in late June and early July.

ACE 9594533

-25-

16.) 1986 Chignik AMR

Table 3. Sockeye salmon early and late run escapements and the combined early and late run catch in the Chignik Management Area from 1954 through 1985.

	Escapement			TOTALS		
YEAR	Early	Late	Total	Catch	Escapement	Run
1954	170,000	281,675	451,675	63,298	451,675	514,973
1955	248,000	198,576	446,576	348,646	446,576	795,222
1956	266,000	491,099	757,099	668,522	757,099	1,425,621
1957	172,000	336,545	508,545	302,079	508,545	810,624
1958	108,000	213,127	321,127	325,322	321,127	646,449
1959	94,000	288,607	382,607	391,295	382,607	773,902
1960	251,567	357,229	608,796	715,969	608,796	1,324,765
1961	140,715	254,971	395,686	322,890	395,686	718,576
1962	167,603	324,861	492,464	364,753	492,464	857,217
1963	332,535	200,312	532,847	408,606	532,847	941,453
1964	137,072	166,624	303,696	560,703	303,696	864,399
1965	307,192	163,152	470,344	635,078	470,344	1,105,422
1966	383,546	183,526	567,072	224,615	567,072	791,687
1967	328,000	189,000	517,000	472,874	517,000	989,874
1968	342,343	244,836	587,179	878,449	587,179	1,465,628
1969	366,589	132,055	498,644	310,087	498,644	808,731
1970	536,257	119,952	656,209	1,327,664	656,209	1,983,873
1971	671,668	232,501	904,169	1,016,136	904,169	1,920,305
1972	326,320	231,270	557,590	378,669	557,590	936,259
1973	533,047	247,144	780,191	870,706	780,191	1,650,897
1974	351,701	324,245	675,946	662,905	675,946	1,338,851
1975	308,914	268,734	577,648	400,193	577,648	977,841
1976	551,254	270,000	821,254	1,135,572	821,254	1,956,826
1977	419,311	315,000	734,311	1,972,219	734,311	2,706,530
1978	458,660	223,887	682,547	1,576,283	682,547	2,258,830
1979	385,694	352,122	737,816	1,063,742	737,816	1,801,558
1980	311,332	352,729	664,061	846,356	664,061	1,510,417
1981	438,540	392,909	831,449	1,839,469	831,449	2,670,918
1982	616,117	221,601	837,718	1,521,857	837,718	2,359,575
1983	426,177	409,458	835,635	1,823,057	835,635	2,658,692
1984	597,712	268,496	866,208	2,662,449	866,208	3,528,657
1985	377,516	370,314	747,830	946,369	745,840	1,692,209
AVERAGE 1954-1985	347,668	269,580	617,248	844,901	617,186	1,462,087
AVERAGE 1975-1984	451,371	307,494	758,865	1,484,120	758,865	2,242,984

The averages reflect greater harvest when Black Lake escapement was increased to 400k minimum. (personal observation)

17.) 1985 CHIGNIK MANAGEMENT AREA SALMON CATCH AND ESCAPEMENT SAMPLING STATISTICS, ADFG TECHNICAL DATA REPORT NO, 206

The average total return prior to the early 1970's was less than 1 million per year. Due to research conducted in the early 1960's and the subsequent establishment of escapement goals to Black Lake of 400,000 and to Chignik Lake of 250,000 the average total return increased to 1.75 million between 1968-1977 and 2.61 million from 1978 to 1987.

18.) 1987 Regional Information Report No. 4K88-4, p.2

I. **PROJECT TITLE: Chignik Weir Salmon Enumeration**

A. **Problem Statement and Objectives**

The Chignik River system sockeye run is comprised of two major stocks which are designated by the lake and the fish rear in as juveniles. The runs are termed early run (Black Lake run) and the late run (Chignik Lake run). The two lakes are interconnected and share a common outlet river. The stocks spawn in different areas, have a different time of spawning migration, and length of fresh water residence as juveniles and age at maturity (Higgins 1934; Narver 1963).

Minimum escapement goals for the Chignik sockeye salmon stocks are 400,000 for the Black Lake stock and 250,000 for the Chignik Lake stock. Since 1966 the Chignik sockeye returns have been managed to achieve these escapement goals. Managing for these escapement goals and a commercial harvest of the surplus is complicated by the overlap period (mid-June to mid-July) when both stocks are present in the fishery. Accurate escapement

ACE 8697604

19.) 1988 Chignik Operational Plan, Regional Information Report No.4K 88-26

Sockeye Salmon

Background Information

Economically, sockeye salmon are the most important commercial species in the Chignik Management Area. The local commercial fishery targets on sockeye salmon entering the Chignik Lakes system. Sockeye salmon of Chignik Lakes system origin are also intercepted outside the Chignik area in the Kodiak and Alaska Peninsula management areas.

Sockeye salmon returning to the Chignik Lakes system are comprised of two stocks one returning to Black Lake (early run) and the other to Chignik Lake (late run) (Figure 5). The ADF&G established the sockeye salmon escapement goals for Black Lake and Chignik Lake stocks at 400,000 and 250,000 fish, respectively. Commercial fishing time for sockeye salmon has been predicated on achieving a threshold level of escapement for each run by a specific date. Monitoring escapement with respect to achieving these threshold levels is complicated by an overlap in early and late run time of entry called the transition period. The transition period generally occurs from the last of June through mid-July. Two methods have been developed to estimate

ACE 9281478

20.) 1989 Chignik Management Area Salmon Fishery, Report to the Board of Fisheries, Regional Information Report No.4K89-37

The 1992 Chignik sockeye salmon fishery started on June 17. The cumulative escapement of 114,000 sockeye salmon past the weir was within the desired range of 75,000 - 100,000 sockeye salmon by June 16. A test fishery on June 16 indicated an estimated 150,000 - 200,000 sockeye salmon in Chignik Lagoon. Inseason escapement goals (Table 1) are set for June and July in order to assure that the overall escapement goals of 400,000 sockeye salmon for the Black Lake run and 250,000 sockeye salmon for the Chignik Lake run are achieved.

21.) Report to the Board, Regional Information Report1 No. 4K92-41, 1992, p.2

Narver (1966) and Dahlberg (1968) estimated the desired escapement goals for the Chignik sockeye salmon runs at 400,000 fish for Black Lake and 250,000 fish for Chignik Lake, respectively (Table 1). Since 1966, the sockeye salmon runs to Chignik have been managed to ensure that these escapement goals are met. The effectiveness of this management strategy is evident from the increase in the Chignik runs during the last 30 years. The total run averaged 2.10 million between 1963-1972, 2.49 million between 1973-1982, and 2.86 million between 1983-1992.

22.) Report to the Board of Fish, p.1, 1992 Regional Information Report1 No. 4K92-41

Sockeyes returning to the Chignik Lakes system are composed of one stock returning to Black Lake (early run) and the other to Chignik Lake (late run); sockeye escapement goals for Black and Chignik Lake stocks are 400,000 and 250,000 fish, respectively. Commercial fishing time for sockeyes have been based on a threshold level of escapement for each run by a specific date. To achieve these thresholds, the escapements are monitored; however, these monitoring efforts have been complicated by an overlapping in early and late runs' time of entry (i.e.,transition period). The transition period generally occurs from the last of June through mid-July. Two methods have been developed to estimate daily proportions of each run during the transition period. The first method is based on tagging studies (Dahlberg 1968). These studies (1962-1967) enabled biologist to develop an average time of early entry curve (ATOE) to apportion the Chignik sockeye runs into early and late components. A form of this method is currently used for in-season management of the fishery. The second method, developed in the late 1970s

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23.) 1993 Chignik Regional Comprehensive Salmon Plan 1992-2001

Sockeye salmon escapement goals were 400,000 fish for Black Lake and 250,000 fish for the Chignik Lake stocks. Commercial fishing time for sockeye salmon has been regulated based on achieving interim threshold escapements goals by specific dates for each run. Achieving these thresholds is complicated due to overlap of the two runs. This run timing overlap (the transition period) generally occurs during the latter part of June to early July .

24.) 1994 Chignik AMR, Regional Information Report No. 4K97-18, p.3

Narver (1966) estimated the sockeye salmon escapement goals for Black Lake at 400,000 and for Chignik Lake at 250,000. Commercial fishing time for sockeye salmon has been regulated based on achieving threshold escapements by specific dates for each run (Table 8). Achieving these thresholds is complicated by the run timing overlap (the transition period), which generally occurs during the latter part of June to early July. This is a critical time for management biologists who must assess the catch using age and stock composition to determine which stock dominates.

25.) 1995 Chignik Management Report to The Board of Fisheries, p.3

Narver (1966) estimated the sockeye salmon escapement goals for Black Lake at 400,000 and for Chignik Lake at 250,000. Commercial fishing time for sockeye salmon has been regulated based on achieving threshold escapements by specific dates for each run (Table 8). Achieving these thresholds is complicated by the run timing overlap (the transition period), which generally occurs during the latter part of June to early July. This is a critical time for management biologists who must assess the catch using age and stock composition to determine which stock dominates.

26.) 1995 Chignik AMR, p.4

The BEG's for Sockeye salmon are 400,000 fish for Black Lake and 250,000 fish for the Chignik Lake stocks. Commercial fishing time for sockeye salmon is regulated based on achieving interim threshold escapements goals by specific dates for each run. Achieving these thresholds is complicated due to overlap of the two runs (the transition period) which generally occurs during the latter part of June to early July .

27.) 1995 Chignik AMR, Regional Information Report No. 4K98-12, p. 4

The upper range of BEGs for sockeye salmon are 400,000 fish for Black Lake and 250,000 fish for Chignik Lake. Commercial fishing time for sockeye salmon is regulated on achieving interim escapement goals by specific dates for each run (Owen 1998a). Achieving these goals is complicated due to overlap of the two runs (transition period).

28.) 1998 Chignik AMR, p.5, Regional Information Report No. 4KOO-41

Appendix G. Sockeye salmon escapement goal summary for Chignik early and late run.

Regulatory Area: Chignik (Area L) – Chignik Bay District, Chignik Lagoon

Stock Unit: Chignik River

Primary Management Division: Commercial Fisheries

Primary Fisheries: Commercial purse seine; Subsistence

Biological Escapement Goal:		
	Early Run:	350,000 to 400,000
	Late Run:	200,000 to 250,000 by September 1
	Total:	550,000 to 650,000

Sustainable Escapement Goal: None specified

Optimal Escapement Goal: None specified

Inriver Goal: None specified

Action Points: None specified

Escapement Enumeration Method: Weir counts

History of Goal: Current escapement goals were fashioned in the mid- to late-1960s, based upon studies conducted by the University of Washington. One set of studies looked at the potential carrying capacity of Black Lake in terms of prey resources and utilized a ratio of mean fall fry per spawner of the Black Lake (early run) return to calculate an optimum number of spawners of 467,000. For Chignik Lake, with a lower density of non-sockeye species but more varied age classes of juvenile sockeye, plus the burden of supporting Black Lake fry during their outmigration, the optimum number of spawners was calculated as 200,000.

Another set of studies by UW in the late 1960s applied Ricker spawner-recruit analysis to returns to each lake for the period 1922-1960, deriving an optimum escapement for Black Lake of 383,000 and for Chignik Lake of 340,000. Given a presumption that the early part of the Black Lake return had been overfished during WWII, the goal for Black Lake was raised by 12.5% to a total of 438,000. For Chignik Lake, the goal was set at 200,000, with the intention that it would be increased to the calculated optimum of 340,000 once the suspected species composition of Black Lake would be predominated by sockeye fry and thus fewer of the Black Lake fry would need to rely on Chignik Lake.

In 1969 the various numbers for Black Lake and Chignik Lake were adjusted to an even 400,000 and 250,000 respectively. The goals have remained essentially unchanged for the past thirty years, although an additional goal of 25,000 was established in 1998 for the period September 1-15. With the benefit of recent smolt enumeration studies, and limnology studies, along with recent spawner-recruit data, CF will be reviewing the Chignik early and late run sockeye salmon BEG in accordance with the EGP and SSFP.

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29.) 2001 Escapement Goals for Pacific Salmon in the Kodiak, Chignik, and Alaska Peninsula Aleutian Islands Areas of Alaska Regional Information Report) No. 4KOI-66 (Nelson and Lloyd)

Sockeye Salmon

The Chignik River sockeye salmon early run peaks in late-June and the late run peaks in July (Figure 7). The sockeye salmon BEGs for the early run (350,000 to 400,000) and late run (200,000 to 250,000) were established in the 1960s (Nelson and Lloyd 2001). The 2002

30.) 2002 Chignik AMR, p.9

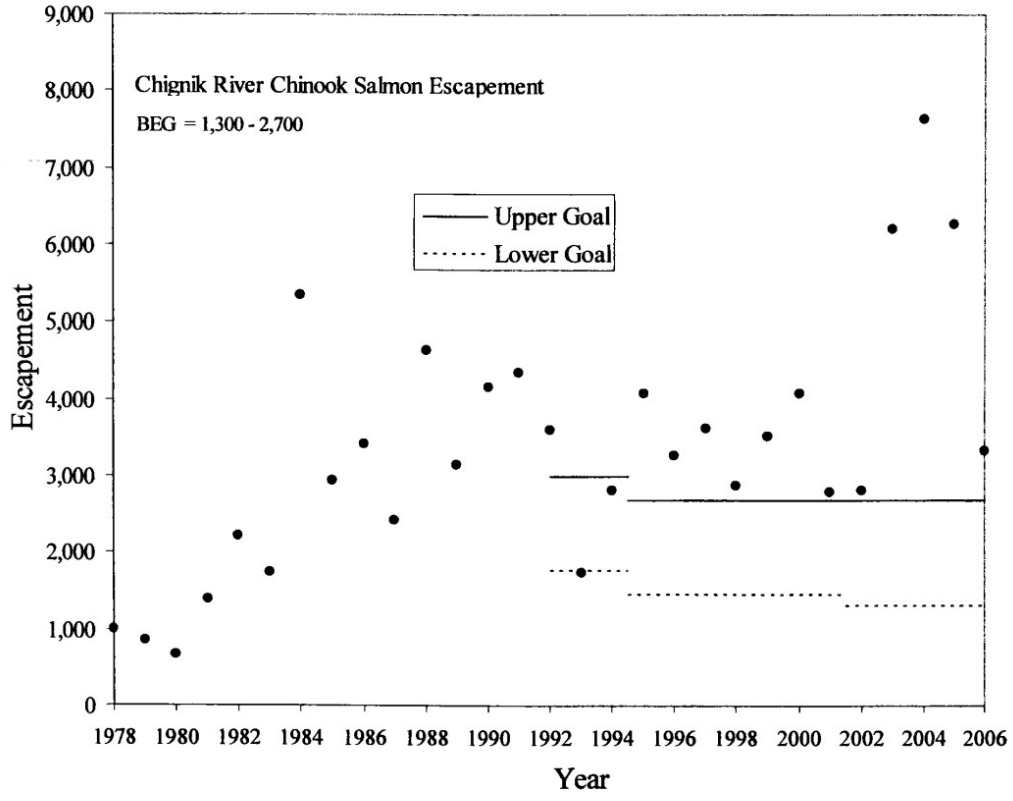
A brood table, based only on a few years of age class data from small sample sizes, has been used to establish an initial Chignik River system escapement goal of 1,450 fish (Owen and Sarafin, 1999a). To ensure the escapement goal is met, the department's inriver goal of 1,950 chinook salmon allows for a projected sport and subsistence harvest of 500 fish. If escapement in early July is weak and escapement goals are not likely to be met, the Hume's Point markers may be used to enhance escapement. Normally 50% of the chinook escapement passes through the weir by July 11. During 1999, 50% of the chinook escapement passed the weir by July 16 (Table 8).

31.) 1999 Chignik AMR

System: Chignik River

Species: Chinook salmon

Data available for analysis of escapement goals.



32.) 2007 Review of Escapement Goals in the Chignik Management Area, p.24

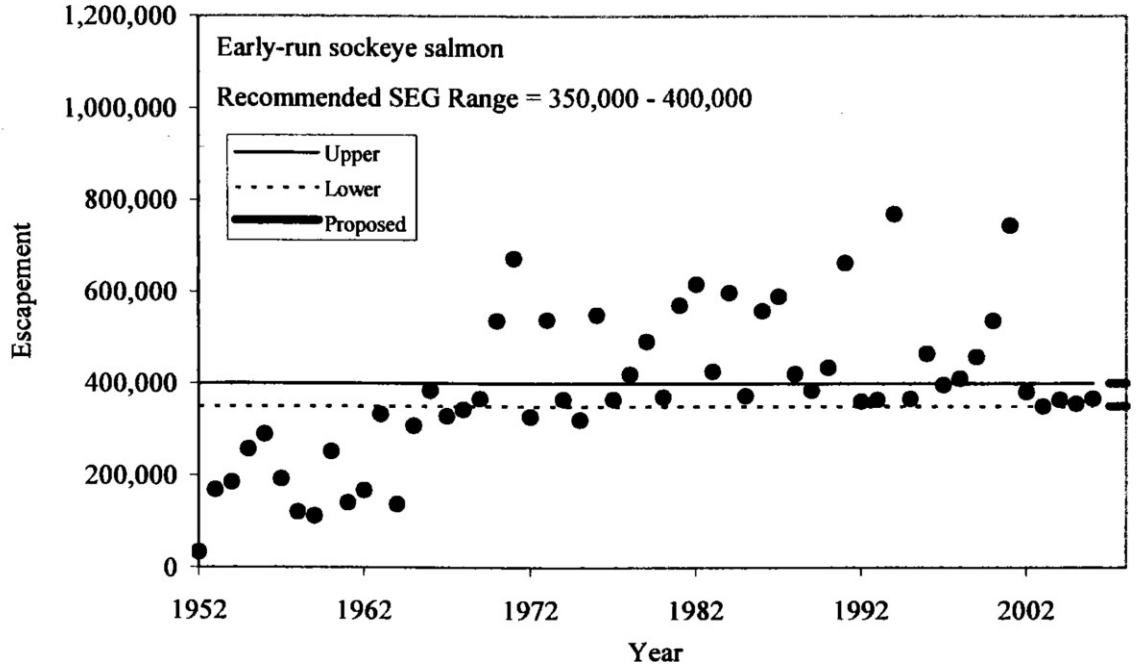
Biological sampling of the commercial red salmon catch in the Chignik Lagoon was again conducted for the purpose of furnishing data for the annual Chignik red salmon prognostication.

Close cooperation is maintained with the Fisheries Research Institute, who are currently conducting lacustrine and estuarian studies of the Chignik and Black Lakes red salmon run. Direct joint cooperation existed for conducting analysis of the lagoon biological sampling and the tag recovery of the Chignik River tagging program.

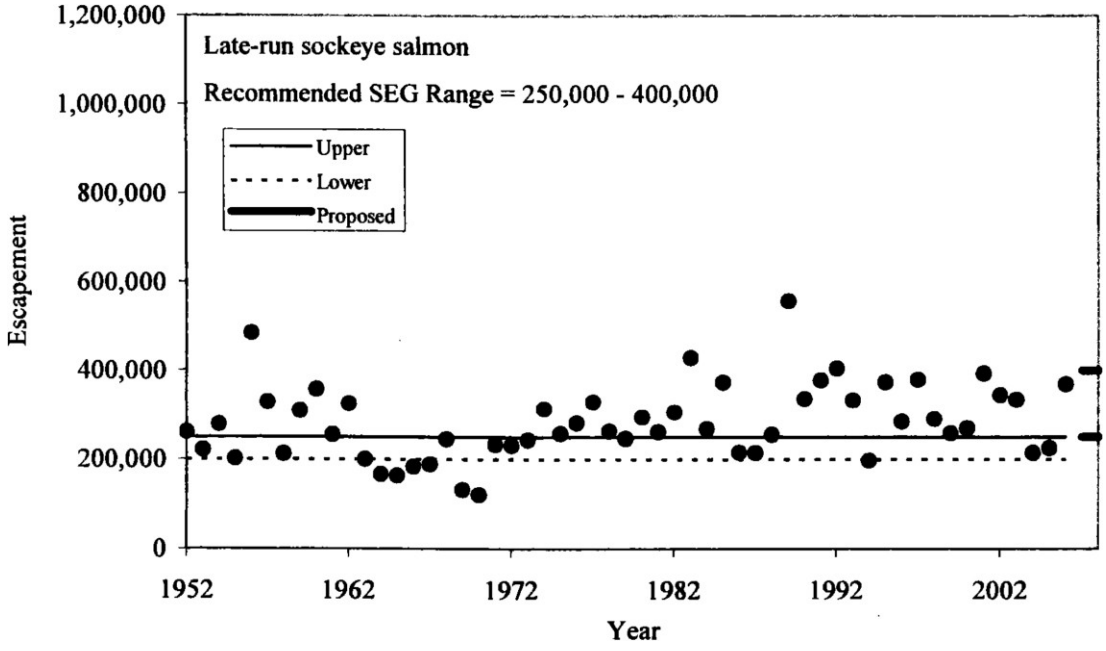
33.) 1963 Chignik AMR, p.20

In 1992 the ADF&G implemented an Escapement Goal Policy (EGP) that formalized the approach used to manage salmon fisheries on the sustained yield principle. The EGP documented the concepts, criteria, and procedures for establishing and modifying escapement goals. In addition, the EGP established a process that facilitated public review of allocative issues associated with establishing and modifying escapement goals. In 2001 the Alaska Board of Fisheries (BOF) adopted a modified version of the department's EGP into regulation. This new policy, 5 AAC 39.223. POLICY FOR STATEWIDE SALMON ESCAPEMENT GOALS, identifies the department's responsibilities regarding escapement goals. The first responsibility of the department is to document existing salmon escapement goals for all salmon stocks that are currently managed for an escapement goal. This document has been prepared to describe the establishment of currently applicable escapement goals for stocks of five Pacific salmon species (chinook *O. tshawytscha*, sockeye *O. nerka*, coho *O. kisutch*, pink *O. gorbuscha*, and chum *O. keta* salmon) spawning in the Kodiak, Chignik, and Alaska Peninsula/Aleutian Islands areas of Alaska.

34.) Escapement Goals for Pacific Salmon in the Kodiak, Chignik, and Alaska Peninsula Aleutian Islands Areas of Alaska (Nelson and Lloyd, 2001) Regional Information Report) No. 4KOI-66, p. 2

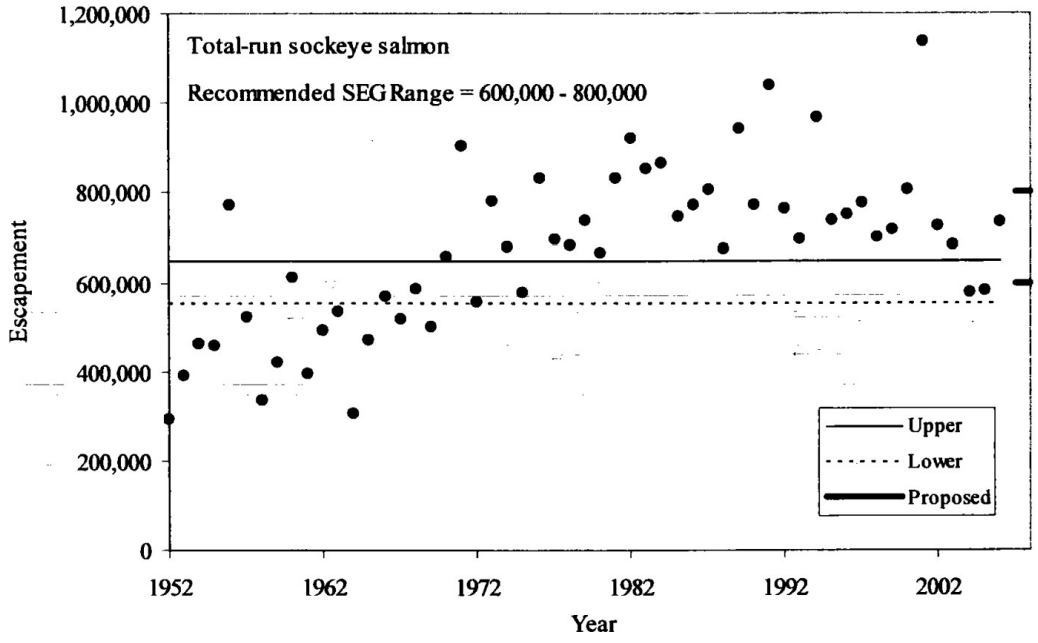


35.) 2007 Review of Escapement Goals in the Chignik Management Area, p.30



36.) 2007 Review of Escapement Goals in the Chignik Management Area, p.30

Appendix B2.–Page 4 of 4.



37.) 2007 Review of Escapement Goals in the Chignik Management Area, p.31

ALASKA DEPARTMENT OF FISH AND GAME

DIVISION OF COMMERCIAL FISHERIES

MEMORANDUM

TO: Patti Nelson
Regional Research Supervisor
Division of Commercial Fisheries
Region IV – Kodiak

DATE: April 17, 2002
PHONE: (907) 486-1805
FAX: (907) 486-1841

FROM: Kenneth A. Bouwens
Finfish Research Biologist
Division of Commercial Fisheries
Region IV - Kodiak

SUBJECT: Chignik Escapement

The purpose of this memorandum is to discuss preliminary data from the Chignik Lake Assessment Project in terms of the health of the sockeye salmon rearing habitat at Chignik.

Sockeye salmon escapements have been well in excess of escapement goals for the past 10 years. In 2000 and 2001, escapement goals were exceeded by 155 and 487 thousand sockeye salmon, respectively:

Year	Black Lake Escapement	Chignik Lake Escapement	Total Escapement
1992	360,681	405,922	766,603
1993	364,263	333,114	697,377
1994	769,464	197,445	966,909
1995	366,163	373,757	739,920
1996	464,750	284,387	749,137
1997	396,668	378,950	775,618
1998	410,659	290,469	701,128
1999	457,425	258,541	715,966
2000	519,661	285,614	805,275
2001	744,013	392,905	1,136,918
Goal	**350,000 - 400,000**	**200,000 - 250,000**	**550,000 - 650,000**

(38.) April 17, 2002 Chignik Escapement Memorandum pg.1

Patti Nelson
Chignik Escapement April 17, 2002

Preliminary limnology data from both Black Lake and Chignik Lake in 2000 and 2001 indicate that the forage base for sockeye salmon of the system was extremely taxed. Three lines of evidence suggest that the forage base has been overgrazed in both Black and Chignik Lakes:

1) Zooplankton species composition. *Bosmina* and *Cyclops* dominated the zooplankton and *Daphnia* were nearly absent in both Black and Chignik Lakes. Both of the dominant species are inefficient grazers and are poor transmitters of energy and nutrients through the food web, and are not preferred sockeye salmon forage. Their presence indicates high grazing rates by planktiverous fish.

2) Zooplankton size. The mean size of the available zooplankton is very small and below the elective feeding size threshold of sockeye salmon. This is further evidence that the zooplankton was heavily grazed.

3) Phytoplankton abundance. Chlorophyll *a* levels were extremely high in both lakes in both years. This is an indicator of a zooplankton community that is unable to transfer the energy and nutrients from the phytoplankton to sockeye salmon, indicating a bottleneck through top-down limitation of zooplankton production. The primary production of the system was high, but it was not transferred up the food web.

It is noteworthy, however, that preliminary stomach content analysis suggests that insects have been a major portion of the diet of rearing sockeye salmon in the Chignik watershed. Also, Chignik Lagoon has been identified as a major rearing area for juvenile sockeye salmon. These caveats may have buffered the magnitude of the effects that overgrazing of the plankton might have had.

Given the above evidence, it is recommended that the low ends of the escapement goals for both runs to Chignik should be targeted as management objectives in 2002.

cc: Lloyd
Campbell
Pappas
Witteveen

(38. continued) April 17, 2002 Chignik Escapement Memorandum pg.2

2012 CHIGNIK SALMON MANAGEMENT

ADF&G targeted the lower bounds of the sockeye salmon escapement goals during the 2012 season (Table 3) based on limnology data from 2000 through 2007 that suggested the forage base for juvenile sockeye salmon was depressed in Chignik Lake (Bouwens and Finkle 2003a, 2003b; Finkle 2005; Finkle 2006a, 2006b; Finkle and Bouwens 2001). ADF&G first adopted this practice in 2002 to improve juvenile sockeye salmon production by relieving grazing pressure on zooplankton in Chignik Lake (Bowens and Finkle 2003b).

(39.) 2012 Chignik AMR, p.3

Routine plankton sampling was conducted at five locations, three times during the summer in Chignik Lake. These three sampling periods coincided with the townet sampling periods. As in past years, the cyclopoid copepod *Cyclops* was by far the most abundant in the plankton samples (Table 4). Even though this plankter is not the largest of the Entomostracan species in the samples, it does occur more often in stomachs of sockeye and other limnetic-feeding fish than any of the other Entomostracans. Apparently the juvenile sockeye are quite well adapted to feeding on *Cyclops*.

(40.) Optimum Escapement Studies of Chignik Sockeye Salmon, 1973, p.14

2) Significant differences in food composition exist between lakes in all four fish species analyzed. Winged and larval insects are more abundant in the sockeye and stickleback diets in Black Lake than in Chignik Lake.

(41.) Optimum Escapement Studies of Chignik Sockeye Salmon, 1972, p.9

Percentile Approach

A SEG for Thin Point sockeye salmon was estimated according to the percentile algorithm using aerial survey escapement estimates from 1970 to 2003. High contrast in the escapement estimates and high exploitation of this stock resulted in an SEG of 7,475 to 22,325 (25^{th} to 75^{th} percentiles; Table 10).

Euphotic Volume Analysis

Based on average EV, the adult production of Thin Point Lake is expected to be roughly 78,000 sockeye salmon. A SEG of 19,000 to 32,000 sockeye salmon was estimated based on EV for Thin Point Lake (Table 7).

Smolt Biomass as a Function of Zooplankton Biomass

The zooplankton biomass for Thin Point Lake was very low. Depending on the size of the resultant smolt, the zooplankton model results in an estimated SEG of only 40 to 260 sockeye salmon for Thin Point Lake (Table 8). This model is probably not appropriate for Thin Point Lake because juvenile sockeye salmon are known to feed on non-zooplankton forage in shallow Alaska Peninsula lakes (Honnold et al. 1996; Bouwens and Finkle 2003).

Lake Surface Area

Based on the surface area of Thin Point Lake, Honnold et al. (1996) estimated the adult production of Thin Point Lake to be roughly 87,000 sockeye salmon annually. Based on this production level and an exploitation rate of 0.67, a SEG of 22,000 to 36,000 sockeye salmon was estimated for Thin Point Lake (Table 9). However, Honnold et al. (1996) suggested that this model may not be appropriate for shallow Alaska Peninsula lakes.

(42.) Review of Salmon Escapement Goals in the Alaska Peninsula and Aleutian Islands Management Areas, Report to the Alaska Board of Fisheries, 2004 p.21

Area M Seiners Association

PC10

Sand Point, Alaska

Board of Fisheries Finfish Meeting
February 20 - 25, 2023
Anchorage, Alaska

Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526
Email dfg.bof.comments@alaska.gov

RE: Comments by Area M Seiners for Alaska Peninsula, Aleutians, & Chignik Finfish Meeting, February 2023

Support Proposals 107, 108, 110, 112, 115, 116, 130, 131, 144, 145, 146, & 152;

Oppose Proposals 106, 109, 119, 120, 126, 128, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 148, 149, & 150.

Dear Chair Carlson-Van Dort and Board of Fish Members:

Area M Seiners submit these comments on proposals for the Alaska Peninsula, Aleutian & Chignik Finfish meeting pertaining to Area M salmon seine fisheries. Area M Seine Association is a 501(c)(6) not for profit corporation that represents the interests of fishermen, processors, tender men, crew, and families associated with Area M salmon fisheries. Area M Seiners look forward to working with the Board on proposals affecting our fisheries.

The commercial fisheries of Area M support many Native families and communities on the Alaska Peninsula. It is worth noting that many communities do not have significant local salmon runs that return to the Alaska Peninsula and thus, they rely on commercial harvests to provide for their families like other Native communities rely on subsistence. Many of these proposals attempt to pit commercial fishermen against subsistence fishermen by creating false narratives about the Area M commercial fishery and its participants. The majority of Area M salmon fishing permits are owned and used by Alaska residents, and specifically for Area M purse seine, AEB residents averaged 72% of the permits fished between 1980-2020[/1]

Proposal 107 Support. – 5 AAC 15.357 Expand opportunity for Chignik Management Area (CMA) in the Western and Perryville Districts during the period June 1 to July 5.

> The WASSIP data shows a mixed stock harvest of sockeye in the CMA Western and Perryville districts. This proposal would give CMA fishermen economic opportunities to fish on a mixed stock, as well as give the Alaska Department of Fish & Game (ADF&G) run strength data early in the season. However, this proposal suggests limiting the mixed stock openers to two-weekly 48-hour fishing periods.

Proposal 108 Support. – 5 AAC 15.357 Expand harvest opportunities based on run strength in the Chignik Management Area for the Eastern District during the June period, the July period and the post July 31 period, using specified test fisheries.

> This proposal would add regulatory language allowing a fishery in the CMA Eastern District from June 1 through June 25 that targets early run sockeye returning to Black Lake with at least two commercial test fishing periods of 33 hours. At the end of the transition period from June 26 to July 8, and until July 31 at least one test fishing period per week not to exceed 48 hours would be prosecuted. Finally, after July 31 during local pink, chum and coho management and/or Chignik sockeye there would be a provision for one commercial fishing period per week of 57 hours.
> The WASSIP data shows a mixed stock harvest of sockeye salmon in the CMA. Western and Perryville districts and ADF&G Fishery Manuscript Series No. 16-10 shows a mixed harvest of sockeye salmon in the Kodiak

Management Area (KMA) Cape Igvak section.[2/] The CMA Eastern district lies between these districts so it can be assumed that there is a mixed stock sockeye salmon harvest in the CMA Eastern district as well. To give CMA fishermen economic opportunities on a mixed stock as well as give the department run strength data, there should be limited openings in the Eastern district.

Proposal 110 Support. – 5 AAC 15.357 Chignik Area Salmon Management Plan. Amend the Chignik Area Salmon Management Plan to restrict commercial fishing periods in Chignik Lagoon until the escapement goal has been met.

We support this proposal to increase early run Chignik Lake sockeye escapement while maintaining harvest opportunities in the Central District. This action will help protect chinook in the Chignik Lagoon that are migrating to Chignik Lake. The ADF&G stock of concern memo states: "Chignik River king salmon must travel through the Chignik Lagoon where significant commercial, subsistence and sport fisheries occur and given the relatively confined area of the Chignik Lagoon and proximity to the river mouth, it can be assumed that the majority of king salmon harvested are of Chignik River origin."

Proposal 112 Support. – 5 AAC 15.357 Chignik Area Salmon Management Plan. Amend the Chignik Area Salmon Management Plan to reduce commercial salmon fishing time.

We support this proposal specifying management changes for the period July 9 – July 31. The WASSIP sockeye data from 2006 - 2008 shows that the CMA has mixed stock sockeye harvests. While the Eastern District was not included in the WASSIP analysis, studies cited by ADF&G show:

> "Based on historical June tagging studies, sockeye salmon tagged in the Eastern District were recovered in Chignik Lagoon, Cook Inlet, and Bristol Bay. Relative to the Central District and Cape Igvak, the stock composition of sockeye salmon in the Eastern District is likely variable depending on run timing."

During what is called the 'transition period' if openings were to occur, they would be restricted to terminal areas in the Eastern district. After July 31, management would return to status quo which consists of openings based on local pink, chum and coho salmon runs and/or strength of Chignik Lake sockeye run.

Proposal 115 Support. – 5 AAC 15.357 Chignik Area Salmon Management Plan. Amend the Chignik Area Salmon Management Plan so that pink, chum and coho salmon stocks in the Western and Perryville Sections of Registration Area L will be managed based on the strength of the pink, chum, and coho salmon stocks in the Stepovak and Shumagin Islands Sections of Registration Area M

We support this proposal to align adjacent areas – Perryville and Western districts to the east and Stepovak areas (SEDM & Shumagins) to the west, on a more equitable basis. Currently, local stocks can be harvested in Perryville and Western districts while Stepovak area is closed. These local stocks are still mixed stock in nature and tend to migrate westerly and therefore can be cut off in the Perryville and Western districts.

Proposal 116 Support. – 5 AAC 15.357 Modify Chignik Area Salmon Management Plan to manage Western and Perryville Districts in Area L based on strength of the pink, chum, and coho salmon stocks in the Southeast District Mainland (SEDM) of Area M.

It is well known that during the July 25 -September 30 period, local SEDM pink, chum, and coho stocks are intercepted in the Perryville and Western districts of Area L. This proposal addresses years when local SEDM pink, chum, and coho stocks are not achieving escapement goals, and should result in closing Perryville and Western districts. Additionally, there would be at least one 48 hour closed period per week in the Perryville and Western districts.

In recent years, SEDM fishermen have been shut down due to low numbers of westward returning local stocks while Chignik fishermen are fishing seven days per week, catching high numbers of pink and chum destined for the SEDM area. This is a significant conservation issue that needs to be addressed.

Proposal 130 Support. – 5 AAC 09.360 Southeastern District Mainland Salmon Management Plan. Amend the Southeastern District Mainland Salmon Management Plan to allow more fishing time in the Northwest Stepovak Section

We support this proposal to allow additional fishing opportunities while still supporting the escapement goals and conditions of Orzinski lake sockeye. Although ADF&G is neutral on this proposal, it states: "Having the ability to manage Orzinski Bay continuously after July 25, especially in years when Orzinski Lake has strong and late escapement, this would be a valuable management tool."

Proposal 131 Support. – 5 AAC 09.360 Southeastern District Mainland Salmon Management Plan. Amend the Southeastern District Mainland Salmon Management Plan to allow commercial salmon fishing with set gillnet gear, and after July 11, purse seine gear concurrent to open commercial fishing periods for salmon in the Chignik Management Area

We support this proposal which would allow set gillnet gear from June 1 through July 25 and allow seine gear after July 11 and through July 25 in the SEDM of the Southeastern district, which would be concurrent with commercial fishing periods in Chignik Management Area (CMA). If adopted, this proposal could benefit setnet fishermen in June and July, while seiners would benefit after July 11 in years when the Chignik run is strong. This proposal removes CMA harvest thresholds of 300,000 and 600,000 which in turn would allow earlier fishing by the setnet fleet. The intent of this proposal is to create a more equitable balance between the SEDM and CMA fisheries without creating a conservation concern for Chignik sockeye as all other regulations remain in place.

Proposal 144 Support. – 5 AAC 09.366 Post-June Salmon Management Plan for the South Alaska Peninsula. Amend the Post-June management plan to allow for fishing periods beginning August 1 in Southeastern and South-Central Districts to increase pink salmon harvest opportunities during periods of high abundance.

We support this proposal which increases pink salmon harvest opportunities in years when the pink salmon forecast is above 3 million. The change would provide ADF&G with the option to have two 36- hour openers per week beginning August 1st in the Southeastern and South-Central districts. Allowing an early August opening would provide ADF&G with better information at a time of year when aerial flights/surveys can be difficult because of frequent inclement weather. The August pink salmon fishery is an important economic component to the communities and fishermen of the area.

Proposal 145 Support. – 5 AAC 09.366 – **Post-June Salmon Management Plan for the South Alaska Peninsula**. Amend regulation to provide a modest increase in fishing time during the post-June period.

We support this proposal to increase fishing time for the Post-June period. The first opening would be unchanged, that is a 33 hour opening on July 6 followed by a 63 hour closure. Beginning July 10 Section (d) (1) commercial fishing periods will begin at 6:00 a.m. and close at 10:00 p.m. the following day (40 hour opening), followed by a closure of 56 hours. This would repeat for the remainder of July with 40 hour openings followed by 56 hour closures.

Proposal 146 Support. – 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula. Amend post-June regulation to increase fishing periods by 24 hours after July 10 and the time between each period is reduced by 24 hours until the end of July.

We support this proposal to increase fishing time on local stocks in the Post-June period when Bristol Bays stocks have already passed through and the Chignik sockeye early run has mostly transited the area.

Proposal 152 Support. – 5 AAC 09.350 Amend the closed waters boundary in Stepovak Bay to increase commercial fishing area.

We support this proposal by our local Sand Point Advisory Committee. This proposal asks to reduce closed waters to commercial fishing in Stepovak Bay for the period July 29 to September 30, a period when local pink and chum stocks predominate in Stepovak Bay. This proposal would provide modest opportunities for local fishermen, while protecting local pink and chum systems. Altering 5 AAC 09.350 will allow ADF&G to open the area when conditions are favorable to assessing pink and chum run strength, however in years when murky water

conditions prevail this area may remain closed. Currently there is no opportunity to harvest even when ADF&G has no conservation concerns.

Area M Seiners Association opposes the following proposals:

Proposal 106 Oppose. – 5 AAC 15.357. Chignik Area Salmon Management Plan Amend the Chignik Area Salmon Management Plan to increase in-river escapement of sockeye salmon prior to opening a commercial fishery.

This proposal limits ADF&G's flexibility to optimally manage sockeye escapement and conduct early commercial openings. If adopted, this proposal would delay fishery openings in the event there is a strong early run component. At this meeting ADF&G will present an action plan for Chignik stock of concern, as well as ask the Board to consider designating Chignik sockeye as a single stock rather than its current early/late run designation. Therefore, it seems prudent to maintain the status quo of 5 AAC 15.357.

In 2022, Chignik had an early run escapement of 412,228 sockeye and a late run component of 395,858 sockeye, which was better than the past ten-year average of 350,000 for each the early and late run components. In addition, there was a commercial harvest of 334,704. We agree with ADF&G in opposing this proposal.

Proposal 109 Oppose. – 5 AAC 15.357. Chignik Area Salmon Management Plan Amend the Chignik Area Management Plan to allow period openings to harvest more salmon in the Central District and repeal the in-river run goal in August and September.

This proposal would result in reducing commercial harvest opportunities if Chignik escapement goals are being met in August and September. Overall, this proposal would limit ADF&G's available management actions and could contribute to over-escapement of late run Chignik sockeye, further taxing a system that is under stress due to environmental changes at Black Lake. One aspect of this proposal—removing the maximum opening duration of 48 hours—could be beneficial in years when the run is very large.

Proposal 119 Oppose. – 5 AAC 15.330. Gear, 5 AAC 15.33X. Troll specifications and operations. Amend allowable gear in the Chignik Management Area to include troll gear.

This proposal has state-wide implications relating to the Pacific Salmon Treaty and current regulations restricting commercial trolling east of Cape Suckling to the international boundary at Dixon's Entrance. Introducing a new gear type into an area that is fully allocated is unwarranted and ill-advised at this time.

Proposal 120 Oppose. – 5 AAC 09.320. Fishing periods. Modify fishing periods in the Northern District.

This is a radical proposal that would significantly alter current abundance-based management, with the likely result being over-escapement in many of the sockeye systems along the Northern District from Bear River section to Outer Port Heiden. In 2022, conservative management along sixty miles of the Northern District limited time and area which ultimately resulted in meeting the lower end of the Nelson Lagoon escapement goal. All other sockeye systems in the Northern District were within or above their escapement range.

This proposal would severely reduce harvest opportunities without necessarily benefiting Nelson Lagoon. Salmon stocks, including those returning to Nelson Lagoon, occasionally experience low productivity years. But as long as minimum escapements are met, systems rebound. Nelson Lagoon had low productivity for a couple of years in the 1970s and it recovered within a few years of its low point. There is no data suggesting that the same kind of rebound is no longer possible.

Proposal 126 Oppose. – 5 AAC 09.350 Closed waters and 5 AAC 09.369 Northern District Salmon Fisheries Management Plan. Amend closed waters and Northern District Salmon Fisheries Management Plan to reduce commercial salmon fishing time and area in the Outer Port Heiden Section.

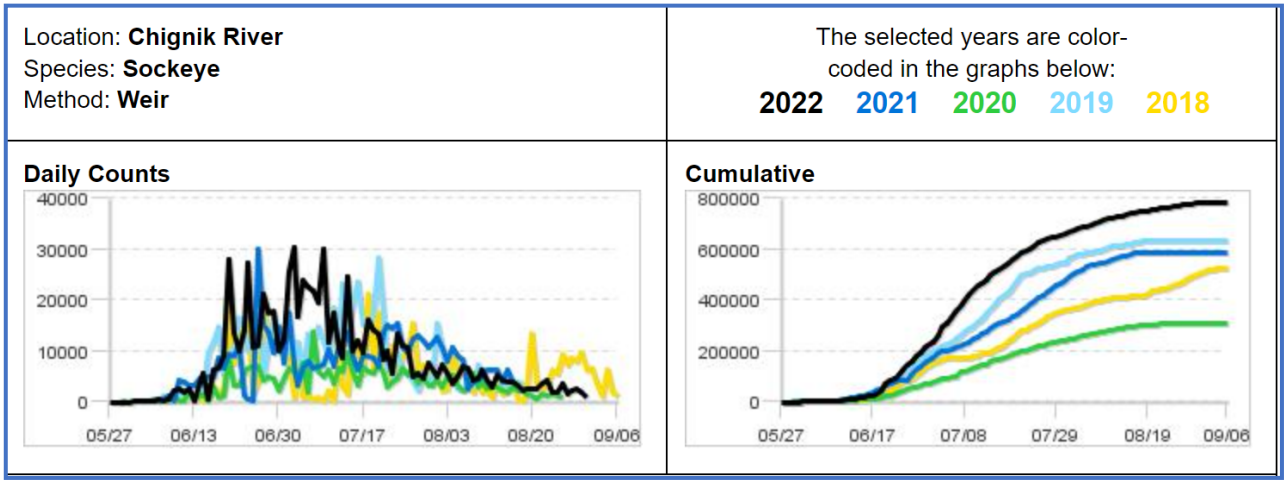
This proposal is a simple grab for sockeye by reducing area in the Northern District and shifting those fish to the lower Bristol Bay fishery. The proposer suggests this proposal would result in the harvest of more local Northern District stocks. However, the proposer could just have suggested instead maintaining the existing area but increasing fishing time specifically near the Meshik River if the primary result sought was to increase the Meshik sockeye harvest.

Proposal 128 Oppose. – 5 AAC 05.331. Gillnet specifications and operations. Amend Gillnet specifications and operations to reduce commercial salmon harvest in the North Peninsula using gillnet depth reductions.

This proposal's desired effect is to reduce sockeye harvest in the Northern District by reducing drift net maximum depth. It is expected that less harvest will result in greater returns to Nelson Lagoon. That may be one effect, but it is more likely that Nelson Lagoon is experiencing a modest productivity event that will rebound as long as minimum escapements are met at Nelson Lagoon, which it did in 2022. An unintended consequence of reducing harvest is likely over-escapement in all other Northern District sockeye systems. Maximum sustained yield would be reduced to some lower yield, although sustainable.

Proposal 133 Oppose. – 5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan. Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing by time and area for purse seine gear with the goal of increasing Chignik sockeye escapement.

We oppose this proposal, which is predicated on Chignik sockeye having early- and late-run components and that escapements have not been met in the past several years, which was not true in 2022. In support, it asserts that, under the 2004-adopted management plan, Chignik-bound sockeye were harvested continuously throughout the month of June as they pass the Southwestern District, the West and East Pavlof Bay Sections of the South Central District, and the Shumagin Islands. The assertion that the 2004 -2022 management plan has continuous fishing (544 hours) in June is patently wrong. The June plan does not begin until June 10 at which time it has four 88 hour openings with 32 hour closures between openings. Total possible hours open in June is 352 not 544. The proposal further asserts that this has resulted in heavy interception of Chignik-based sockeye, which are abundant in the area at this time. However, no data are presented to support these claims.



Graph 1. Chignik sockeye escapements 2018 - 2022

Concessions on fishing time and area have already been made in SEDM June fishery to help pass more sockeye to Chignik Lake. ADF&G has proposed that Chignik be considered a single stock, and the Board is considering adopting the single stock model based on ADF&G's analysis. The BEG analysis generates a lower bound of 450,000 sockeye and an upper bound of 800,000 sockeye salmon.

Table 1.– Estimated Chinook, sockeye, coho, pink, and chum salmon, and Dolly Varden escapement to the Chignik River, 2010 to 2022.

	Escapement						
	Chinook[a]	Sockeye		Coho	Pink[c]	Chum	Dolly Varden
Year		Early-run	Late-run[b]				
2010	3,679	432,535	310,634	5,152	3,670	95	17,578
2011	2,728	488,930	264,887	5,293	16,298	145	19,225
2012	1,449	353,441	358,948	2,663	2,849	73	18,032
2013	1,253	386,782	369,319	16,783	7,231	72	17,230
2014	2,895	360,381	291,228	15,572	3,171	58	44,899
2015	2,054	534,088	589,810	60,209	4,269	54	16,346
2016	1,843	418,290	337,698	14,187	486	114	24,625
2017	1,137	453,257	339,303	33,270	123,531	615	7,664
2018	825	263,979	275,718	64,214	3,222	54	4,550
2019	1,517	345,918	336,077	282	18,073	67	6,242
2020	1,278	137,213	193,765	6,964	10,614	124	4,919
2021	1,172	244,382	396,756	0	6,057	25	4,363
2022	761	412,228	395,858	10,903	12,558	90	1,238
Averages							
2012–2021	1,542	349,773	348,862	21,414	4,068	126	14,887
2017–2021	1,186	288,950	308,324	20,946	6,918	177	5,548

[a] No escapement adjustments were made for Chinook salmon that spawn below the weir, or those removed by the sport and subsistence fisheries above the weir.
[b] Late-run sockeye salmon totals include a weir estimate and post-weir escapement estimate using a time series analysis.
[c] Pink salmon averages include even years only.

Chignik Lake sockeye aggregated escapements from 2018 to 2022 show only one year, 2020, with an escapement below the lower bound of 450,000 sockeye. In 2022, 808,800 sockeye were counted through the Chignik weir, while the commercial Chignik fishery harvested 334,000 sockeye.

Therefore, this proposal does not have merit based on its argument as presented. This proposal requests additional time and area reductions in the Shumagin Management Plan to benefit Chignik sockeye. These reductions to the Shumagin seine fishery will not improve Chignik sockeye productivity. As noted in the ADF&G memorandum from K. Schaberg ADF&G research biologist to the director of commercial fisheries division April 8, 2022:

> Analyses of new information indicated notable changes to the rearing habitat and life history strategies of Chignik River sockeye salmon. Specifically, at the Black Lake Workshop hosted by the U.S. Army Corp of Engineers (USACE), November 3-4, 2021, the USACE revealed that the Chignik River watershed had stabilized around the year 2000. Studies initiated in 2011 identified that climate drives rearing early-run juvenile sockeye salmon from Black Lake, to rear throughout the entire watershed (Walsworth et al. 2015, Walsworth et al. 2020),[3/ 4/] with late-run juveniles outcompeting early-run juveniles when both overlap rearing in Chignik Lake (Griffiths et al. 2013)[/5]. With watershed morphology stabilized and greater variability in recent climatic conditions, it is unlikely that the utilization of the entire watershed by early-run juvenile sockeye salmon will change.

Habitat changes are the likely driver of Chignik sockeye productivity, not Shumagin interception.

Proposal 135 Oppose. 5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan. Change regulation to adopt a June management strategy based on a sockeye harvest ratio of 18% Shumagin to 82% Unimak sockeye.

This proposal is predicated on concern for Chignik sockeye, specifically June sockeye in the Shumagin Island area that may be moving northeastward. Currently there are provisions in the regulations to allow passage of sockeye to Chignik. For example, the Dolgoi Island area is monitored by means of in-season fish ticket data. Once

the harvest of sockeye salmon reaches 191,000 , the waters of the West Pavlof Bay Section south of Black Point and the waters of Volcano Bay Section will close to commercial fishing for the remainder of June.

In 2022 season, ADF&G did implement restrictions during June as per regulations. Due to restrictions and the strength of the Chignik sockeye run, ADF&G opened Chignik commercial fishing, resulting in an area-wide harvest of 334,347, while at the same time providing an escapement of 808,800 sockeye. In 2022, both the early and late run goals were met, as were the in river run goals for August and September.

Post-June management actions include an immature test fishery per **5 AAC 09.366 (i)** which if greater than 100 immature salmon on average are gilled in the test fisher's seine net, the commercial fishery will be closed. The Dolgoi Island area harvest continues to be monitored through fish ticket reports with a cumulative maximum harvest of 191,000 sockeye for the June and July period, which is the threshold to close fisheries in West Pavlof Bay Section and Volcano Bay Section until July 26. These regulatory actions are adequate to protect Chignik Lake sockeye in terms of escapement and harvest.

We oppose Proposals 134, 139 and 140, which are essentially the same proposal to repeal the current South Unimak and Shumagin Islands June Salmon Management plan and replace it with some version of the pre-2004 regulation. We also oppose Proposal 136, which proposes instituting a chum salmon harvest cap of 280,000 for the June fishery, and Proposal 137, which seeks to reduce the June fishery to 100 hours based on there being six regional fisheries from Alaska Peninsula to the Arctic and Area M should therefore have 1/6th the time during the June period.

Our reason for opposing these five proposals is essentially the same: they are not supported by the best available evidence, which demonstrates that Chum salmon declines in AYK-area rivers cannot be attributed to the Area M June fishery.

Proposal 134 (5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan. Repeal regulation and replace with 09.365 regulation of approximately 2002) and **Proposal 139 (**5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan. Amend the regulation to restrict commercial fishing time by rescinding current 09.365 regulation and adopting the 2001-2003 regulation**)** are not specific as to what new regulations would look like except that they should be the same regulation that was in force around 2002. Both proposals also request inclusion of Chinook and coho salmon into the management plan. Both proposers suggest that doing so would contribute to conservation and escapement of AYK chum salmon. However, the proposers provide no data whatsoever to support its assertions that restricting Area M fisheries will improve AYK chum escapement.

Furthermore, no data was provided to support any change in the regulation to include Chinook and coho runs. Chinook escapement in the Kuskokwim has met or exceeded the SEG in all recent years. (ADF&G, Kuskokwim River Salmon Fishery Announcement #8, 10-24-22 at Table 1)[6/]. From 2013 to 2022, the South Alaska Peninsula June Fishery annual harvest averaged 8,318 Chinook, and 2,898 coho, all headed to different rivers and drainages, thus making it highly unlikely that Area M harvest of AYK-bound Chinook and coho has any meaningful impact on any single run. (ADF&G, SP 23-07 at Table 1).[7/]

Proposal 140 is more specific, providing regulatory language providing a maximum of 3 days of fishing per week, a maximum of 16 hours of fishing per day, 48 hours of consecutive fishing in any one week, and a maximum of two consecutive 16-hour periods in any seven-day period.

Proposal 140 refers to decreases in Yukon River fall chum runs. There is no evidence that the Area M June Fishery takes significant numbers of Yukon River fall chum (table below); the timing and location of the fishery is wrong for intercepting fall chum. Thus, reducing time in the June fishery will have no impact on Yukon River fall chum. Proposal 140 also refers to Alaska's failure to meet its Treaty obligations with Canada. However, Canadian-origin Yukon River chum are almost exclusively fall-run, (https://www.yukonriverpanel.com/about-us/yukon-river-panel/yukon-river-salmon/chum/),[8/] so again, reductions in the Area M June fishery would not make a significant difference in Canadian-origin returns. Proposer produces no evidence or documentation to the contrary.

District Area	Stock group	June		July		August (South AK Pen combined)	
		Stock Compostion	Harvest	Stock Composition	Harvest	Stock Compostion	Harvest
SE & South Central District							
Tables 11,18, 25 from 2023 ADF&G	Upper Yukon	0.10%	**144**	0%	**27**	0%	**13**
Unimak & SW Districts							
Tables 14, 21 from 2023 ADF&G genetic report	Upper Yukon	0.30%	**1,208**	0%	**6**	combined South Pen above, not broken out	

Table 2. Yukon fall chum harvested in Area M districts for June, July, & August 2022 was 1,522 fish. (source ADG&G SP23-07)

Proposal 140 alleges a "direct correlation between the high harvest of chum in Area M to the loss of chum escapement to the AYK and a total loss of chum subsistence harvest." The proposer cites no evidence to support this, only repeating that the Area M fishery harvested 1.168 million chum in 2021. There is no evidence whatsoever that all of those chums were headed for the AYK.

The best available science (WASSIP[9/] and the 2022 genetic study discussed above) directly contradicts proposer's assumptions. These studies confirm that harvest rates on any individual run are very low, and the 2022 study demonstrates that the majority of chum caught in the Area M June fishery are of Asian origin (58%).
There is no evidence that AYK chum returns are impacted by Area M regulations. Looking at the historical AYK escapement and harvest of the past twenty years, there does not seem to be a strong relationship between Area M regulations and AYK chum productivity or harvest and escapement. Looking at escapement for the Yukon River, which has a total drainage-wide summer run BEG range of 500,000 to 1.2 million, is informative with regard to these proposals.

Totals to Date for Pilot Station Sonar Chum Salmon - Summer Run data from ADF&G website October 4 2022

	1995	1995	1997	1997	1998	1998	1999	1999	2000	2000	2001	2001	2002	2002	2003	2003	2004	2004
	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*
Season Totals	3,620,102	103,791	1,359,117	65,162	824,901	64,599	969,459	77,802	448,665	23,679	442,546	24,208	1,097,769	51,097	1,183,009	60,649	1,344,213	49,946

2005	2005	2006	2006	2007	2007	2008	2008	2009	2009	2010	2010	2011	2011	2012	2012	2013	2013
Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*
2,570,696	78,640	3,780,760	155,452	1,875,491	74,394	1,849,553	68,542	1,477,186	69,895	1,423,372	89,356	2,051,501	77,486	2,136,476	79,036	2,849,683	114,602

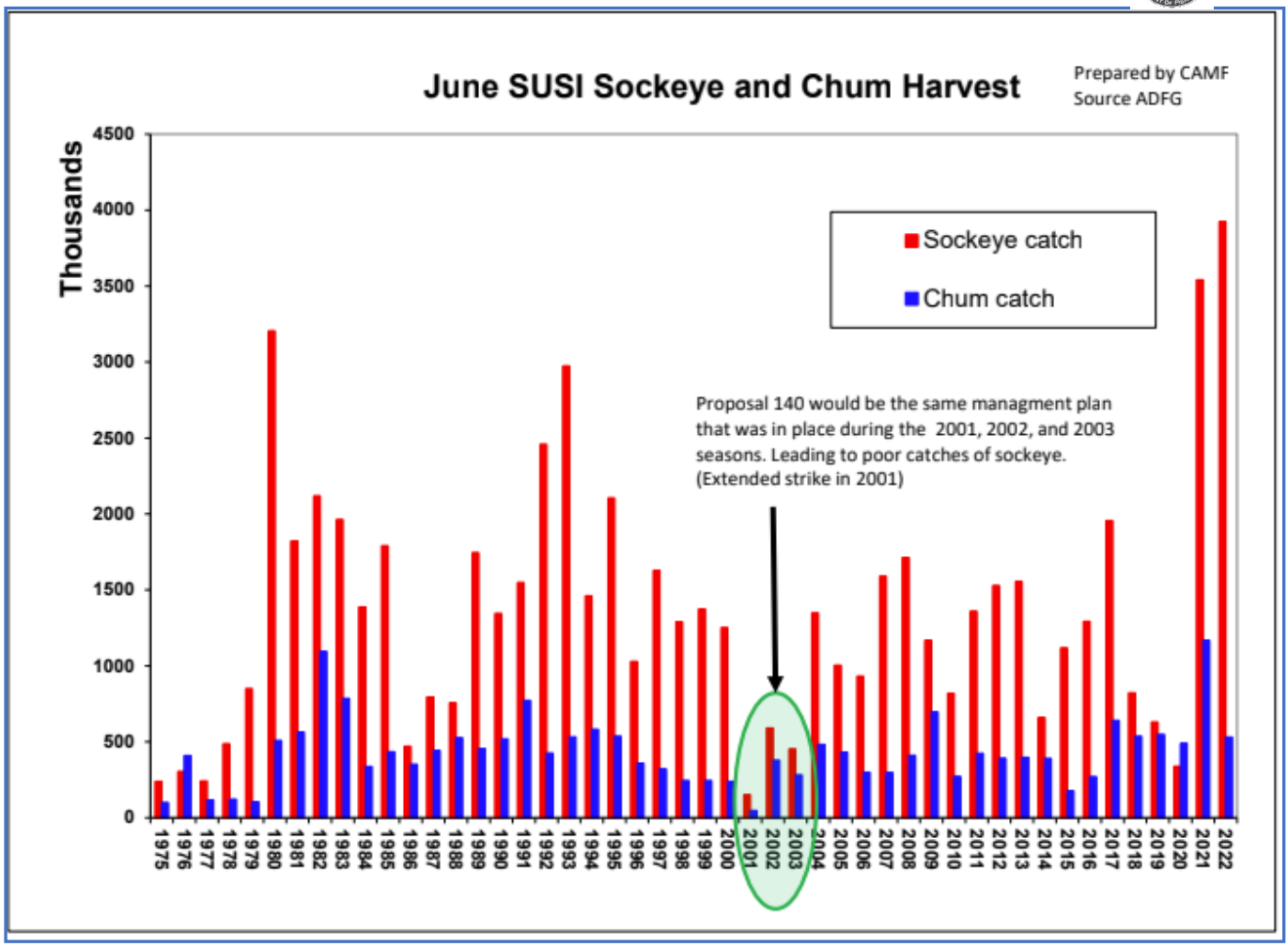
2014	2014	2015	2015	2016	2016	2017	2017	2018	2018	2019	2019	2020	2020	2021	2021	2022	2022
Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*	Count	+/-CI*
2,020,309	98,909	1,591,505	98,413	1,921,748	86,055	3,093,735	157,439	1,612,688	107,348	1,402,925	85,902	692,602	36,325	153,718	16,149	437,032	24,286

*Pilot Station Escapement uses 90% confidence intervals. Other projects use 95% confidence intervals.

Table 3. Yukon River escapements from 1995 to 2022. Blue connotes within or above escapement goal, Orange connotes below lower bound of escapement goal [10/]

During the pre-2004 era, which the proposers suggest is the preferred time period for borrowing a management plan, Yukon River escapement data shows that the lower bound was not met in two of the six years (coded orange) between 1995 to 2001. Escapement was less than a million chum in two additional years (1998 and 1999).

Contrast that with the 2004 to 2019 period which was under the 2004 to current era Area M management plan. In the period 2004–2019, all sixteen years had escapement levels over the upper bound of 1.2 million. This sixteen-year period constitutes at least three chum life cycles, of which many broodyears were quite productive. Also, of note during this period is that the highest escapement from 1995-2022 occurred in 2006 at 3.78 million chum and in seven of the years the escapement was over two million. The cause ("relaxed" Area M fishery regulation post-2004) and effect (impacts to AYK chum runs) the proposers suggest is just not there. It is well-known that the annual Yukon summer chum run has strong cycles of high and low abundance over the long term. ADF&G, FMS 15-07 at p. 15 (2015) [https://www.adfg.alaska.gov/fedaidpdfs/fms15-07.pdf] [11/]



Graph 2. Area M June catch of chum and sockeye from 1975 – 2022. Harvest in 2001 was a fisheries strike year, while 2002 & 2003 show low sockeye harvests but near average chum harvests

We sympathize with the extremely difficult situation the people of the AYK area face, and we would like to help with a solution, but as the late Senator Stevens said "trading one of Alaska's resources for another is not a solution," especially when the science and management of ADF&G and NOAA Fisheries suggests imposing restrictions on Area M will do little to rehabilitate AYK chum productivity. Both agencies point to number of culprits – the AYK near-shore ocean environment, poor health and condition of juvenile chum, Bering Sea warming, and poor survival and condition of CWAK chum stocks in their first, second, and third years in the ocean.

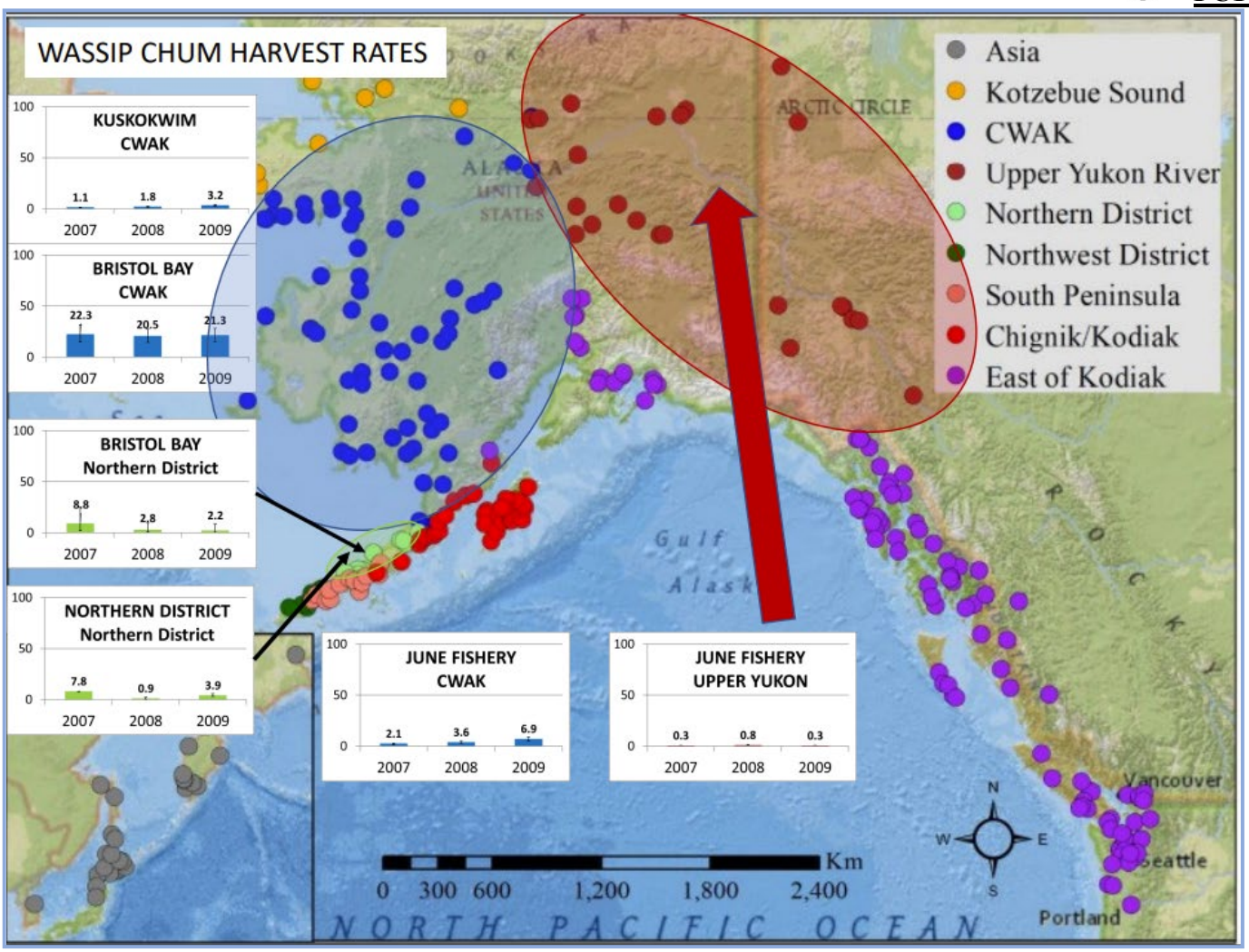
The AYK adult chum returns declined significantly in 2020, and were very poor in 2021, but had a modest uptick in 2022. The Pilot Station sonar estimated 463,806 summer chum salmon in 2022, the fourth lowest escapement but a dramatic improvement over 2021's 154,000 chum. Those chum were from the 2015 to 2017 broodyears, which coincided with the Blob in the Pacific Ocean and high ocean temperatures in the Bering Sea. It is well noted in the literature that this warming period resulted in very low productivity of secondary producers or zooplankton. The shift resulted in less nutritious, less fatty zooplankton during the critical rearing years 2016-2019. ADF&G research found that good numbers of Yukon chum fry emigrated to the ocean during these years, but they entered a poor rearing environment. Early marine studies in the life history of salmon clearly demonstrate that the first 30 to 45 days of a chum or pink salmon fry are harsh. Karpenko and Parker found that fry experience 50% to 90% mortality during that first month and a half of ocean life.[12/, 13/]

An international fisheries research program samples juvenile salmon on an ocean wide grid protocol, testing for health condition, size, genetic markers (WASSIP basis)[14/], and abundance. What has been learned is that the

Coastal Western Alaska (CWAK) chum stock (Bristol Bay to AYK and Norton Sound) entered their first ocean-year in poor condition and for those that survived their second and third years, they were observed to be thin or skinny, had low fat content and much of their diet consisted of gelatinous prey.

The best available data using WASSIP genetic stock identification from 2007-2009 show Area M fisheries have very low harvest rates on CWAK stocks (which includes runs originating from 800 miles of coastline from Bristol Bay to Norton Sound). WASSIP aggregated all Central Alaska chum stocks, including AYK and Bristol Bay to a single genetic stock group. The impacts on any particular run are likely proportional to abundance, as ADF&G has explained, and WASSIP indicates impacts on the order of about 5% of any one run. The WASSIP study found that the Alaska Peninsula *harvest rates* on the CWAK Reporting Group, including Norton Sound, the Yukon, Kuskokwim and Bristol Bay, were relatively small. Combining the Shumagin Islands Section, Dolgoi Island Area, Ikatan Area and Unimak District, the harvest rates in the June Alaska Peninsula fisheries on the CWAK group were 2.2% in 2007, 3.5% in 2008 and 6.9% in 2009. Harvest rates at those levels cannot account for the loss of 1.5 to 2.0 million Yukon River chum salmon. In 2004, looking at similar data from the 1987 tagging study and the mid-1990s genetic studies, the Board of Fisheries found that "the June fishery is a low impact fishery with very low harvest rates (in the low and mid single-digit range, percentage-wise) on the separate stocks involved." (Board of Fisheries Finding # 2004-229-FB at 2)[15/]. The Board "agree[d] with prior boards which have found that the impact of the June fishery on specific stocks of AYK chum salmon is negligible and that reducing the chum harvest in the fishery would not produce detectable results or measurable benefits to AYK chum runs. (c.f., board finding # 96-164-FB)." *Id*. at 4[16/]. These harvest rates for Area M fisheries include not just AYK chum in these low harvest rates but also Bristol Bay and Norton Sound chum which are part of the CWAK stock group.

In fact, if one looks at the Bristol Bay harvest rates on CWAK stocks the WASSIP report shows harvest rates of 20.5% to 22.3%. Some of those chum would have been headed to Bristol Bay systems; however, some would have been headed further north. The most northern and western Bristol Bay district is Nushagak with a harvest of 400,000 to 750,000 chum during the WASSIP study years 2007-2009; of which 8.2% to 12.2% were CWAK stocks. The closer the harvest to the Yukon, the more likely Yukon stocks will be in the harvest, especially in a June fishery. Thus, Area M fisheries are only one of several that intercept AYK-bound salmon and, as the most recent study confirms, those interceptions cannot cause the chum declines seen in the AYK.



Graph 3. WASSIP calculated harvest rates for CWAK and Fall Yukon chum in Area M fisheries for years 2007-2009. Bristol Bay harvest rates for CWAK included, ranging from 20.5% to 22.3%

The 2022 chum salmon genetic study results, published in January 2023, show that on a harvest of 544,064 chum in Area M during the June drift and seine fisheries, 17.7% (96,116 chum) were of CWAK origin. **The majority of chum in the June harvest were of Asian stock (58%)**. These 96,116 CWAK chum were destined for Bristol Bay, Kuskokwim, Yukon, Norton Sound and smaller drainages along 800 miles of coastline. ADF&G has not finished analyzing these results to parse the distribution and harvest rates of the CWAK group. The larger portion of the 96,116 were likely headed to Bristol Bay as it is closest to the fishery and had a 2022 harvest and escapement of 473,800 chum just in the Nushagak, which does not include harvest and escapement in the other major Bristol Bay systems. In fact, some percentage of Nushagak's 301,800 chum harvest would have been migrating further north, including to the Yukon.

Furthermore, the large amount of immature Asian chum caught in the June fishery suggest yet another potential reason for AYK chum declines. Recent scholarship shows that "smaller adult length-at-age, delayed age-at-maturation, and reduced productivity and abundance of the Norton Sound [chum] salmon population were associated with greater production of Asian hatchery chum salmon," and that those findings "indicate that competition with hatchery chum salmon contributed to the low productivity and abundance of Norton Sound chum salmon." (Ruggerone, G.T., et al.)[17/]. The high abundance of Asian chum in the Area M fishery at the same time that CWAK summer chum are present suggests that competition between Asian and CWAK chum for prey has a negative impact on CWAK chum abundance.

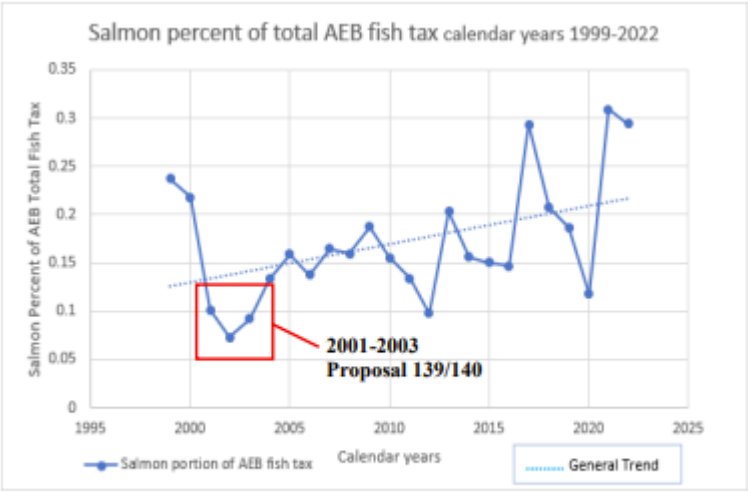


Figure 5. Proportion of AEB fish tax revenue generated by salmon between 1999-2022.

The economic impact of Proposal 140 could be expected to be similar to when the 2000 – 2003 June management plan was in place (Fig 5.) The Aleutian East Borough (AEB) lost significant salmon tax revenue and fishermen participation declined by 37.2% fewer permits.

Using much of the same logic as Proposals 134, 139 and 140, **Proposal 136** asks the Board to adopt a cap of 280,000 chum salmon for all gear types during the June fisheries, and to close the commercial fishery for the remainder of June once the cap is met. The proposer asserts concerns over "weak Yukon River fall chum runs," and that the Alaska Peninsula "is one of six fisheries on the migratory path of CWAK chum salmon." Proposer further asserts that the South Unimak and Shumagin Islands June fishery "should account for approximately one 6th of the chum salmon [harvest] for the season." Similarly, **Proposal 137** would reduce the current June fishing periods from a total of 352 hours to 100 hours, a 65% reduction in fishing time. The proposer predicates the time reduction based on there being six fisheries north of Area M where the CWAK chum are heading, and therefore Area M should get 1/6th the time. The 100 hours proposed would be staggered through the month of June, with six 16-hour openings and one 4-hour opening. The proposer points to 2021 commercial harvest of chum during the June fishery as a direct cause of low Kuskokwim and Yukon River subsistence harvest that same year.

First, references to Yukon River Fall chum are misplaced since all available evidence indicates the June fishery has almost no impact on Yukon River Fall chum (See Table 2, page 8 herein). Second, ADF&G recognized that existing data suggests "the 2021 Western Alaska chum salmon run failure was the result of increased mortality during ocean rearing, not mixed stock fishery harvests in distant waters." (ADF&G Memo to Board re Orutsararmiut Native Council Emergency Petitions, 5-10-22) [18/]. This is because both the 2021 and 2022 chum returns were the product of previous years' spawning escapements that fell within established escapement goals. This proposal does not recognize the most fundamental reasons that AYK chum stocks are doing poorly – poor survival in the near shore marine environment and in the ocean as one-, two-, and three-year-old immature chum,. Third, all available data contradicts the assertion that the June fishery takes 1/6th of the chum returning to AYK river systems. The low harvest rates in June Area M fisheries is far down the list as a contributing factor for poor AYK chum returns.

Area M seiners introduced a voluntary program in 2022 with a goal of reducing chum harvest while targeting sockeye. This voluntary program included moving off chum hotspots once they were known and standing down from fishing multiple times. It is estimated that there was a 25% to 30% loss of opportunity to the seine fleet for their actions. To conduct such a program, we need to maintain the current management plan's time and area so the fleet can move to other locations as fishermen figure out chum hotspots. Given a similar June management plan to 2022 we believe we can improve on the voluntary program and reduce chum harvest further in 2023.

Implementing a chum cap of 280,000 is draconian and would be a severe blow to the Aleut communities of the Alaska Peninsula. In 2022, a cap of 280,000 would not allow the voluntary program to function and would likely result in a 60% reduction in all harvest including sockeye. When the type of severe management plans proposed by Proposals 134, 136, 137, 139 and 140 are implemented like it was during 2000 – 2003, 37.2% fewer permits

were fished in Area M. This would be devasting to the economies of Aleutians East Borough and Aleut communities that depend upon this fishery. It makes no sense to devastate those communities when the best available science demonstrates that this proposal will not produce measurable improvements in any individual salmon run.

Similarly, reducing the June fishery to 100 hours under Proposal 137 would be devasting to the communities of the Alaska Peninsula, fishermen, processors, and support companies alike. Predicting the harvest is difficult but it would be reasonable to think that it would reduce the sockeye catch by 65% or so. Certainly, a 100-hour June fishery would push many boats from participating and make the processors consider whether they could make overhead costs.

In addition, we oppose Proposals 148 and 149 (amend 5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan , 09.366 Post-June Salmon Management Plan for the South Alaska Peninsula, & 09.360 Southeastern District Mainland Salmon Management Plan to provide closures or reductions to all fisheries based on preseason AYK forecasts).

These proposals appear identical except that Proposal 149 includes a request that ADF&G "implement a genetic testing program for the Area M commercial fisheries to identify stock of origin for effective management of AYK Chinook and Chum salmon." As discussed above, ADF&G did conduct a chum genetic study during the Area M salmon fisheries in 2022 and its published results contradict the central premise of Proposal 148 and 149: that reducing or closing the June and post-June Area M salmon fisheries will increase AYK chum runs. ADF&G has determined that breaking the CWAK chum reporting group into smaller reporting groups, i.e., down to river of origin, is not possible with current genetic sequencing techniques. (ADF&G, SP 23-07 at 3).[19/]

Confusingly, the proposals appear to seek reductions in Area M fisheries to benefit Yukon and Kuskokwim *Chinook* runs. The proposals seek closures or reductions in three Area M fisheries based on preseason Yukon and Kuskokwim forecasts (whether chum or chinook or both, they do not say), and would reduce fishing time by 50% if the lower bound is not expected to be met based on preseason Yukon and/or Kuskokwim forecasts. Additional measures include restricting harvest in high abundance areas.

These proposals are predicated on the presumption that Alaska Peninsula fisheries are the primary driver in chum and chinook declines on the Yukon and Kuskokwim River systems. For chum and the June fishery, this is not true for all the reasons discussed above in our opposition to Proposals 134, 136, 137, 139 and 140. WASSIP 2007-2009 and the 2022 Genetic Stock Composition study conducted by ADF&G contains the best available science as to the harvest rates and estimates for CWAK chum caught in Area M fisheries. In addition, the June fishery harvests exceedingly low amounts of Chinook salmon, and there is no evidence that they are AYK-bound. The 2003-2022 average June harvest is 6,044 Chinook. ADF&G, SP 23-07 at p. 36 (Table 1). [19/]

The same studies clearly show that July and August Area M harvests have virtually no CWAK stock groups- no fall Yukon chum, summer chum, coho, or chinook. ADF&G, SP 23-07 at pp. 18 and Table 22 (July chum harvest); p. 20 and Table 25 (August chum harvest). [19/]

This proposal to reduce fishing time by 50% across the entire season would be devastating to the Aleutian people who depend upon these commercial fisheries. It is a blunt measure that will not solve the AYK decline in chum salmon productivity. (WASSIP data from 2007 – 2009 and the new 2022 chum study).[19/, 20/]

It is interesting that the proposal mentions restricting fishing in high abundance areas. We conducted a voluntary program for the June 2022 fishery that restricted fishing in high abundance areas. All 64 Area M seiners participated in the program and stood down the first day of the fishery to conduct test fishing in order to figure out chum hotspots. As the season developed, fishermen self-managed by area where some stood down or moved to other areas with less chum present. In all, fishermen likely gave up 25% to 30% opportunity to lower their collective chum catch. What we learned from this program was better and faster communication among the fleet and processors would improve the program. For 2023 we will introduce a web portal and app for real time communication that will provide faster response times for chum avoidance.

Proposal 138 Oppose. 5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan. **–** During the June period amend regulation to require observers onboard commercial fishing vessels.

Observes on seine boats would accomplish little in the way of reducing CWAK chum harvest and certainly would not improve the accuracy of the harvest. Drift gillnet boats would have some difficulty accommodating another person. If there were an observer, this would not change the harvest rate on CWAK chum or reduce chum harvest. The reality is fishermen haul their loads on as quickly as possible to get the fish into their holds to begin the chilling process. The proposer mentions the trawl fishery observer program as an example to consider, but the trawl and net fisheries are very different. ADG&G does not believe there is an accountability issue and states they do not have concerns about accuracy or timeliness of the harvest, species composition, or weight data. The proposer cites "[t]he disparity in harvest" between the Area M and AYK fisheries as a reason for the proposal, alleging that it "divides users and creates animosity due to lack of trust." However, the animosity is entirely one-sided as Area M fishermen bear no ill will towards AYK subsistence users. It is unfortunate that subsistence users are being misled and misinformed into blaming Area M fisheries for AYK chum problems. Much animosity and distrust would be dispelled if subsistence users would simply review the current science rather than repeating misinformation. *See*, e.g., our responses to Proposals 134, 136, 137, 139 and 140 regarding WASSIP data and the 2022 chum genetic study.

Area M seiners are actively working to reduce chum harvest in the sockeye fishery. Area M seiners introduced a voluntary program in 2022 with a goal of reducing chum harvest while targeting sockeye. This voluntary program included moving off chum hotspots once they were known, standing down from fishing multiple times. It is estimated that executing this program in June resulted in a 25% to 30% loss of opportunity to the seine fleet. To conduct such a program, we need time and area so the fleet can move to other locations as fishermen determine chum hotspots. Given a similar June management plan to 2022 we believe we can improve on the voluntary program in 2023 and reduce chum harvest further. If there is someone from OTNC that would like to observe this kind of operation for a day or two during June, we would welcome the opportunity to demonstrate what we do.

Proposal 141 Oppose. 5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan. – Amend regulation to allow selective harvest of sockeye but require all other salmon bound for AYK to be released.

Unfortunately, this is a good idea but wholly impractical. A fishermen or a genetic scientist cannot tell a CWAK chum from an Asian chum on the deck of a boat without first killing it, taking a tissue sample and then analyzing the tissue sample on board with specialize lab equipment. The logical conclusion of this proposal if implemented would be to not harvest fish. Similarly, harvesting a chum in a mixed stock fishery or even subsistence fishery in the lower Yukon, the origin of that chum may be Canadian but can only be determined by genetic analysis of a tissue sample.

Proposal 142 Oppose. 5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan. **& 09.366 Post-June Salmon Management Plan for the South Alaska Peninsula**. – Amend regulation to separate set gillnet fishing times from seine and drift gillnet fishing dates and times.

We oppose this proposal due to moving harvest times from June into July goes against the spirit of the June management plan and the July management plan which were developed to manage different stocks and different management issues. Keeping the fleets aligned in time and area allows for "no fishing" windows so important to passing migrating salmon. The proposed fishing schedule would create several 8-hour 'no fishing' windows in July, whereas the current July schedule has four 56-hour "no fishing" windows.

Proposal 143 Oppose. 5 AAC 09.366 Post-June Salmon Management Plan for the South Alaska Peninsula. Amend the regulation regarding post-June so that in the immature test fishery, immature salmon would consist of gilled salmon and immatures not gilled but in the seine net and include set netting with the seine fleet for the closure period.

We oppose this proposal for two fundamental reasons: 1) the set net fishery does not need to close when the seine fishery closes because the catching power of purse seine nets compared to set nets is orders of magnitude greater,

and 2) the 30-year baseline data set from the test fishery is valuable as a historical perspective. The set net fishery may catch some immature salmon but they exhibit a small percentage of the catching power of 64 seiners. This is not a conservation concern that ADF&G has raised or believes is necessary.

The seiners have been shut down due to immature-threshold exceedances (5 AAC 09.366) in 11 of the last 33 years, with 2015 – 2017 being the most recent years for the closure. Conservation and protection of immature salmon in the Southeast district of the Shumagin Island section has been effective for three decades and there is no compelling reason to include the set net fleet as part of the closure.

Proposal 150 Oppose. 5 AAC 09.200. Description of districts and sections, 09.360. Southeastern District Mainland Salmon Management Plan & 09.365. South Unimak and Shumagin Islands June Salmon Management Plan – Amend districts and sections by including Volcano Bay Section of the Southwestern District into the South Central District. Sockeye caught in Volcano Bay section would then fall under provisions of (g) regarding 7.6% proportion of Chignik bound sockeye.

We oppose this proposal as its intent is to reduce harvest opportunities in Area M fisheries and convey the benefit to Area L fishermen. Currently there are sufficient regulations in place, including the 2022 Area M Seiners & Chignik agreement to protect Chignik Lake sockeye. There is a long history of regulation changes to protect Chignik sockeye, including recent ones cited by ADF&G:

> "During the February 2016 Alaska Peninsula, Aleutian Islands, and Chignik meeting, the board made changes to the South Unimak and Shumagin Islands June Salmon Management Plan (5AAC 09.365) and the Post-June Salmon Management Plan for the South Alaska Peninsula (5 AAC 09.366) by adopting regulations to limit the number of sockeye salmon harvested in the Western Alaska Salmon Stock Identification Program (WASSIP) described "Dolgoi Island Area" (statistical areas 283-15 through 283-26 and 284-36 through 284-42; Figure 150-1). From June 1 through July 25, when harvest reaches 191,000 sockeye salmon by fish ticket information, the portion of the West Pavlof Bay Section south of Black Point (statistical area 283- 26) and waters of Volcano Bay Section (statistical areas 284-37 through 284-39) close to commercial salmon fishing through July 25."

Further restrictions as per proposal 150 are unwarranted.

Thank you for this opportunity to comment.

Sincerely,

Kiley Thompson, President Area M Seiners Association

REFERENCES & LITERATURE CITED

1/ Aleutians East Borough Economic Memo January 26, 2023

2/ ADF&G Manuscript Series 16-10 Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Kodiak Management Area, 2014–2016

3/ Walsworth, T. E., D. E. Schindler, J. R. Griffiths, and C. E. Zimmerman. 2015. Diverse juvenile life-history behaviors contribute to the spawning stock of an anadromous fish population. Ecology of Freshwater Fish 24 (2): 204-213. DOI: 10.1111/eff.12135

4/ Walsworth, T. E., J. R. Baldock, C. E. Zimmerman, and D. E. Schindler. 2020. Interaction between watershed features and climate forcing affects habitat profitability for juvenile salmon. Ecosphere 11(10):e03266. 10.1002/ecs2.3266

5/ Griffiths, J. R., D. E. Schindler, and L.W. Seeb. 2013. How stock of origin affects performance of individuals across a meta-ecosystem: an example from sockeye salmon. PLoS ONE 8(3): e58584. doi:10.1371/journal.pone.0058584

6/ ADF&G, Kuskokwim River Salmon Fishery Announcement #8, 10-24-22 at Table 1 https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1442508330.pdf

7/ ADF&G Special Publication 23-97. Dann, T. Genetic Stock Composition of Chum Salmon Harvested in Commercial Salmon Fisheries of the South Alaska Peninsula, 2022

8/ Yukon River Panel Website, Established Under Pacific Salmon Treaty https://www.yukonriverpanel.com/about-us/yukon-river-panel/yukon-river-salmon/chum/

9/ ADF&G Special Publication 12-25, Harvest and Harvest Rates of Chum Salmon Stocks in Fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP), 2007-2009Table 158-160, pages 206-208. Munro A., et.al. http://www.adfg.alaska.gov/FedAidpdfs/sp12-25.pdf

10/ Yukon River 10/Pilot Station Escapement History https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareayukon.salmon_escapement

11/ Fishery Manuscript Series 17-05 Summary of Pacific Salmon Escapement Goals in Alaska with a Review of Escapements from 2008 to 2016 https://www.adfg.alaska.gov/fedaidpdfs/fms17-05.pdf

12/ Parker, R., 1962 Estimations of Ocean Mortality Rates for Pacific Salmon (Oncorhynchus), Journal of the Fisheries Research Board of Canada

13/ Karpenko, V.I., Ocean mortality of northeast Kamchatka pink salmon and influencing factors. N Pac Anadromous Fish Comm Bull. 1998;1:251–261

14/ WASSIP Alaska Salmon Stock Identification Program Document 11: Defining Reporting Groups https://www.adfg.alaska.gov/static/fishing/pdfs/research/wassip/documents/Tech%20Doc%2011%20Defining%20Reporting%20Groups%20V1.pdf

15/ Board of Fisheries Finding # 2004-229-FB at 2. https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2018-2019/akpen/rcs/rc048_Dale_Carlson_BOF_Finding_2004-229-FB.pdf

16/ Board of Fisheries Finding # 96-164-FB at 4. https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/findings/ff96164x.pdf

17/ Ruggerone, G.T., et al., Evidence for competition at sea between Norton Sound chum salmon and Asian hatchery chum salmon. Environ. Biol. Fish (2012) 94:149-163

18/ ADF&G Memo to Board of Fisheries re: Orutsararmiut Native Council Emergency Petitions, October 5, 2022

19/ Dann, T., et.al. Genetic Stock Composition of Chum Salmon Harvested in Commercial Salmon Fisheries of the South Alaska Peninsula, 2022. Special Publication No. 23-07 https://www.adfg.alaska.gov/FedAidPDFs/SP23-07.pdf

20/ ADF&G Special Publication 12-25, Harvest and Harvest Rates of Chum Salmon Stocks in Fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP), 2007-2009Table 158-160, pages 206-208. Munro A., et.al. http://www.adfg.alaska.gov/FedAidpdfs/sp12-25.pdf

Scientific Literature, Presentations, and Information regarding AYK Chum Stock Status

Ens, N. 2022, Distribution and Abundance of Salmon Prey Species in the Eastern Gulf of Alaska as Observed by the Winter 2022 IYS Pan-Pacific Expedition
Synopsis: Low prey availability during winter months has been posited as a limiting factor of salmon biomass in the Pacific Ocean. As such, appreciable efforts have been made to quantify patterns of spatiotemporal distribution and abundance of prey species consumed by salmon during their oceanic phase.

Gilk-Baumer, S., Genetic stock identification of sockeye, chum, and pink salmon from the 2022 Pan-Pacific winter expedition
Synopsis: Chum salmon samples from the Central region (N = 479) were composed 83% Asian stocks, while chum from the Eastern region (N = 127) were 25% Asian stocks

Howard, K., 2022. Western Alaska Chinook and Chum Salmon Marine Research
Synopsis: Future run size of Yukon Chinook is determined very early in their life – before their first winter at sea. Relationship of fry abundance in Yukon and adult return, the R^2 is 0.82, highly correlative. Juvenile chum had similar correlation as Chinook until 2016 when the marine environment got very warm and Yukon chum survival crashed. https://meetings.npfmc.org/CommentReview/DownloadFile?p=3a0643f9-e99e-451e-bc4a-96848c3cc26d.pdf&fileName=PPT%20D1a%20WAK%20Chinook%20and%20Chum%20Salmon%20Marine%20Research.pdf

International Year of the Salmon Research program website with dozens of most current ocean chum salmon symposia and papers. https://yearofthesalmon.org/

Larson, S. and Howard, K. 2019. Exploration of AYK Chinook Salmon Egg Thiamine Levels as a Potential Mechanism Contributing to Recent Low Productivity Patterns, 2014 and 2015
Synopsis: In 2015, 58% of the eggs had thiamine concentrations associated with secondary effects of thiamine deficiency that can lead to mortality

Miller, T. 2022, Nutritional Ecology of Juvenile North Pacific Salmon During Winter Existence: Results from the 2022 International Year of the Salmon Surveys
Synopsis: Using proximate composition (percent lipid and protein) and stable isotope analyses, we assessed the nutritional condition and isotopic (trophic) life histories of Pacific salmon from the 2022 International Year of the Salmon

(IYS) winter month surveys across the North Pacific, a period of reduced prey availability and potentially higher resource competition

Murphy, J. 2022 Coastal Surveys in Alaska and Their Application to Salmon Run-Size and Harvest Forecasts
Synopsis: The first critical period occurs during the estuarine or initial marine period of salmon. Predation-based mortality can often be the key factor during this critical period of salmon. The second critical period is believed to be primarily dependent on the ability of salmon to reach a critical size or nutritional state required to survive marine winters (Beamish and Mahnken 2001)

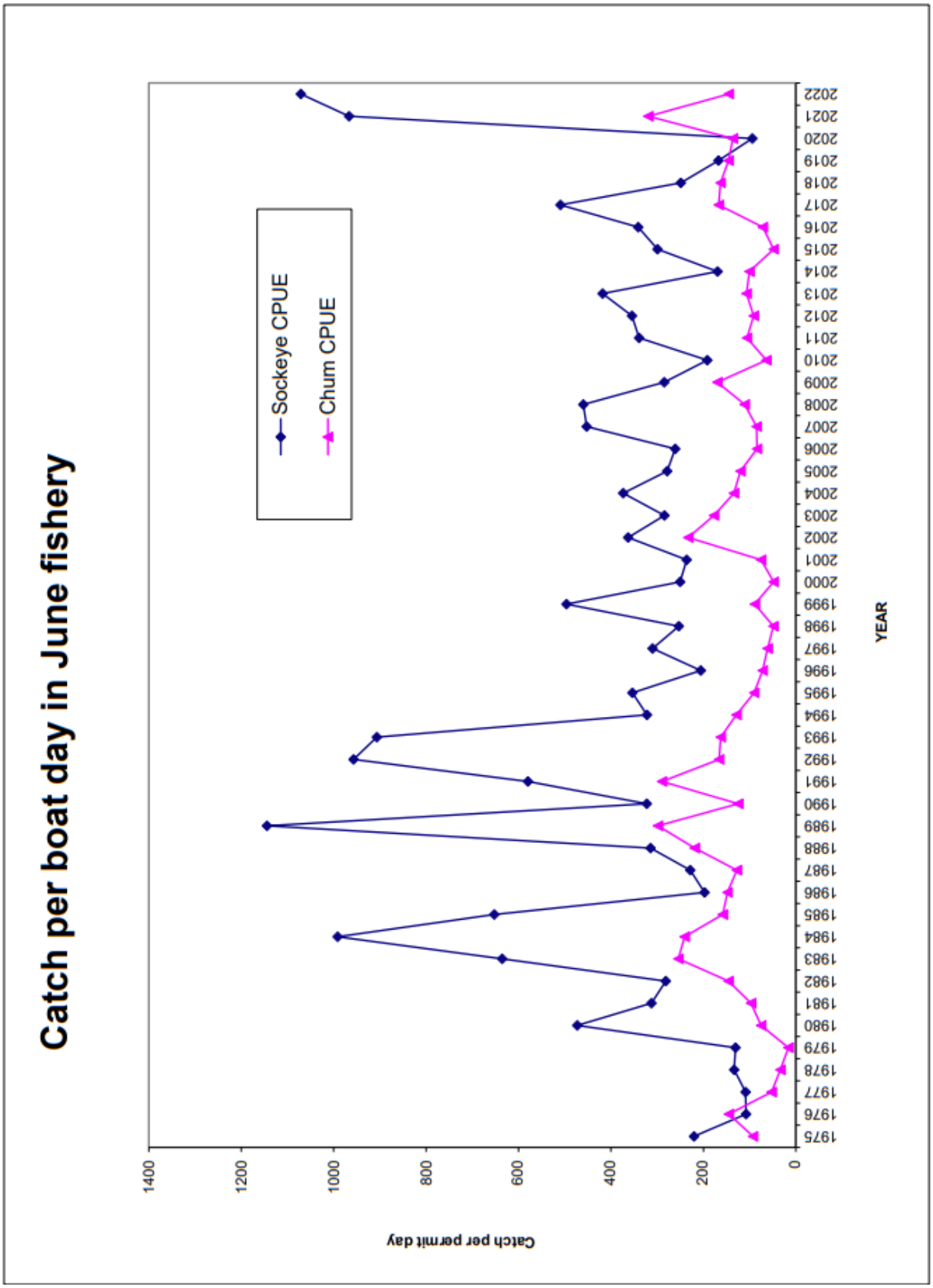
Ruggerone, G. Bottom-up and Top-Down Processes Drive the survival and Abundance of Pacific Salmon.
Synopsis: exceptional pink salmon abundance in 2018 & 2019 contributed to sharp decline in other salmon species productivity and harvest in 2020 and beyond. https://npafc.org/wp-content/uploads/1-5_Ruggerone_trim-c8e65a4348451a3edd0b25c9822214e1.mp4

Urawa, S. & Sato, S. Stock Identification of Chum Salmon Overwintering in Gulf of Alaska by Using a New SNP Baseline.
Synopsis: Study year 2019 and observation of juvenile and sub-adult chum salmon in North Pacific, part of the International Year of the Salmon research. Ocean age -1 chum had lower lipid content than older chum. Depletion of energy reserves observed. Frequent occurrence of skinny chum. CWAK stock poorly represented, especially ocean age-1 almost nonexistent.

https://npafc.org/wp-content/uploads/Day-1-Keynote-Presentation-5-Shigehiko-Urawa-Shunpei-Sato-Terry-b7b0b5fed162183a8dd511b59cd452f2.mp

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support



Catch per boat day, all permits fished by year. Sockeye catch per boat varies widely, whereas chum catch per boat has far less variation. 2021 was a recent anomaly, although similar to1989 and 1991.

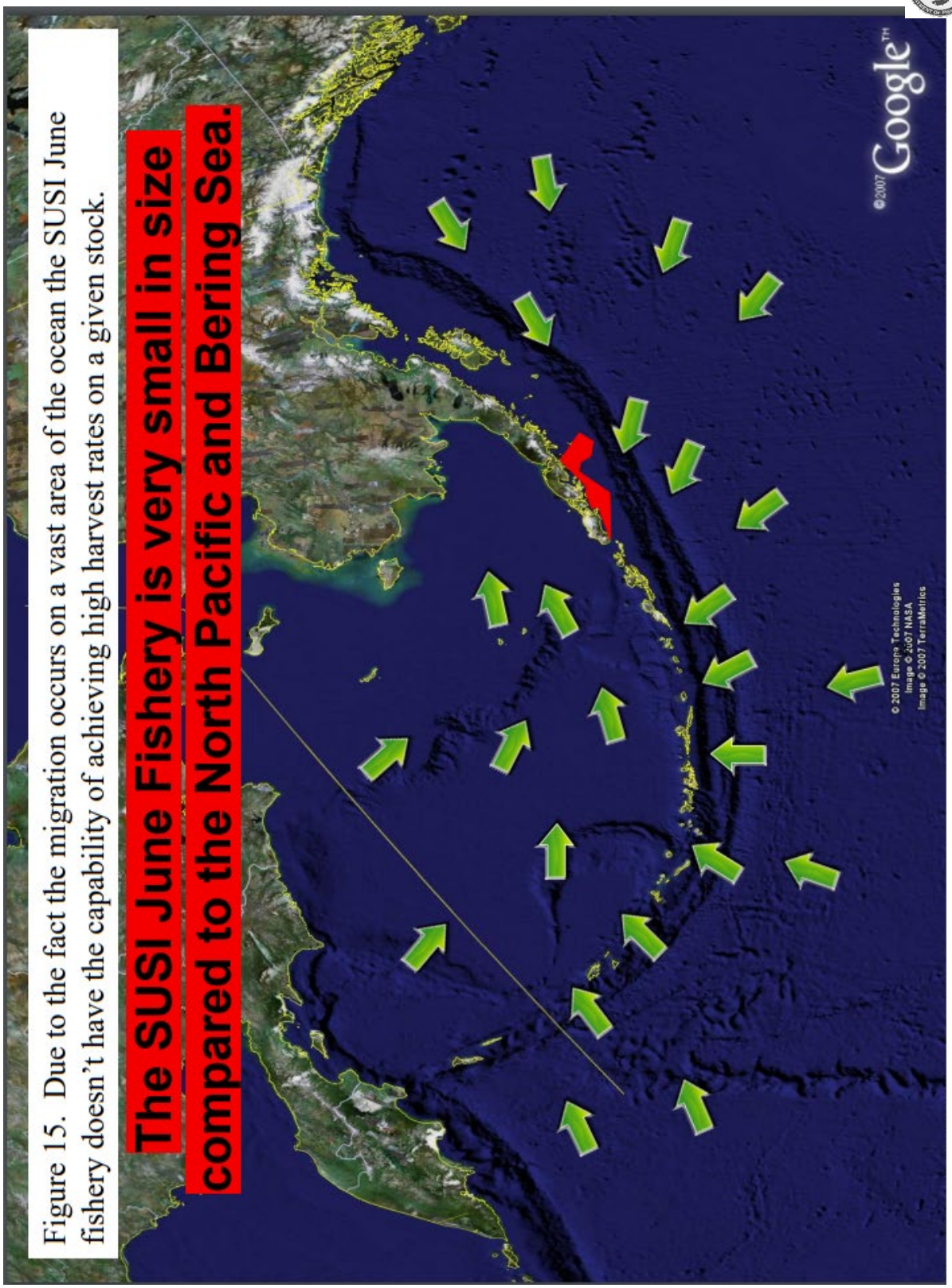


Figure 15. Due to the fact the migration occurs on a vast area of the ocean the SUSI June fishery doesn't have the capability of achieving high harvest rates on a given stock.

Area M is a small area compared to the board area where chum and sockeye migrate back to their natal streams. This helps explain why the harvest rate on CWAK stocks consistently remains in the low single digits.

PC11

Submitted by: Ilane Ashby

Community of Residence: Chignik Bay, Ak

Comment: 2/5/2023

Dear Chair Marit Carlson Van-Dort and members of the board,

My father fished Chignik as well as my husband. Both my sons and granddaughter fish

Chignik now. I support these proposals 135, 140, and 150 and here's my reasons why,

these would aid the return of Chignik salmon and maintain a sustainable fishery.

In hopes to return management to better quality for Chignik and communities.

Subsistance is not running like it used to in Chignik , we don't get enough fish to harvest.

This is why fish was flown into Chignik last year from Bristol Bay to help the community.

On a side note, this is wonderful and everyone was grateful to receive fish. But, why does Chignik have to rely on other sources for salmon? When salmon has been

flourishing for 100 plus years!!

My two sons have to travel to Bristol Bay to tender fish, not Purse Seine, for a season.

This is what making a living is just to survive in Chignik.

They are not able to bring home fish like they could when life was traditional fishing in Chignik. They're not able to bring fish home while tendering like when they could when fishing Chignik.

I oppose these proposals 105 and 132 and here's my reasons why, these would be destructive to Chignik fish and communities.

To have the community achieve we need fish back to support the economy and well being of Chignik. It would benefit the community and everyone knows this.

To drop escapement and merge the runs would be completely senseless. Chignik has always had an early and late run and it should remain that way. There's no need to make drastic changes like this.

Last years escapement was up because slight improvements were made. Thanks to various restrictions to Dolgoi and Shumagins. It's my understanding they were for only last year but now we need long term restrictions on interception for an outcome that's sustainable every year. That's why I support 135,140, and 150. Anything that helps protect Chignik fish passing through area M I am in support of.

Here's the clincher, interception and lower escapements will and has tortured Chignik and the Salmon. When I was a kid I remember the escapement was much higher.

Please Restore Our Salmon.

Thank you for listening.

Ilane Ashby

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 105: Oppose
Proposal 132: Oppose
Proposal 135: Support
Proposal 140: Support
Proposal 150: Support

PC12

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial, subsistence and personal use fisheries. I was born and raised in King Cove. I have been a fishermen since I was 11 years old. Today I am a small boat owner and if there are any more cuts to the salmon fishery, I may not be able to maintain my expenses to operate my vessel; the cost to operate is so high. My family depends on the salmon fishery. It is a part of who I am as it is to many of the fishing families in King Cove. We give up more and more each year and there needs to be a limit. We don't believe in pitting regions against each other but putting the people in Area M in a position to take any more is wrong. We ask that the board makes decisions based on the science. It is clear we are all dealing with global warming and in some regions more so than others, but fisheries in our region continue to be limited. We can't survive any more cuts.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Larry Bear Jr.
larrybearjr@gmail.com
(907) 497-2431

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC13

Belkofski Corporation
P.O. Box 46
King Cove, Alaska 99612
Phone: 907-497-2513
belkofskicorporation@hotmail.com

January 30, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska. As President, I wish to extend Belkofski Corporation's support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan by taking the following positions on the below-listed proposals:

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Belkofski Corporation, based in King Cove, Alaska, was organized in 1972 after passage of the Alaska Native Claims Settlement Act (ANCSA). It is a for-profit corporation organized under State law. Belkofski Corporation is responsible for administering the land and money distributed to its shareholders under ANCSA.

We have shareholders that participate in all facets of the fishery in the South Alaska Peninsula region (often referred to as "Area M"). Our shareholders rely on the Area M fishery to support their families, put food on their tables, and maintain their connection to these waters that our people have lived among since time immemorial.

Alaskans, including our shareholders, have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other

fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

All of us in the entire Alaska Peninsula community—King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon—are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities—including ours—die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Kaye Lynn Mack
President
Belkofski Corporation

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC14

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial fisheries. Salmon fishing in the South Alaska Peninsula region is important because it is a way of living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Herman Bendixen
kccadmin@arctic.net
(907) 497-2350

Bering Sea Fishermen's Association
821 N Street, Suite 103
Anchorage, Alaska 99501
(907) 279-6519 or (888) 927-2732
FAX (907) 258-6688
www.bsfaak.org

PC15

February 6, 2023

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o Alaska Department of Fish and Game
1255 W. 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526

RE: 2023 Alaska Peninsula Board of Fisheries Proposal Comments

Dear Chairperson Carlson-Van Dort and Members of the Board of Fisheries:

For 43 years Bering Sea Fishermen's Association (BSFA) has served small boat commercial fishermen living in the Arctic, Yukon, Kuskokwim and Bristol Bay regions of Alaska. BSFA is a nonprofit corporation supporting 128 vibrant fishing communities by fostering greater social, financial, and political capacity to access, sustainably develop, and protect fisheries in the Arctic, Yukon, Kuskokwim (AYK), and Bristol Bay regions of Alaska.

To mitigate current conservation concerns for AYK salmon stocks, BSFA supports Proposal 140 as written and calls for in-season, real-time genetic sampling and analyses of Area M chum harvests – and urges the Board of Fisheries (the Board) to do the same. It is indisputable that significant percentages of AYK-bound chum salmon are present in and harvested by Area M fishermen during the June commercial fisheries. BSFA urges the Board to support Proposal 140 to curtail interception of AYK-bound chum by reducing fishing time for all gear types in Area M subdistricts that are known to intercept percentages of chum that would otherwise escape to rivers throughout the AYK region. **Relative to other proposals before the Board, Proposal 140 is a compromise which proposes an elegant, administratively reasonable solution to this inequity by returning management of those interception fisheries to a known regulatory structure that, when previously implemented between 2001 and 2003, provided a stronger safeguard against the unsustainable interception of AYK-bound chum and other non-local stocks that have occurred in Area M commercial fisheries in recent years.**

The magnitude of the chum salmon run failures throughout the AYK region – in particular, on the Yukon and Kuskokwim rivers – illustrate why passing Proposal 140 will positively impact AYK commercial and subsistence interests and align the Board with its own policies and regulations. The extent of fishery failures throughout the AYK region are resulting in unprecedented cultural, social, economic, and ecological disruptions and are threatening food security for tens of thousands of rural residents that rely on salmon.

For 2021 and 2022 Yukon River summer and fall chum salmon run failures resulted in complete closures to all directed fishing within the Yukon Area during the summer and fall seasons and failed

to meet escapement goals critical for the viability of these stocks. The Yukon drainage is subject to a Biological Escapement Goal of 500,000–1.2M summer chum; in 2021, the drainage-wide escapement was approximately 153,120 summer chum salmon. In 2021, the Yukon Area had no summer or fall subsistence or commercial chum harvest.

In 2022, Alaska Department of Fish and Game (ADFG) forecasted a far-below-average run of 162,000–542,000 Yukon summer chum. The reality was worse than the forecast. In 2022, similar to 2021 despite no fishing opportunities for salmon, no Yukon River salmon escapement goals were met. Worse, in 2022 all salmon escapements will be less than half of the all-time worst returns. Preliminary data provided by ADFG at the recent AYK Board meeting demonstrate that the 2022 Yukon summer chum run was approximately 484,618 fish and failed to meet the low-end of the escapement range. Minimal subsistence harvests fell well below the Amounts Necessary for Subsistence (ANS) range of 83,500 to 142,192 fish and there was no commercial harvest of Yukon summer chum. The summer chum escapement estimates for the Salcha and Chena rivers may already be too small to maintain viable populations in the Tanana Drainage.

The Yukon River fall chum run is faring no better leaving residents with no other chum to fall back on. The fall chum run is subject to a Sustainable Escapement Goal (SEG) of 300,000-600,000 fish. Between 2015 and 2019, the fall chum run averaged 1.3 million fish. Between 2020 and 2022, the size of the fall chum run averaged 178,000 fish. In 2021 and 2022, there were no fall chum commercial fisheries. The ANS for fall chum is 89,200 to 167,900 fish; on average, between 2020 and 2022, ADFG estimated an average subsistence harvest of less than 3,000 fish, well under the low-end of the ANS range.

Chinook and fall chum salmon escapement goals via Canadian treaty obligations have not been met since 2019. Returns have continued to decline since and are predicted to continue, despite U.S. harvest restrictions on commercial and subsistence. The lower end of the treaty goal has only been met 10 times in the last 20 years. Yukon Territories have lived without sufficient salmon for subsistence for far too long. Our actions on this side of the border have had significant repercussions for the Canadians.

Chum runs in the Kuskokwim River are faring no better. The only chum salmon escapement goal in the Kuskokwim River drainage is at the Kogrukluk River weir and is a SEG of 15,000–49,000 fish. This low-end of this single escapement goal was not met in 2021 or 2022. In 2021, Kuskokwim drainage weirs documented the lowest chum escapement on record. Chum salmon ANS for the Kuskokwim River is 41,200– 116,400 fish; ANS has not been achieved since 2018. Specifically: subsistence harvest of chum in 2019 was 34,568, 26,920 in 2020, and 9,621 in 2021.

The northern districts of AYK began to see declining chum salmon returns in the late 1980s. By the late 1980s and 1990s, runs were at their lowest points since tracking began around the time of statehood. The runs continue to suffer from declined status so much so that the ANS for salmon has been attained only twice since the year 2000. In the past 20 years, fishing time, fishing area, and gear depth in Area M have all increased significantly, while in the same time period the numbers of chum and Chinook salmon returning to AYK did just the opposite. Western Alaskan's are participating in conservation of these salmon stocks and it is time for other chum salmon harvesters to step up and participate in the return of chum salmon to their natal streams.

2023 season chum run and harvest estimates are not available yet, but ADFG anticipates restrictions or closures for summer and fall chum salmon subsistence and commercial fisheries. Chum forecasts are not produced on the Kuskokwim, but fishery managers are similarly preparing for yet another year of poor chum returns, unattained escapement goals, and foregone commercial and subsistence harvests. But that information is not necessary to grasp the severity of the circumstances: that the sustainability of chum stocks depends upon achieving, at the very least, the low-end of the escapement goals for AYK summer and fall chum stocks this year, and the sustainability of AYK communities' predicates on a surplus of salmon returns to support their exceptional and essential way of life.

In stark contrast recent to chum failures on the Yukon and Kuskokwim, in June 2021 alone, the South Unimak and Shumagin Islands June commercial fishery harvested 1,168,601 chum salmon, the highest chum salmon harvest in the history of this fishery. In 2022, the harvest in this fishery reached 544,097 chums. Recent genetic samples analyzed by the ADFG suggest that contemporary South Unimak and Shumagin Islands June commercial harvests comprise, on average, 18% Coastal Western Alaska chum salmon stocks – down from a 57% average from 2007 to 2009. The reduced proportion of Coastal Western Alaska chum caught in this fishery signals a collapse of these chum salmon stocks rather than a change in Area M fishing behavior. Ultimately, the genetic studies are incomplete data and misses the point that every fish counts when AYK runs are at historic lows. Regardless of the cause of this stock proportion decline, a 2022 commercial intercept of nearly 100,000 chums headed to the AYK regions is significant next to the season's record-low returns and the salmon sustainability crises afflicting these regions.

The ignorance and dismissal of the significant harvest of AYK-bound chum highlights the disconnect between management of the South Unimak, Shumagin Islands, and entire Area M fisheries by the Board and in-season management of AYK rivers by ADFG. In every other fishery in Alaska – except Area M – the Board's and ADFG's policy and practice is to close commercial fishing of a stock when escapement and subsistence needs will be unmet. Despite more than a century of Western scientific research documenting adult AYK chums' passage through Area M toward their spawning grounds; despite multi-year salmon crises on the Yukon and Kuskokwim that threaten regional food security and ecological sustainability; and despite the State statutes, regulations, and policies designed to guide the Board through such crises, managers still refuse to acknowledge that they are allowing the demise of AYK salmon stocks by not curtailing the Area M harvest of these stocks.

Managing Area M on a 3-year Board cycle must change to an in-season escapement plan in order to level the playing field for all involved. Managers must be given the ability to take action quickly and inseason in order to prosecute this fishery on equal footing as the rest of the state.

The Alaska Constitution and Alaska Statutes and regulations require the Board and ADFG to sustainably manage discrete salmon stocks to ensure future returns and to prioritize subsistence uses of Alaska's fishery resources over nonsubsistence uses. Alaska Statute 16.05.258 requires nonsubsistence uses to be eliminated when harvestable surpluses of AYK chum salmon stocks are insufficient to provide for all subsistence uses. Despite the subsistence priority statute, commercial harvests and sales of Yukon River summer chum salmon, for example, has been allowed to continue unabated by Area M fishermen despite complete closures of all in-river summer chum salmon harvests in the Yukon River for subsistence, commercial, sport and recreational, and personal uses.

Delay in addressing the issue violates the "precautionary principles of sustainability" as noted several times throughout the state's fishery regulations.

Constitutional and State Statutes also require the Board and ADFG to manage mixed stock fisheries consistent with sustained yield, as written in 5 Alaska Administrative Code 39.220 and Alaska Constitution Article VIII, Section 4. Commercial mixed stock fisheries in Area M that intercept AYK-bound chum have a direct effect upon achieving escapement goals and providing reasonable opportunities for subsistence harvests and uses in the AYK region. Additionally, despite the obvious conservation concern for these chum stocks, present state management of these mixed stock interception fisheries places no burden of conservation upon those Area M commercial fishermen but passes it onto the shoulders of AYK subsistence users – a user group who cannot economically, nutritionally, or culturally afford to bear that burden. This needs to change, and **the most logical, equitable and least burdensome way to implement that change is by adopting Proposal 140 as written, and a scientifically sound way to track this conservation is through in-season genetic sampling and analysis throughout the Area M fishery.**

BSFA acknowledges the likely existence of environmental and anthropogenic factors other than Area M's interception of AYK-bound chum salmon that may also be contributing to the AYK chum crashes. Many of these are beyond this Board's control, and none of these absolve the Board of its responsibility to manage fisheries sustainably and equitably by taking appropriate, legally mandated action to prevent further damage to the health and sustainability of salmon stocks. The interception of AYK-bound chum stocks in all districts of the Area M June salmon fisheries is a documented factor affecting the ability of AYK chum stocks to fully escape to their natal rivers. It is imperative that the Board reduce the interception of AYK and Bristol Bay chum salmon stocks in Area M fisheries to prioritize achieving AYK chum salmon escapement goals and prioritize customary and traditional subsistence uses. This is not about allocation but the very survival of a resource and the people who depend on it. **Without Board action, the viability of AYK chum stocks hangs in the balance.**

References to other proposals BSFA supports or opposes:

We provide **support** the following proposals: 133, 134, 135, 136, 137, 138, 139, 141, 143, 148, 149 and 150. The primary goal in support of these proposals is per the Policy for the management of sustainable fisheries, the Policy for the management of mixed stock salmon fisheries, the Policy for statewide salmon escapement goals, and the Subsistence use and allocation of fish and game statute is to reduce Area M salmon interception but prefer adoption of Proposal 140 which is a compromise proposal relative to others currently before the BOF.

BSFA also **supports** proposals 106, 109, 111, and 118.

We **oppose** all proposals (107, 108, 112-117, 121-125, 127, 130-132, 144-147, 151, and 152) which would increase commercial fishing time, areas, harvests or more efficient gear types in Area M, or are otherwise designed to negatively impact Chinook or chum salmon.

BSFA also **opposes** proposal 105.

PC16

January 28, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries. I'm a homeowner in the Sand Point community and I solely depend on the Area M commercial fisheries to pay my bills. Without the commercial salmon fishery there would be no reason for me to maintain my home and continue to live in Sand Point. Everything is expensive in rural Alaska; without salmon fishing in the South Alaska Peninsula region, I couldn't maintain my livelihood in Sand Point on the winter and fall seasons alone.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Jordon Birkholz
jordonbirkholz@gmail.com
(760) 914-3327

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC17

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in subsistence and sport fisheries. Salmon fishing in the South Alaska Peninsula region provides income to our community; for most, it's their way of life. Subsistence fishing fills our freezer.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Carisa Brandell
carisamae95@gmail.com
(907) 497-7124

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC18

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries, as well as in processing work and through local business supporting fisheries. Salmon fishing in the South Alaska Peninsula region provides the only income for families and keeps the freezers full. Our community needs fishing to keep our community going.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Seward Brandell
sewardbrandell420@hotmail.com
(907) 497-7040

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC19

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska and I participate in subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is important because it is a way of living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Shirley Brandell
kccadmin@arctic.net
(907) 497-2295

PC20

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial, subsistence, and sport fisheries. Salmon fishing in the South Alaska Peninsula region is very important as a source of income and a way of living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Penin management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Waylon Brandell
kccadmin@arctic.net
(907) 497-2295

PC21

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in subsistence and sport fisheries. Salmon fishing in the South Alaska Peninsula region is very important as a way of living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Les Brandell
kccadmin@arctic.net
(907) 421-7115

PC22

Bristol Bay Fishermen's Association
P.O. Box 60131
Seattle, WA 98160
Phone/Fax (206) 542-3930

January 31, 2023

ATTN: BOF COMMENTS
Alaska Department of Fish and Game
Boards Support Section
PO Box 25526
Juneau, Alaska 99802-5526

The **Bristol Bay Fishermen's Association (BBFA)** submits the following positions on proposals for the Alaska Peninsula/Aleutian Islands/Chignik Board of Fisheries Meeting.

BBFA represents permitholders who fish for salmon in Bristol Bay. Our mission is to protect the renewable salmon resource and promote economic sustainability for commercial salmon permit holders in Bristol Bay.

Thank you for the opportunity to submit our positions on proposals. We look forward to attending the meeting in Anchorage.

Sincerely,

Luke Peterson
President

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 120: Support
Proposal 121: Oppose
Proposal 122: Oppose
Proposal 123: Oppose
Proposal 124: Oppose
Proposal 125: Oppose
Proposal 126: Support
Proposal 129: Oppose
Proposal 134: Support
Proposal 135: Support
Proposal 136: Support
Proposal 137: Support
Proposal 139: Support
Proposal 140: Support
Proposal 141: Oppose
Proposal 148: Support
Proposal 149: Support

BBFA's Positions on Alaska Peninsula/Aleutian Islands/Chignik Board of Fisheries Proposals

Proposal Number	BBFA Position
Proposal 120	Support
Proposal 121	Oppose
Proposal 122	Oppose
Proposal 123	Oppose
Proposal 124	Oppose
Proposal 125	Oppose
Proposal 126	Support
Proposal 127	No Action
Proposal 128	No Action
Proposal 129	Oppose
Proposal 130	No Action
Proposal 131	No Action
Proposal 132	No Action
Proposal 133	No Action
Proposal 134	Support
Proposal 135	Support
Proposal 136	Support
Proposal 137	Support
Proposal 138	No Action
Proposal 139	Support
Proposal 140	Support
Proposal 141	Oppose
Proposal 142	No Action
Proposal 143	No Action
Proposal 144	No Action
Proposal 145	No Action
Proposal 146	No Action
Proposal 147	No Action
Proposal 148	Support
Proposal 149	Support
Proposal 150	No Action
Proposal 151	No Action
Proposal 152	No Action

PC23

BRISTOL BAY NATIVE ASSOCIATION
P.O. BOX 310
DILLINGHAM, ALASKA 99576
PHONE (907) 842-5257

Aleknagik
Chignik Bay
Chignik Lagoon
Chignik Lake
Clarks Point
Curyung
Egegik
Ekuk
Ekwok
Igiugig
Iliamna
Ivanof Bay
Kanatak
King Salmon
Kokhanok
Koliganek
Levelock
Manokotak
Naknek
New Stuyahok
Newhalen
Nondalton
Pedro Bay
Perryville
Pilot Point
Port Heiden
Portage Creek
South Naknek
Togiak
Twin Hills
Ugashik

February 6, 2023

Chair Märit Carlson-Van Dort
Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

RE: Support to defer action at the 2023 Alaska Peninsula / Aleutian Island / Chignik Finfish meeting on Proposals 105 and 132

Dear Chair Carlson-Van Dort:

Bristol Bay Native Association (BBNA) is a non-profit association serving 31 federally recognized tribes in the Bristol Bay region in Southwest Alaska. Governed by a board of directors composed of representatives from each of the tribes in the region, BBNA's mission is to function as a service agency dedicated to the betterment of the Native people of the Bristol Bay region.

Since 2018, the villages of Chignik Bay, Chignik Lake, Chignik Lagoon, Ivanoff Bay and Perryville have had fisheries disasters as salmon have failed to meet their escapement goals. Bristol Bay Native Association has been working with the villages to rectify and respond to these disasters.

We have great concerns about unmet escapement goals and particularly about proposals 105 and 132 for combining escapement goals into one. A drastic change like this should be an open, transparent process. However, it has been quite the contrary.

During the March 2022 Board of Fisheries meeting the board designated the Chignik Early-Run Sockeye Salmon as a Stock of Management Concern. The Chignik Sockeye Management Action Plan has still not been provided to the public for review in a timely fashion regarding this important issue, it has been 11 months since the stock of management concern designation.

The local residents and ADF&G Advisory Committees must be given the opportunity to review and comment before any decisions are made. The ADF&G Advisory Committee Manual, Fourth Edition, November 2022, requires that regulations adopted by the Board of Fisheries (BOF) and Board of Game (BOG)

follow the process requirements of the Administrative Procedures Act (APA) within Alaska Statute Chapter 44.62. The boards even go beyond the minimum requirements of the APA to provide additional public involvement as described under the Joint Board regulations 5 AAC 96.610.

The following must be discussed at full public hearings. The department's proposals would merge two separate and genetically distinct sockeye salmon stocks in the Chignik River. These stocks have been managed under two different escapement goals for 55 years, and now would be put into a single watershed-scale biological escapement goal (BEG).

Proposals 105 and 132 are not supported by established best practices for informed fishery management or the best available science. These changes will interfere with, if not entirely prevent, assessment of the health of the early run, and risks putting more pressure on the Black lake run. No evidence is provided how combining the two goals will be used to rebuild and restore the early run sockeye, in fact it's contrary to the process. It is scientifically irresponsible to not explore the biological consequences of such actions.

In accordance with the Sustainable Salmon Policy, a precautionary approach, involving the application of prudent foresight that takes into account the uncertainties in salmon fisheries and habitat management, the biological, social, cultural, and economic risks, and the need to take action with incomplete knowledge.

Despite habitat changes in the Chignik watershed, Chignik continues to produce two ecologically and evolutionarily distinct sockeye salmon runs that overlap in time and area. These runs have been developed over most of the last century and the recent proposed changes are a step back from the rich body of knowledge the department and others have accumulated.

The accepted best practice for informed fishery management is to set fishery objectives at appropriate spatial and biological scales. When there is evidence of distinct stock-structure within a watershed, as there is in Chignik, the best science applies direct management for that structure with distinct goals. The proposed change to a single BEG of 450,000 to 800,000 ignores this precedent and is contrary to fishery management best practices.

The proposals assume that mere overlap in juvenile rearing habitat creates a single bottleneck in the ecosystem to justify a single BEG. This reasoning is based on an assumption, not on empirical evidence that the hypothesis is correct. There is no doubt that juvenile sockeye from the early and late runs overlap in their habitat use during certain parts of their life cycles. However, there is no clear evidence that density-dependent processes in these two stocks play out at this single life stage.

The proposed change raises multiple questions that managers must answer before implementing the proposed change:

1. What is the ultimate scientific justification for this major change?
2. How will this change protect or potentially fail to protect stock diversity in the watershed?
3. What are the consequences of these changes for productivity compared to maintaining the status quo?
4. Are there other systems comparable to Chignik with obvious stock structure, excellent data quality, and the ability to direct harvest to specific stocks that have only a single management goal?

The department has not provided adequate opportunity for meaningful discussion and dialogue about the potential biological and economic consequences of transitioning to a single BEG. The proposed change must be delayed until: 1) ADF&G's has a scientific justification for the proposed change; 2) it is approved by independent outside review; and 3) the public has had an opportunity to provide comments regarding the potential profound changes.

BBNA respectfully urges you to defer action at the Alaska Peninsula / Aleutian Island / Chignik Finfish meeting on Proposals 105 and 132.

Thank you for your service and consideration.

Sincerely,

Garvin Federenko
President & CEO

PC24

February 4, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries, as well as in local business supporting fisheries. Salmon fishing in the South Alaska Peninsula region is very important. I was a commercial fisherman for over 25 years before I moved to a different job. I now am a landlord and all of my tenants rely on salmon fishing. They are already having a hard time paying rent. Any further restrictions would be devastating for our community and wouldn't help anyone else. I flew out last year to testify which I felt was necessary. The meeting was out of cycle and cost our area a half a million dollars and nothing was accomplished. Now it is all deja vu all over again. The Board is costing the people in our area a lot of money just trying to sustain our livelihood and it's not right.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

James Brown
mrfabulousjamesbrown@hotmail.com
(907) 386-6050

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC25

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in subsistence fisheries. I am the landlord/owner of apartments and the majority of our tenants are involved in commercial fishing. I am also a retired postal worker and I participated in commercial fishing from 1964 to 2000 salmon, halibut, cod and crab). Salmon fishing in the South Alaska Peninsula region is very important. Without an income our tenants won't be able to pay their rents. I have children and relatives relying on the commercial fisheries. My parents and our family salmon fished all over the state at the time there wasn't any limited entry or separate districts. All fishermen were treated as equals in the state back then. Now you have Alaskans up against each other fighting for fishing rights. What happened to our historical fishing rights?

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Shirley Brown
sabrown661@yahoo.com
(907) 386-6054

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC26

Submitted by: David Byrd

Community of Residence: King Salmon

Comment: I oppose proposals 122,123,124

My reasoning for opposing these proposals is that the King Salmon populations on the Cinder River are on the decline. Also there has not been an accurate count of escapement numbers of Sockeye Salmon. The counts that have been done are one to two aerial surveys per year.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 122: Oppose **Proposal 123:** Oppose **Proposal 124:** Oppose

PC27

Submitted by: Daniel Castle

Community of Residence: Ketchikan

Comment: I oppose Proposal 140

The authors of this proposal want to turn back the clock to an archaic system that was discarded due to its inability to produce results. As written, the new management scheme would be very destructive to a vibrant distant water fishery in Area M. It would also be very cumbersome and complex for AMBs to implement.

There is one interesting aspect of Proposal 140 and that is the use of ratios of Reds and Chums to trigger management decisions. Ratios and high Chum counts were what fishermen, processors and biologists were looking at every day to minimize the incidental chum harvest during the 2022 June Sockeye fishery. Indeed, during the 2022 June fishery, there was an unprecedented cooperation amongst all parties to control incidental chum catch. Daily tallies were analyzed and adjustments were made. In addition, fishermen were observing ratios hour by hour and discontinuing fishing in certain areas and during certain portions of the fishing day. All seiners voluntarily agreed to stand down and forfeit our fishing opportunities when chums were abundant.

The seine fleet has proven that it can self-regulate. We can do the type of thing Proposal 140 is trying to put into regulation - only we can do it better. With real-time information and a small governing board, we can severely reduce chum harvest. Especially when Reds are not abundant.

The scheme proposed is bulky and rigid. Our fleet needs maximum flexibility to achieve the results obtained in the summer of 2022

Prop 140 would need to be heavily amended, so as to be unrecognizable, before it could be supported by the seine fleet.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose	**Proposal 119:** Oppose	**Proposal 135:** Oppose	**Proposal 143:** Oppose
Proposal 107: Support	**Proposal 120:** Oppose	**Proposal 136:** Oppose	**Proposal 144:** Support
Proposal 108: Support	**Proposal 126:** Oppose	**Proposal 137:** Oppose	**Proposal 145:** Support
Proposal 109: Oppose	**Proposal 128:** Oppose	**Proposal 138:** Oppose	**Proposal 146:** Support
Proposal 110: Support	**Proposal 130:** Support	**Proposal 139:** Oppose	**Proposal 148:** Oppose
Proposal 112: Support	**Proposal 131:** Support	**Proposal 140:** Oppose	**Proposal 149:** Oppose
Proposal 115: Support	**Proposal 133:** Oppose	**Proposal 141:** Oppose	**Proposal 150:** Oppose
Proposal 116: Support	**Proposal 134:** Oppose	**Proposal 142:** Oppose	**Proposal 152:** Support

PC28

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Ketchikan, Alaska and I participate in commercial fisheries. I am part of a commercial fishing family whose main income is from the South AK Peninsula fisheries. Because of our involvement in the area we also contribute to the communities of Sand Point, King Cove, and False Pass. We purchase provisions there, visit local businesses for supplies and repairs as well as eating at restaurants. The raw fish taxes from the deliveries we make help support the local economies as well. Salmon fishing in the South Alaska Peninsula region is very important; these fisheries are our main source of income and support five other families from the crew shares we give.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Jennifer Castle
castlefisheriesjen@gmail.com
(907) 617-5600

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
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Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC29

CHIGNIK INTERTRIBAL COALITION
427 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565

February 6, 2023

CIC supports 109:

Historically, the entire sockeye fishery in the CMA was managed with built in 48 hour closures, even while escapements were being met. This rather successful management philosophy was geared more towards pulse-escapements and pulse-harvests. We believe this promoted genetic diversity within the multitude of tributaries that populate the Chignik watershed for all species. By allowing closures fish were allowed to transit through our Central and Lagoon Districts uninterrupted.

Over time the Department moved to the current EO strategy rather than a fixed schedule, although the five day a week practice remained for a few years longer in the August and September fishery. Eventually the Department phased that out too and the entire season became managed via EO. What this has resulted in is heavy fishing effort on the Late run in August. When the late run is achieving its escapement goal, which normally isn't hard to obtain because the goal is pretty small in August (about 2,000 sockeye per day) and September, it usually results in continual fishing in the Chignik Bay & Central Districts throughout the month. While we appreciate the fishing opportunity, this "grind at will" philosophy is not conducive to a well dispersed late run population. The August portion of the Late run is generally small, and continual fishing in Area M over the years has already reduced the run from what it used to be. This, coupled with continual fishing within the Lagoon & Central Districts has resulted in great concern in Chignik that it has a negative impact on the ability of the myriad of small tributaries within the Chignik watershed to populate with sockeye. Not giving the sockeye a break from being fished leads to a less dispersed spawning population, which is not healthy for the Chignik watershed as a whole. In fact, at one time in the not-too-distant past there was discussion from the Department that Chignik actually had 3 sockeye runs, with the August/September run being that 3rd run.

Traditionally subsistence activities occur at any time prior to, during, and after the salmon start appearing in the Chignik Watershed, with May-July (Early run) and September into the late winter months (Late run) drawing the most effort and success. The August and September sockeye are crucial to the September through late winter subsistence users, specifically for "red

fish" which are heavily relied upon and are lower in oil and better for drying (their most common use). Weekly closures throughout August & September will naturally protect & enhance these subsistence opportunities as well. While this proposal removes the IRRG, traditional knowledge tells us that this goal will still be attained due to the proposed 48hr closures, which the Department acknowledges in their staff comments. This proposal will also ensure a more traditionally dispersed subsistence harvest opportunity as opposed to the current system where subsistence harvest opportunity mostly occurs after the commercial effort has ceased.

The current regulations also tend to cause a lost harvest opportunity on the September coho run in Chignik Lagoon. The current regulations allow no more than 48-hour maximum weekly fishing periods beginning September 15, but there are no limits prior to that date if minimum escapement is being met. The post-September 15 limits were put in place because subsistence users were unhappy with the continuous commercial harvest on the Late run that was affecting their ability to harvest "red fish" in their traditional areas and timing. The problem with that 48 hour limit is that it is not economically feasible for a commercial fishery and therefore results in foregone harvest opportunity on local coho stocks. This proposal aims to solve both problems by allowing weekly closures throughout August and September, which allows for a traditionally dispersed subsistence harvest opportunity, a more dispersed spawning population, and an economically viable coho fishery. The Department supports this aspect of this proposal.

Coho are also a voracious predator of juvenile sockeye within the Chignik watershed. The coho population was kept in check in past years through a healthy September commercial salmon fishery, prosecuted almost exclusively in Chignik Lagoon. With the struggles of both our Early and Late runs recently, the fewer predators of juvenile sockeye in our watershed, the better. The passage of this proposal will remove roadblocks to that September fishery returning and the harvest of the surplus coho that return to the Chignik watershed every year.

This is only one of a suite of proposals from Chignik stakeholders that have been submitted because of the Department's inaction on protecting our salmon runs. This has prompted a concerted effort by our communities and tribal members to work toward conserving our runs while still providing commercial fishing opportunity. At this time, additional actions are required to ensure the sustainability of our main resource. We do not want our late run to collapse as our early run has.

Sincerely,

George Anderson
President, Chignik Intertribal Coalition

PC29

CHIGNIK INTERTRIBAL COALITION
127 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565

February 6, 2023

Subject: Support for proposal 133

A brief explanation of the history of 5 AAC 09.365, the South Unimak and Shumagin Islands June Salmon Management Plan, helps to underscore how the expansion of Area M salmon fisheries has significantly contributed to the contraction of Chignik's commercial and subsistence sockeye fisheries.

Area M salmon fisheries were built on intercepting what were thought to be "excess" fish from other areas (Bristol Bay, Kodiak, Cook Inlet, Prince William Sound and Chignik). They first developed as an intercept fishery in the False Pass area on what was thought to be Bristol Bay sockeye and later began to harvest more Western Alaska and Asian chum salmon. On the Southeast part of the peninsula, it also conducted a harvest of Chignik, Cook Inlet and Kodiak sockeye stocks, as well as migrating pink and chum stocks in addition to local pink and chum stocks.

Prior to 1973, fishing time was liberal and then during the late 1960s and early 1970s, controversy arose between Area M and Bristol Bay fishers concerning the South Unimak and Shumagin Islands June fisheries. From this time period on several regulatory changes were made in the South Peninsula salmon fishery, including GHLs, chum caps, coho caps, allocation plans, the implementation of the South Peninsula June Salmon Management Plan, the Southeastern District Mainland Management Plan, and the Post-June South Peninsula Management Plan, etc., which resulted in varying degrees of fishing time and area from season to season. These plans provided large enough windows for sufficient returns to Chignik, allowing healthy Area L harvest, subsistence opportunity and adequate escapement to maintain strong runs. From 1984-2003, for example, Seiners and Drifters averaged 229 fishing hours per June in South Unimak and seiners averaged 168 hours of fishing time per June in the Shumagin Islands. The Area M and Area K harvests closest to Area L, SEDM and Igvak, were managed on a direct allocation of Chignik sockeye stocks, which allowed harvest assurance for Chignik and shared the burden of conservation.

Since 2004, the Board's changes to 5 AAC 09.365 have resulted in reduced fish passage, increased interceptions, fleet expansion, previously un-fished areas open to exploitation, and a shift of effort to the eastern side of the South Peninsula June Salmon Fishery.

The Board's 2004 amendments to 5 AAC 09.365 dramatically increased fishing time for Area M seiners by 148% from the previous 20 year average of 168 hours, to 416 hours (by regulation) in the Shumagin Islands, and by 82% from the previous 20 year average of 229 hours, to 416 hours (by regulation) in the South Unimak Area **[Figures 1 & 2]**. The amendments also expanded the area already opened to fishing to include the entire Southwestern district, East and West Pavlof Bay, and Bechevin Bay, which were not open during June prior to 2004 **[Figure 3]**. In 2007 the Board further expanded fishing opportunities for drift gillnetters into the areas of the Southwestern District that were opened in 2004.

The Board's changes in 2004 also shifted heavy fishing effort eastward, from South Unimak into the newly opened portions of Southwestern and South Central Districts as well as the Shumagin Islands, which, despite the Board's belief that it would result in fewer chums being intercepted, actually drastically increased interception at the Shumagin Islands of Yukon-Kuskokwim chums as well as Chignik sockeye **[Figures 4 & 5]**. This drastic increase in fishing hours and area, coupled with the eastward shift in fishing effort has resulted in the severe reduction of salmon passage to natal streams in other areas such as Chignik and the Yukon-Kuskokwim.

In 2013 the Board changed the fishing schedule to allow for continuous fishing in the S. Unimak and Shumagin Islands from 6am, June 7th to 10pm, June 29th, resulting in 544 consecutive hours of fishing time, 416 hours for each gear type **[Figure 6]**. In 2019, the Board established 32 hour concurrent closures for all gear types, with seiners and drifters allowed 352 hours of fishing time and set gillnet remaining at 416 hours. **[Figure 7]**.

Fishing effort didn't just increase with increased fishing hours. The number of participating drift gillnet and seine permits has steadily increased since 2004 **[Figure 8]**. Harvest efficiency has also improved during this time through technological advancements to vessels, gear, electronics and communication, some as significant as the jump from the Rotary Dial Phone to today's cell phone so that more sets are made and more fish are caught each day.

Chignik harvesters, on the other hand, have faced severely reduced yield and escapement of sockeye to their spawning system since 2004, as the South Peninsula interceptions expanded and additional impacts from decreased ocean survival negatively affected the returns to Chignik. The Chignik commercial sockeye fishery was severely restricted to assure escapements and limited or blocked their access to local pink and chum stocks over concerns that sockeye might be harvested along with the pinks and chums. In 2018 and 2020 the Chignik sockeye fishery remained closed in an attempt to reach escapement goals on both the Early and Late runs. Neither goal was reached, with the 2020 early run reaching only 36% (137,213) of the minimum escapement goal (350,000) and the Late run reaching 88% (193,765) of the minimum escapement goal (220,000). In 2019 the Chignik sockeye fishery remained closed until mid-July in an attempt to reach the Early run escapement goals. The Early run escapement was not achieved in 2019. In 2021 the Chignik sockeye fishery remained closed until August in an attempt to reach escapement goals on both the Early and Late runs. The Early run escapement goal for 2021 was not reached, but instead

amounted to only 244,382 sockeye, which is 105,618 sockeye short of the Early run minimum escapement goal.

Due to the failure to reach even minimum escapement goals for the Chignik Early run from 2018-2021, Chignik stakeholders submitted, and the Board of Fisheries accepted, an ACR specifically requesting the Board help Chignik achieve Early run escapement by ensuring Chignik sockeye be given adequate time (windows for fish passage) to pass through the June Shumagin Islands fishery. Subsequently, in March of 2022 the Board designated Chignik's Early run a "Stock of Management Concern". At the March 2022 Board of Fisheries meeting an interim action plan was created as RC 104 **[see attached RC 104]**. This document was signed by the Area M Seiners Association and the Chignik Intertribal Coalition. The document outlined in-season management action that could be taken by the department if the Chignik River Early run escapement was not projected to be met, which included reducing the commercial salmon fishing periods in the Shumagin Islands Section of the Southeastern District by 50% for purse seine gear. In June 2022, the Chignik River Early run escapement objectives were not being met, and so on June 15, June 20, and June 25, commercial salmon fishing openings for purse seine gear in the Shumagin Islands Section of the Southeastern District were limited to 40 hours per opening to allow Chignik Early run sockeye time to pass through the area. The result of this interim action plan was a success. The Chignik Early run escapement was achieved for the first time since 2017.

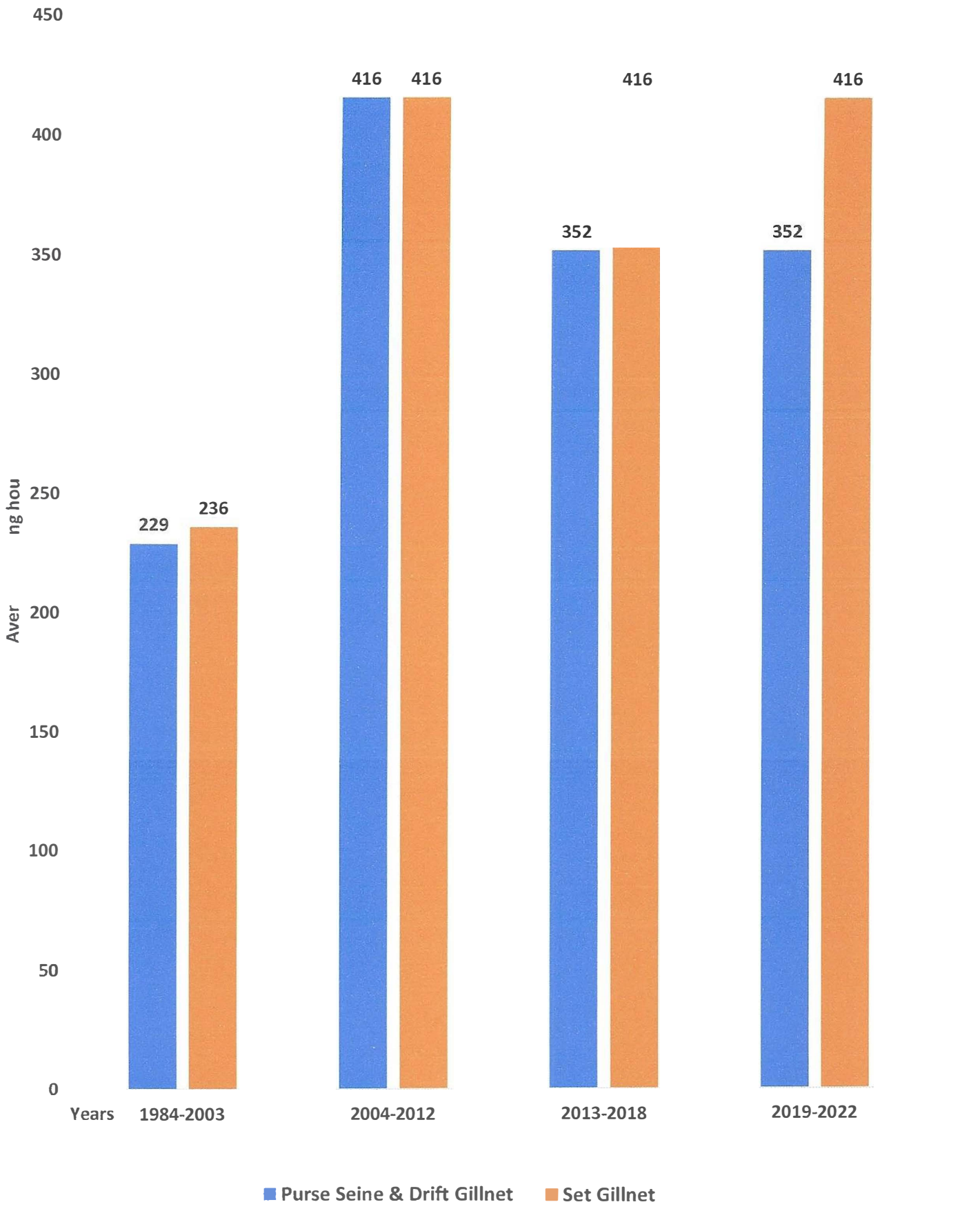
The changes made at the 2004 Board of Fisheries meeting were extremely detrimental to Chignik, Western Alaska, and other Gulf of Alaska salmon stocks. Proposal 133 presents the Board with an opportunity to reverse some of the harms caused by those changes. The 2022 adjustments via the interim action plan were a good start, but the Board of Fisheries is tasked with more than just helping a fishery achieve escapement goals. They are also required to ensure that fishery management regulations are consistent with and comply with the sustained yield clause of the Alaska Constitution. AS 16.05.251(d). We support Proposal 133 because it will provide Chignik an opportunity to achieve more than just escapement, but also sustained yield from the Chignik commercial and subsistence sockeye fisheries.

Sincerely,

George Anderson,

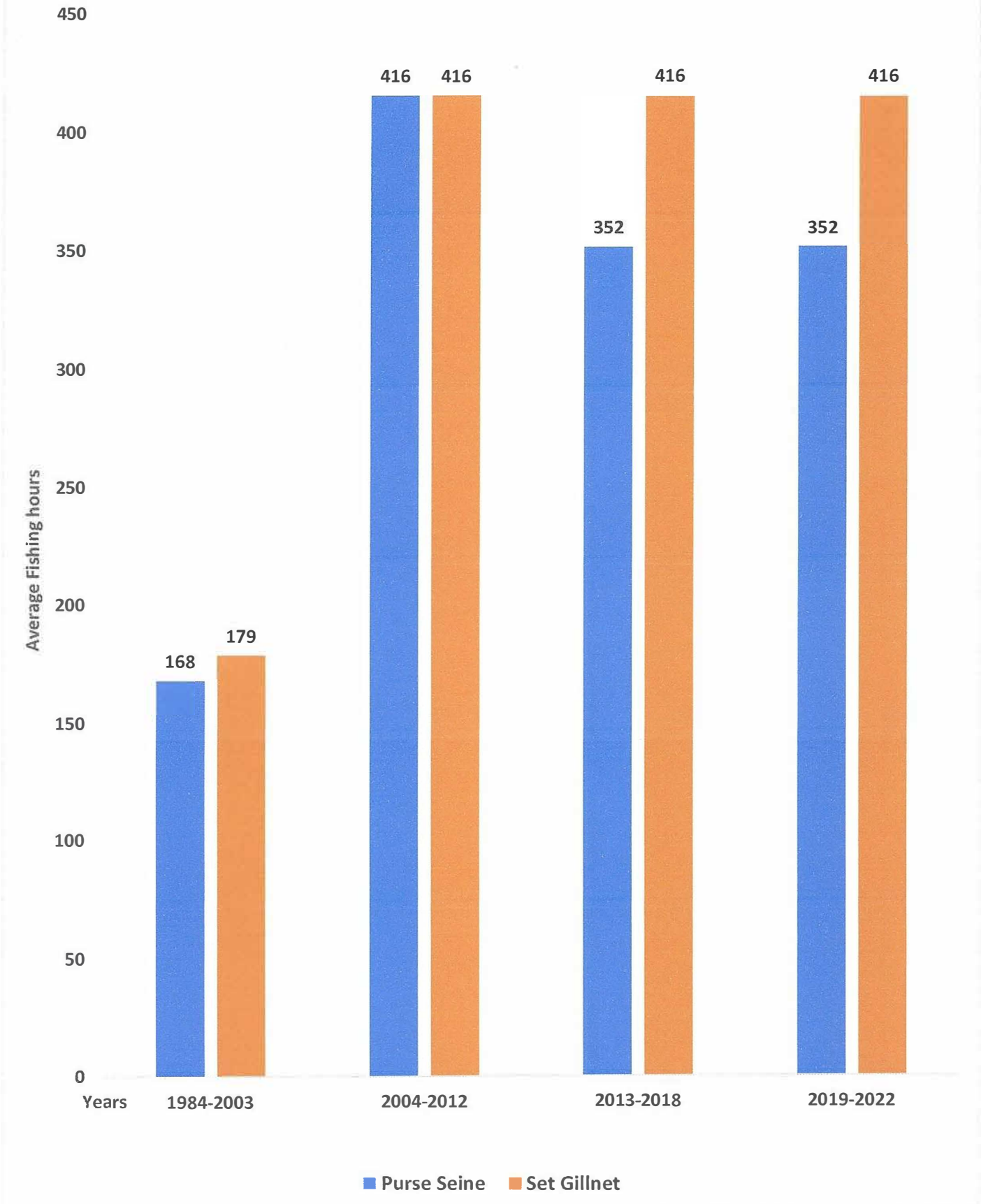
President, Chignik Intertribal Coalition

Figure 1



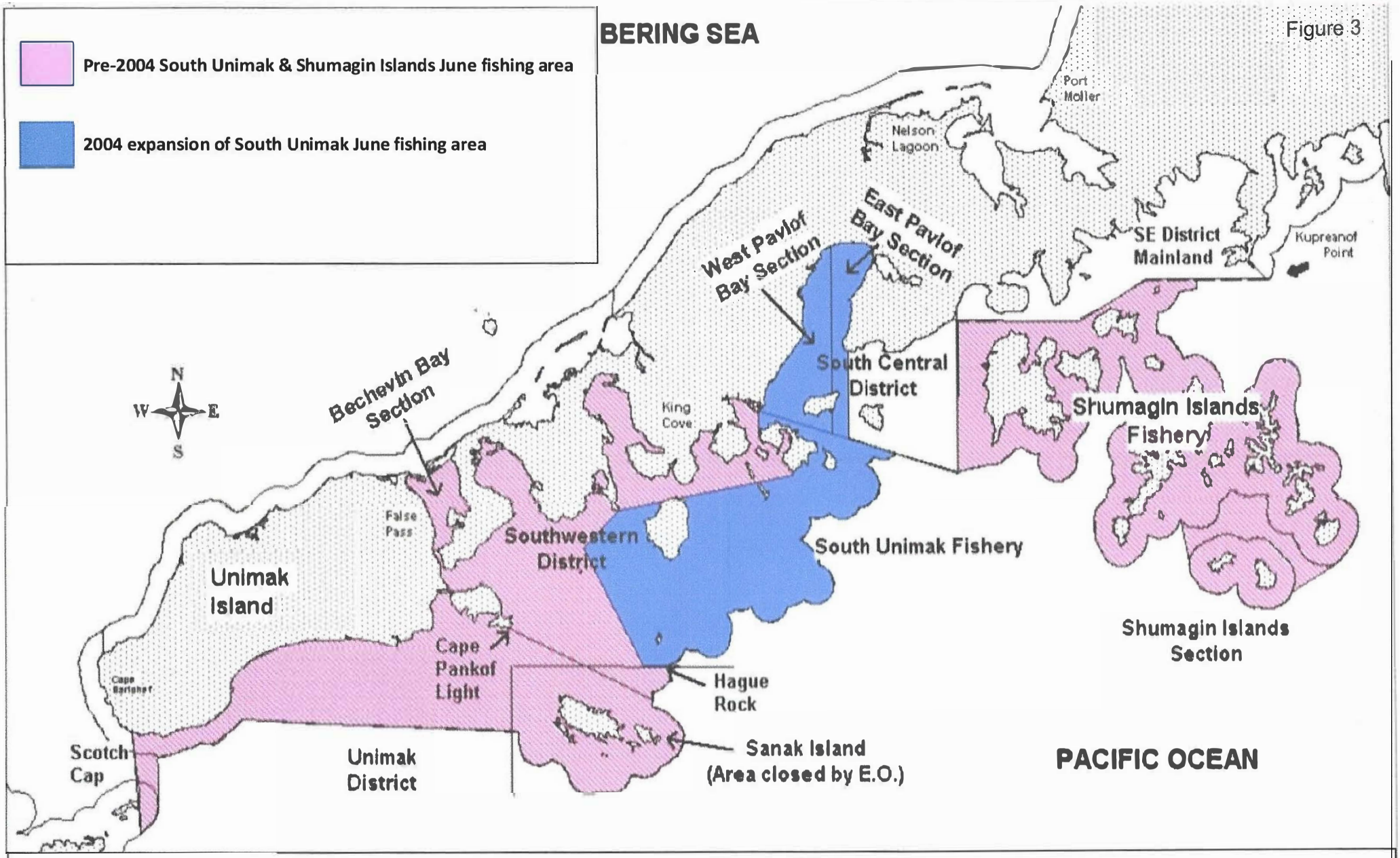
Source: Pages 62-63, Appendix B3, 2013 South Alaska Peninsula Salmon AMR & Page 4, 2022 South Alaska Peninsula Salmon AMR

Figure 2



Source: Pages 62-63, Appendix B3, 2013 South Alaska Peninsula Salmon AMR & Page 4, 2022 South Alaska Peninsula Salmon AMR

Figure 3



1975 – 2003

* 77% of sockeye harvested in Unimak District
* 23% of sockeye harvested in Shumagin Islands

* 76% of chums harvested in Unimak District
* 24% of chums harvested in Shumagin Islands

2004 – 2022

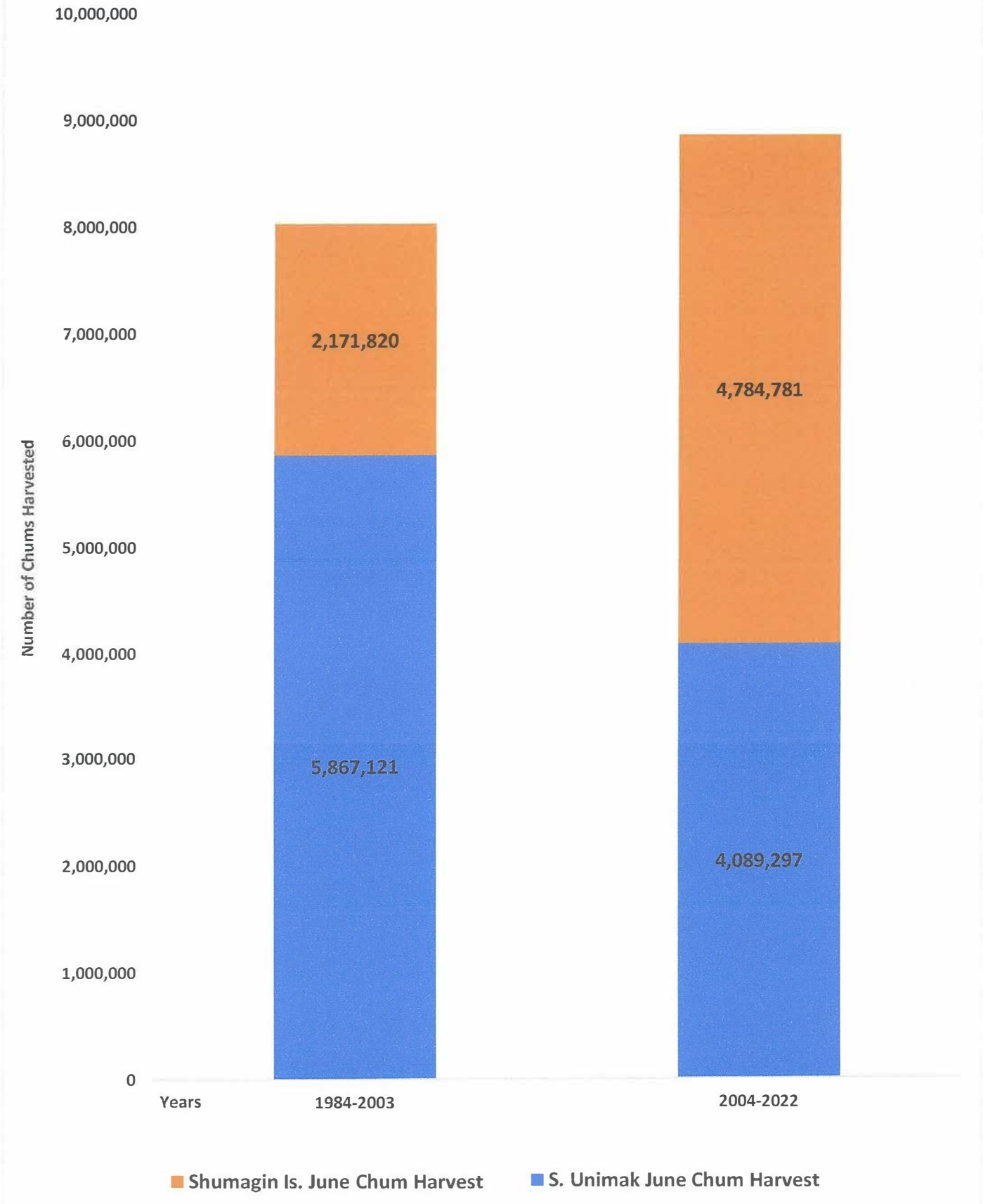
* 61% of sockeye harvested in Unimak District
* 39% of sockeye harvested in Shumagin Islands

* 46% of chums harvested in Unimak District
* 54% of chums harvested in Shumagin Islands

Source: Pages 88-89, Appendix B5 & B6, 2009 South Alaska Peninsula Salmon AMR, Pages 73 & 78, Appendix B7 & B12, 2022 South Alaska Peninsula Salmon AMR, Page 27, Figure 2, 2006 South Alaska Peninsula AMR

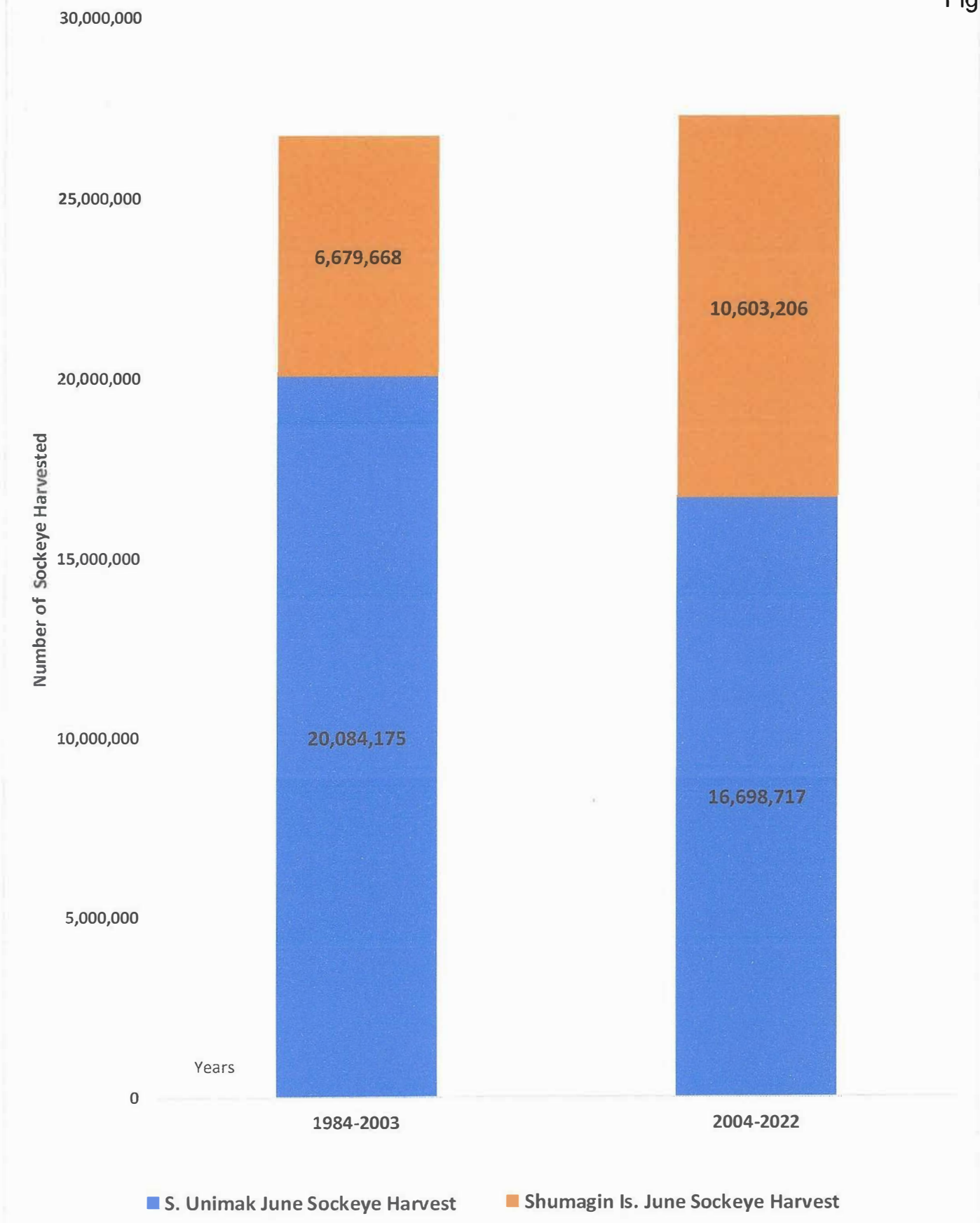
PC29

Figure 4



Source: Pages 88-89, Appendix B5 & B6, 2009 South Alaska Peninsula Salmon AMR & Pages 73 & 78, Appendix B7 & B12, 2022 South Alaska Peninsula Salmon AMR

Figure 5


Increase In June Shumagin Is. Sockeye Harvests Since 2004 BOF Action
30,000,000
25,000,000
20,000,000
15,000,000
10,000,000
5,000,000
0
Number of Sockeye Harvested
6,679,668
10,603,206
20,084,175
16,698,717
Years
1984-2003
2004-2022
S. Unimak June Sockeye Harvest
Shumagin Is. June Sockeye Harvest

2013-2018 REGULATIONS - S. Unimak & Shumagin Islands June Salmon Fishery Openings						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1	2
3	4	5	6	7	8	9
					SET GILLNET	
10	11	12	13	14	15	16
6 am – 10pm	SEINE	6am	10 pm SET GILLNET		6 am – 10pm	SEINE
17	18	19	20	21	22	23
6am	10 pm SET GILLNET		6 am – 10pm	SEINE	6am	10 pm SET GILLNET
24	25	26	27	28	29	30
	6 am – 10pm	SEINE	6am	10 pm SET GILLNET	10pm	

Set Gillnet - 416 hours of fishing time in June

Seine & Drift Gillnet - 352 hours of fishing time in June

544 CONSECUTIVE FISHING HOURS FROM JUNE 7TH - JUNE 29TH

Source: page 66, Appendix B-1, 2022 South Alaska Peninsula AMR (ADF&G)

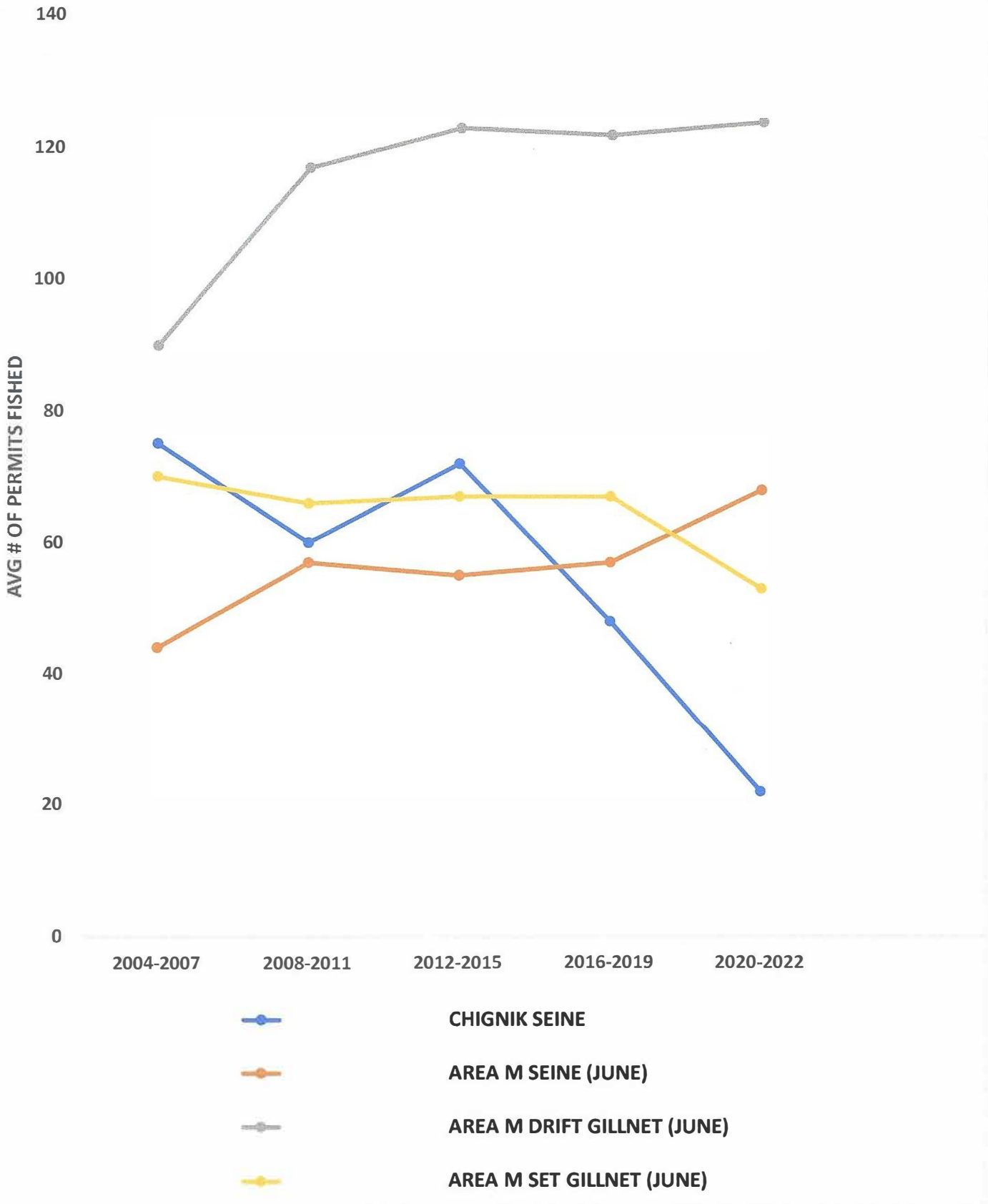
2019-2022 REGULATIONS - S. Unimak & Shumagin Islands June Salmon Fishery Openings						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1	2
3	4	5	6	7	8	9
			6 am	SET GILLNET	10 pm	
10	11	12	13	14	15	16
6 am	SEINE SET GILLNET		10 pm		6 am	SEINE SET GILLNET
17	18	19	20	21	22	23
SEINE SET GILLNET	10 pm		6 am	SEINE SET GILLNET		10 pm
24	25	26	27	28	29	30
	6 am	SEINE SET GILLNET		10 pm		

Set Gillnet - 416 hours of fishing time in South Alaska Peninsula in June

Seine & Drift Gillnet - 352 hours of fishing time in South Alaska Peninsula in June

Source: page 67, Appendix B-1, 2022 South Alaska Peninsula AMR (ADF&G)

Figure 8



Source: Page 30, Appendix A9, 2022 South Alaska Peninsula Salmon AMR & Pages 70-71, Table 31, 2022 Chignik Management Area AMR

3/29/2022

RC104

The framework below represents the understanding between the Chignik Intertribal Coalition and the Area M Seiners Association regarding how the Alaska Department of Fish and Game may manage fisheries to conserve Chignik River early run sockeye salmon in 2022 following the Alaska Board of Fisheries' designation of Chignik River early run sockeye salmon as a Stock of Management Concern. This framework is not an action plan and does not restrict the Alaska Department of Fish and Game's emergency order authority to manage salmon stocks for sustained yield in both the Chignik and South Alaska Peninsula Management Areas.

Based on early run sockeye salmon escapement at the Chignik Weir, fishing time for purse seine gear, during the second fishing period, under the *South Unimak and Shumagin Islands June Sockeye Salmon Management Plan* would be reduced by 50%, in the Shumagin Islands Section, in order to achieve the lower bound of the Chignik River early run sockeye salmon escapement goal.

Fishing time for purse seine gear under the *South Unimak and Shumagin Islands June Sockeye Salmon Management Plan* would continue being reduced during subsequent fishing periods to meet the lower bound of the Chignik River early run sockeye salmon escapement goal.

If the lower bound of the Chignik River early run sockeye salmon escapement goal is projected to be met restrictions in the South Alaska Peninsula fishery would be lifted and commercial salmon fishing periods in the Chignik Management Area may be warranted.

If the lower bound of the Chignik River sockeye salmon early run escapement goal is not projected to be met by July 1, a mixture of restrictions, including a 50% reduction in fishing time for purse seine gear during the first commercial salmon fishing period in July in the Shumagin Islands Section, would be applied to fishing opportunity in the South Alaska Peninsula Area under the *Post-June Salmon Management Plan for the South Alaska Peninsula* and in the Chignik Management Area. The department would attempt to balance providing harvest opportunity on Chignik late-run sockeye salmon in the Chignik Management Area, and local South Alaska Peninsula stocks in the South Alaska Peninsula Area while continuing to conserve Chignik early run sockeye salmon.

Subsistence fishing for sockeye salmon in the Chignik Management Area would not be restricted.

George Anderson, Chignik Intertribal Coalition

Kiley Thompson, Area M Seiners Association

PC29

CHIGNIK INTERTRIBAL COALITION
127 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565

February 3, 2023

Comments on Proposed Escapement Goal Revision; opposition to Proposals 105 and 132.

The Chignik Intertribal Coalition has numerous concerns regarding ADF&G's proposed combination of the genetically distinct Early (Black Lake) and Late (Chignik Lake) Chignik sockeye runs into a single escapement goal for the Chignik River system. We were not convinced by ADF&G's April memo nor the subsequent submittals and comments by the Department that could justify such drastic change to our management. It appears to us that this approach is the Department's attempt to simply circumvent the Board of Fisheries designation, under the Sustainable Salmon Fisheries Policy, of Chignik's Early run as a "Stock of Management Concern." This change has important implications for the long-term sustainability of the Chignik salmon fisheries and the livelihoods of people who depend on them.

There are many issues within Proposal 105, and subsequently Proposal 132, that require further discussion and outside expert review as done in other systems facing similar major changes to management goals. Our first major concern is the Department's decision to switch to a single escapement goal for the Chignik River system. The motivation for switching to a single escapement goal is not logically clear. Moving to a single escapement goal removes the conservation management requirements for the Early run and provides the singular escapement goal to be achieved throughout the latter two months of the season with little regard to the escapement of Early run sockeye in June. This strategy would risk overexploiting the Early run stock during years of weak returns. Further, the proposed change from two distinct escapement goals - a BEG and an SEG - into a single BEG assumes that mere overlap in juvenile rearing habitat creates a single bottleneck in the ecosystem which justifies a single BEG. This reasoning is based on a series of assumptions, not on empirical evidence that the hypothesis is correct, nor a watershed wide evaluation of fry/smolt dependence. There is no doubt that some juvenile sockeye from the early and late runs overlap in their Chignik Lake habitat use during certain parts of their life cycle, and our understanding of the system tells us that has always been true. However, there is no clear evidence that density-dependent processes in these two stocks play out at this single life stage. There is no scientific justification to combine the two genetically

distinct Chignik sockeye runs into a single season-long escapement goal. It appears that the new combined escapement goal is the Department's solution to deal with their inability to manage the two Chignik sockeye returns without placing additional restrictions on Area M. If the Department feels each individual escapement goal needs to be reduced, that can be accomplished while maintaining the two genetically distinct escapement goals for each run.

This plan is inconsistent with management of other sockeye stocks with early and late run components (including stocks close to Chignik and on Kodiak). While some Bristol Bay systems have a singular escapement goal for multiple stocks, this is done out of necessity rather than by choice. The nature of the Bristol Bay sockeye returns do not allow for the management of the escapement of early and late run returns due to the volume and overlapping timing of those stocks. Chignik, on the other hand, has a small sockeye run where escapement occurs over a more protracted time than Bristol Bay returns, which are immense and occur over just a few weeks. There is little similarity between Bristol Bay and Chignik.

The Department's ultimate rationale in combining the Early and Late run escapement goals in Chignik is to eliminate their chronic inability to reach Early run escapement and removes a sustainable fishery policy problem for them, but does nothing for the conservation of the Chignik sockeye run as a whole, and the Early run in particular. Further, we are distinctly concerned that aggregating these stocks into a single management unit puts them at higher risk of sub-optimal management because changes in productivity of the two stocks may not be obvious when treating them as a single homogeneous stock. The scientific basis for managing multiple sockeye stocks at Chignik has been developed over most of the last century - the recent changes are a step back from this rich body of knowledge the Department and others have accumulated. It is scientifically irresponsible to not study the biological consequences of the Department's decision to move to a single escapement goal for the Chignik River system.

The second issue we would like to address is the Department's desire to reduce the overall escapement in the Chignik River system. The Department claims that the productivity of the Chignik River system is not what it used to be. They came to that conclusion through the use of selective data to develop run reconstruction and Brood Tables. By doing run reconstruction based solely on WASSIP areas that only exhibited at least a 50% presence of Chignik stocks, ADF&G ignored the presence of Chignik stocks in other areas that would have counted toward Chignik productivity. To be more precise, ignoring the fact that 47% of the sockeye harvested in the Dolgoi Area were Chignik bound is clearly not using the best science available. Determining productivity and Brood Table propagation from unaccounted Mortality (M) from significant harvests in the Dolgoi Area, Shumagin Is. and even South Unimak, is part of how analysts chose a single escapement goal option and a reduction in overall escapement. Not using all of the data, which is readily available, results in a deeply troubling position of the Department deciding to lower escapement goals. We are also concerned about the extensive reliance on WASSIP in general for estimating impacts of productivity for two

reasons. First, the 2006-2008 base years do not reflect what the Area M fishery has developed into today. Second, it assumes that interceptions are similar year to year and that Bristol Bay, Kodiak, Cook Inlet, Prince William Sound and Chignik stocks do not fluctuate and that there is no variation of return timing and transit location; which we believe to be false assumptions.

Without further analysis and evidence we believe that lowering the escapement goals in Chignik merely eliminates the Department's chronic inability to reach escapement and resolves a sustainable fishery policy problem for them. We are confident that the attempts to solve this problem will create many more problems for the Department and the Board of Fisheries in years to come as the Department's plan runs counter to the conservation of Chignik sockeye runs as a whole, and the Early run in particular.

We are currently in a period of rapid environmental change. Now is the time to ramp up monitoring efforts and precautionary approaches to protect weak stocks, especially stocks like Chignik's Early run. ADF&G's proposed changes do neither.

We encourage the Board to request a precautionary and scientifically responsible approach by the Department through an open, transparent and collaborative review panel which includes Department scientists, stakeholders, and outside experts to review the choice of any changes to the Chignik escapement goals and the biological and economic consequences of such changes.

Sincerely,

George Anderson, President

Chignik Intertribal Coalition

PC29

CHIGNIK INTERTRIBAL COALITION
127 AIRPORT ROAD
CHIGNIK LAGOON, ALASKA 99565

February 6, 2023

Subject: Proposals 105 and 132

The Chignik Intertribal Coalition opposes Proposals 105 and 132 for the reasons stated below.

Background information

The Chignik River hosts two genetically distinct sockeye salmon stocks – the early run and the late run – that have been managed as two distinct stocks by ADF&G since at least 1968. For decades, the early run has been subject to a biological escapement goal (BEG) of 350,000 to 450,000 fish. The late run has been subject to a sustainable escapement goal (SEG) of 200,000 to 400,000 fish. Recently, the early run failed to achieve the lower end of its BEG at least three times – in 2014, 2018, and 2020.

Timeline of Board and ADF&G Actions

ADF&G's presentation of Proposals 105 and 132 circumvent the normal regulatory proposal process, deprive members of the public of the opportunity to comment on significant management changes, and ignore the Board's stock of management concern determination.

- **March 26-April 2, 2022**: the Board holds a meeting where it considered an out-of-cycle regulatory proposal to address the early run's failure to achieve escapement goals.
- **March 30, 2022**: after reviewing ADF&G's salmon stock status reports for the Chignik Management Area and receiving public input, the Board unanimously voted to designate the early run a stock of management concern as a result of the early run's chronic inability to meet the lower end of the BEG. The Board directed ADF&G to develop a draft action plan describing a suite of potential management measures designed to rebuild the early run,

including a description of conditions that must be met to remove the stock of management concern designation, and further directed ADF&G to make the draft action plan available for review prior to this in-cycle meeting.

- **April 8, 2022:** Just over a week after the Board determined the early run was a stock of management concern, ADF&G issued a memorandum announcing that in February 2022, it determined that it would no longer manage the early run and late run as two separate stocks subject to two separate escapement goals. Instead, ADF&G would manage these two genetically distinct stocks under one combined BEG of 450,000 to 800,000 fish. ADF&G did not publicly disclose this significant change in management to the Board during the March 2022 meeting.

- **April 11, 2022**: The deadline to submit regulatory proposals for the 2023 in-cycle meeting, less than two weeks after the Board's stock of management concern determination. Neither Proposal 105 nor Proposal 132 acknowledged the Board's stock of management concern designation. Instead, Proposals 105 and 132 state:

  > "In April 2022 the Alaska Department of Fish and Game changed the Chignik River sockeye salmon escapement goal from early and late run goals to a single goal. Several management plans reference two sockeye salmon escapement goals for the Chignik River. This proposal does not suggest a specific change to the management plan, rather it is meant to serve as a signal that the Alaska Board of Fisheries may wish to consider amending the Chignik Area Salmon Management Plan [and the Southeastern District Mainland Salmon Management Plan] in response to the new Chignik River sockeye salmon escapement goal."

- **January 4, 2023**: The Chignik AC meets to consider regulatory proposals and make recommendations to the Board. ADF&G makes Staff Comments on proposals 105 and 132 available to AC members during the meeting; Staff Comments are not provided to all AC members prior to the meeting. Chignik AC members present at the meeting unanimously oppose Proposals 105 and 132.

- **January 17, 2023**: ADF&G published Staff Comments on regulatory proposals (RC 2). Rather than simply offering comments on Proposals 105 and 132, ADF&G instead proposed significant revisions to 5 AAC 15.357 and 5 AAC 09.360. ADF&G's Staff Comments on Proposals 105 and 132 do not explain why the regulatory revisions were not submitted by the April 11, 2022, proposal deadline. They do not address any biological or sustainability consequences resulting from managing the early and late run under a single BEG. They do not acknowledge the Board's determination that the early run is a stock of management concern. And, they do not propose any goals, objectives, or other actions necessary to rehabilitate the early run stock out of that designation.

- **February 6, 2023**: the comment deadline for this meeting. By the end of this day, ADF&G had not made available any draft action plan responding to the Board's stock of

management concern determination for the early run, depriving the public and the Board of sufficient opportunity to weigh in on the draft action plan before this meeting.

Policy for the management of sustainable salmon fisheries (5 AAC 39.222)

The policy for the management of sustainable salmon fisheries authorizes the Board to determine if a stock of concerns exist and establishes a process for identifying those stocks and adopting specific action plans to rehabilitate those stocks. Proposals 105 and 132 violate this policy.

The policy authorizes the Board to determine if a stock of concerns exist. 5 AAC 39.222(d)(3). If the Board determines that a stock of concern exists, the Board is then authorized to develop or amend a management plan for the affected stock that prescribes regulatory action to address the concern. 5 AAC 39.222(d)(3). The policy then authorizes the Board to collaborate with ADF&G in the development and periodic review of an action plan that contains goals, measurable and implementable objectives, and fishery management actions needed to achieve rebuilding goals and objectives for the stock in question. 5 AAC 39.222(d)(4).

Proposals 105 and 132 and subsequent Staff Comments disregard this entire process. Neither proposal nor their associated Staff Comment acknowledges the Board's stock of management concern determination. Neither proposal provides the Board with a draft action that meets the criteria laid out in 5 AAC 39.222(d)(4). The proposals are an end-run around the process laid out by the policy for the management of sustainable salmon fisheries for developing and implementing an action plan for stocks of concern. Approving these proposals will violate 5 AAC 39.222 and undermine the crucial role played by the Board in ensuring that ADF&G's management actions are compliant with conservation and sustained yield principles.

Effect upon subsistence

Neither Proposal 105 nor 132 addresses how managing the early and late run as a single stock under one BEG will impact subsistence uses of early and late run fish where those subsistence uses are managed by ANS amounts specific to both the early and the late run. 5 AAC 01.466 establishes the ANS (amount necessary for subsistence) of early run and late run sockeye salmon. In the Chignik Bay, Central, and Eastern Districts combined, 2,900 to 5,400 early run sockeye and 3,200 to 6,000 late run sockeye are reasonably necessary for subsistence uses.

The Alaska Constitution and Alaska Statutes and regulations require ADF&G to sustainably manage salmon stocks to ensure future returns and to prioritize subsistence uses over nonsubsistence uses. Here, ADF&G does not appear to have prioritized subsistence uses because ADF&G has completely failed to disclose any proposed change in management of subsistence uses of early and late run sockeye salmon. ADF&G's failure, in turn, deprives the public – in particular, the subsistence users within the Chignik Bay, Central, and Eastern districts who have a

customary and traditional use of and late run sockeye salmon – of an opportunity to weigh in on how ADF&G's proposals may detrimentally affect their subsistence needs.

Sincerely,

George Anderson
President, Chignik Intertribal Coalition

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 105: Oppose **Proposal 109:** Support **Proposal 132:** Oppose **Proposal 133:** Support

PC30

January 31, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska and I participate in commercial, subsistence, and sport fisheries. Salmon fishing in the South Alaska Peninsula region is very important as it's my only source of income for me and my family.

Sincerely,

Robert Christiansen
t-jacks@hotmail.com
(907) 299-9974

PC31

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska and I participate in commercial fisheries. Salmon fishing in the South Alaska Peninsula region is important because it is how we make our living.

Sincerely,

Howard Christiansen
kccadmin@artic.net
(907) 499-7731

PC32

Name: Craig Chythlook

Community of Residence: North Pole, AK

Comment:

Support proposal 106, community is asking for more subsistence opportunity before the commercial season kicks off.

Support proposal 128, better conservation efforts supported by local folks.

Support proposal 140, any of the proposals looking to reduce commercial harvest during times when CWAK stocks are making their north through this area should be supported. Any conservation efforts that allow salmon bound to the AYK river systems and tributaries need to have some priority for subsistence and personal use before commercial harvest. There are other proposals similar to proposal 140, and I would encourage those too, however prioritizing regulatory action that was previously enacted should take precedent. This same thought process, I would encourage the board to consider not supporting any proposals that are looking to increase Alaska Peninsula harvest because it is fairly well known that this is an intercept fishery. We have no AYK subsistence fishery happening for the last two years and we have a new stock of concern designation for the Bristol Bay chinook salmon, because escapement has not been met five of the last six years. Increasing harvest of fish bound for other regions with both these scenarios playing out does not make sense at this time.

Oppose 151, Doesn't make sense to add an extra 25 fathoms of mixed gear type to a gillnet fishery.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Support **Proposal 128:** Support **Proposal 140:** Support **Proposal 151:** Oppose

PC33

KING COVE
A L A S K A

PO Box 37
King Cove, AK 99612

RESOLUTION 23-14

A RESOLUTION SUPPORTING CURRENT SOUTH ALASKA PENINSULA MANAGEMENT PLAN & OPPOSING CERTAIN PROPOSALS BEFORE THE ALASKA BOARD OF FISH

WHEREAS, the City of King Cove is a major salmon community within the Alaska Department of Fish and Game Management Area M; and

WHEREAS, the City's historic and current financial dependency on salmon has been a major cornerstone of our economy and economic livelihood for over 100 years; and

WHEREAS, King Cove salmon fishermen will be defending our fisheries and livelihoods at the February 2023 Board of Fisheries Alaska Peninsula.Aleutian Islands/Chignik Finfish meeting in Anchorage; and

WHEREAS, King Cove fishermen in conjunction with other South Alaska Peninsula salmon fishermen have been working tirelessly to address other region salmon concerns – to limit harvest of Chignik-bound sockeye salmon and to limit the harvest of AYK-bound chum salmon – sharing in the burden of conservation for those struggling stocks, a sacrifice that results in lost revenue for King Cove fishermen and the City; and

WHEREAS, previous actions by the Board of Fish and by Area M fishermen have resulted in improvements in Chignik Sockeye salmon escapement and commercial fisheries; and

WHEREAS, Area M salmon seine gear fishermen working together to avoid chum salmon during the June 2022 fishery resulted in the lowest June chum to sockeye salmon ratio in decades, noting that the majority of these chum salmon are Asian chum and not AYK-bound chums; and

WHEREAS, it is important to maintain the current South Alaska Peninsula Salmon Management Plan in order for these fishermen conservation efforts to continue to be successful; and

WHEREAS, these proposals would enact restrictive conditions, including reduced fishing times and area, that would hamper South Alaska Peninsula salmon fishermen conservation measures: Proposals 133, 134, 135, 136, 137, 138, 139, 140, 143, 148, 149, and 150; and

WHEREAS, restricting the South Alaska salmon fisheries will result in economic distress for King Cove families and businesses.

NOW, THEREFORE BE IT RESOLVED, that the King Cove City Council supports the conciliatory efforts by King Cove Area M fishermen sharing the burden of conservation of Alaska salmon that have yielded impressive results, and

BE IT FURTHER RESOLVED, the King Cove City Council supports the current South Alaska Peninsula Salmon Management Plan that will allow the time and area for our fishermen to continue these conservation efforts and feed our families, and

FINALLY, BE IT FURTHER RESOLVED, the King Cove City Council opposes the following Board of Fish 2022/2023 cycle proposals that would needlessly limit South Alaska Peninsula fishermen conservation efforts and opportunities to make a living and opposes Board of Fish 2022/2023 proposals 133, 134, 135, 136, 137, 138, 139, 140, 143, 148, 149, and 150.

PASSED AND ADOPTED by the King City Council on this 2nd day of February 2023.

Mayor Warren Wilson

Warren Wilson, Mayor

Cosette Bendixen, City Clerk

AYES 5
NAYS
ABSTAINED
ABSENT

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 133: Oppose	**Proposal 136:** Oppose	**Proposal 139:** Oppose	**Proposal 148:** Oppose
Proposal 134: Oppose	**Proposal 137:** Oppose	**Proposal 140:** Oppose	**Proposal 149:** Oppose
Proposal 135: Oppose	**Proposal 138:** Oppose	**Proposal 143:** Oppose	**Proposal 150:** Oppose

City of Sand Point, Alaska

On behalf of the City of Sand Point, a first-class city located in the Aleutians East Borough, I am writing to express the City's firm opposition to proposals before you, the Board of Fish, during the February 20-25, 2023 Alaska Peninsula/Aleutian Islands/Chignik Area Fisheries meeting. Namely, the City strongly opposes Proposals 133-141 and Proposals 148-150 that would further reduce the already curtailed fishing opportunities for the Sand Point-based fleet.

The City of Sand Point relies heavily on a 2% raw fish tax approved by the voters of the Sand Point, including nearly 100 local permit holders, to pay for the provision of public services in the community. The summer salmon season constitutes an ever increasing majority of the raw fish tax collected throughout the year. The raw fish tax pays for general government administration, public safety including police, fire and EMS, public works and helps to supplement the cost of a public water and sewer system. These are essential services that the residents, fleet and visitors rely on as part of a functional community.

Reductions last summer during the month June resulted in nearly 50% drop in raw tax revenue during the month when boats were forced to remain idle. The City has made considerable investment towards infrastructure to support the local and transient fleet for both salmon and other species of fish. To date, the City has issued over $4 million in General Obligation bonds with more than $1.9 million outstanding for the old harbor rehabilitation as well as a million-dollar revenue bond to pay for a new travel lift for boats that serve the local and transient fleet. These necessary investments to provide key infrastructure have placed a strain on the City's finances, but City leadership and voters, who approved of the bond by a public vote, believed that the investments would pay off by supporting the fishing industry that fuels the local economy and provides tax revenue for essential city services.

The local fishermen and the City have already shouldered the burden of conservation through the slashing of June fishing time. The proposals before the Board of Fish, especially 139 and 140, would be devasting to the commercial fishing fleet based in Sand Point and have a deleterious impact on the City's finances and imperil its ability to provide essential municipal services. If the Board of Fish adopts Proposal 139 and/or 140, then the City can expect another 50% reduction in raw fish tax beyond the 50% drop experienced last summer as result of the restrictions currently in place. The other proposals that seek to further limit the Sand Point fleet will also have negative fiscal impact on the fleet and the City's budget.

When our residents have the opportunity to fish and provide for themselves and their families, they do so with an unrivaled skill and enthusiasm that stems from the century plus tradition of fishing in the community. Their hard work and skill enable them to thrive and to help support the cost of local government to meet their needs. This community has seen hard times before that comes with the cyclical nature of the fishing industry, but the community has always had an opportunity earn a dignified living that comes with self-sufficiency. We do sympathize with our fellow coastal Alaskan who find themselves facing challenges in their fisheries, however, Sand Point has already ceded fishing time and further restricting the fishermen here will not remedy the issues they face.

Sincerely,
/s/
Jordan F. Keeler
City Administrator, Sand Point

City Office • P.O. Box 249 • Sand Point, Alaska 99661 • 907.383.2696 • 907.383.2698 FAX

Administrator • 3380 C Street, Suite 205 • Anchorage, Alaska 99503 • 907.274.7561 • 907.274.3540 FAX

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 105: Support
Proposal 106: Oppose
Proposal 107: Support With Amendments
Proposal 108: Support With Amendments
Proposal 109: Support With Amendments
Proposal 132: Support With Amendments
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC35

CONCERNED AREA M FISHERMEN

35717 Walkabout Road, Homer, Alaska 99603
(907) 235-2631

Marit Carlson-Van Dort, Chairwoman
Alaska Board of Fisheries
P.O. Box 25526
Juneau, Alaska 99802-5526

February 6, 2023

Re: Alaska Peninsula Proposals

Dear Ms. Van-Dort and Board Members:

Concerned Area M Fishermen (CAMF) submit these comments on proposals you will be considering at the upcoming meeting concerning fisheries of the Alaska Peninsula, also known as Area M. CAMF represents the interests of drift gillnet fishermen who fish in Area M. Our membership includes approximately 85% of the permit holders active in the fishery.

CAMF members participate in the drift gillnet fishery on the North Alaska Peninsula, which is managed under the provisions of the Northern District Salmon Fisheries Management Plan, 5 AAC 09.369, and the fisheries along the South Peninsula, including the South Unimak and Shumagin Islands June Salmon Fishery (the June Fishery), 5 AAC 09.365, and the Post-June Fishery, 5 AAC 09.366. CAMF has been active in the Board process for over 35 years, contributing to the development of these management plans, and we look forward to working with you again this year.

These comments are in two separate PC's. The first part will review the South Peninsula June fishery, including the history and importance of the fishery and prior Board actions and findings. We will also state CAMF's position on specific South Peninsula proposals. Secondly, we provide an overview of the North Peninsula fishery, including a discussion of prior Board actions, WASSIP results, some history of the fishery, the management structure, and the importance to the economy of the region. Here, too, we will outline our position on some specific proposals.

Thank you for taking the time to review these comments. We welcome the opportunity to discuss with you the particulars of the drift gillnet fisheries in which our members participate, and to answer any questions you may have regarding our position on specific proposals.

Sincerely,

Steve Brown, President
Concerned Area M Fishermen (CAMF)
35717 Walkabout Rd.
Homer, AK 99603

Proposal Number	CAMF Position	Description
		Subsistence and Sport (7 proposals)
98	**S**	Modify waters closed to subsistence fishing for salmon to increase access for subsistence users who are not commercial salmon fishery permit holders, as follows
99	**S**	Prohibit retention of king salmon and establish closed areas in the King Salmon River and Ridgerunner Creek, as follows
100	**S**	Prohibit retention of king salmon in King Salmon and Milky Rivers and Ridgerunner Creek, as follows
101	**S**	Prohibit retention of king salmon in King Salmon River and Ridgerunner Creek, as follows
102	**S**	Prohibit retention of king salmon in King Salmon River and tributaries of Bear River, as follows
103	N	Reduce the bag and possession limit for coho and sockeye salmon in the salt waters and freshwater drainages of Cold Bay, as follows
104	**S**	Repeal the closed water provisions for salmon fishing in Swanson Lagoon within the Alaska Peninsula and Aleutian Islands Area, as follows
		North Alaska Peninsula Salmon Northern District (10 proposals)
120	**O**	Modify fishing periods in the Northern District, as follows
121	**S**	Amend the fishing season in the Three Hills Section to increase potential fishing time and aligning sections to similar fishing periods, as follows
122	**S/A**	Amend fishing seasons to allow more commercial fishing time by allowing fishing periods in the Cinder River Section, as follows
123	**O**	Amend fishing seasons to allow more fishing time and area for set net gear in the Cinder River Section, as follows
124	**S/A**	Amend fishing seasons, fishing periods and gear to allow more commercial fishing time to all Registration Area M gear types in the Cinder River Section,
125	**S**	Amend closed waters to change the boundary line in the Outer Port Heiden Section, as follows
126	**O**	Amend closed waters and *Northern District Salmon Fisheries Management Plan* to reduce commercial salmon fishing time and area in the Outer Port Heiden Section, as follows
127	**O**	Amend fishing seasons to increase fishing time in the Caribou Flats Section, as follows
128	**O**	Amend Gillnet specifications and operations to reduce commercial salmon harvest in the North Peninsula using gillnet depth reductions, as follows
129	**S**	Allow use of monofilament gillnet web in the Northern District, as follows

The North Peninsula Fishery

The fishery in the Northern District of Area M is primarily a drift gillnet fishery, and is managed under the Northern District Salmon Fisheries Management Plan, 5 AAC 09.369. Operating out of Port Moller, our fleet fishes in the Bear River, Three Hills, Ilnik, and Outer Port Heiden Sections, and targets sockeye returning to local rivers. The North Peninsula fishery is orderly and well-managed. The Board has consistently rejected proposals from Bristol Bay fishermen and groups to restrict our fishery, and we request that you do so again this year.

We believe it would be helpful to review and summarize several aspects of the North Peninsula fishery, including prior Board action and the biology, history, and management of the fishery.

1. Prior Board Action

We first refer you to Board Findings 96-165-FB (formerly 96-09-FB) prepared at the meeting in January 1996. The Board had considered North Peninsula issues many times before that meeting, but this was the first time the Board prepared a set of findings to explain its actions. The findings summarize the comments of staff and the public and provide the Board's rationale for rejecting all the proposals aimed at greatly restricting the North Peninsula fishery. The findings conclude (at page 3):

> *"Like past Boards that have rejected proposals to restructure the North Peninsula fisheries, the Board found no reason to reduce fishing districts, seasons, or harvests in the Northern District. The Board recognizes that there may be some amount of interception of Bristol Bay fish in the Northern District. The Board further finds that the Northern District fishery is not an expanding fishery and does not warrant action under the Board's mixed stock policy."*

Consistent with these findings, the Board at its meeting in January 1998 again rejected proposals to restrict the North Peninsula fishery. The main action taken was to adopt the Northern District Salmon Fisheries Management Plan, 5 AAC 09.369. This plan confirmed the Board's and the Department's commitment to maintaining a management regime that has succeeded in achieving escapements, sustaining production, and allowing a steady harvest of high-quality fish. In fact, the principal action the Board took in 1998 was to adopt a regulation (5 AAC 09.369(j)) permitting us earlier access to the harvestable surplus from the Ilnik River, so that the fishery better fits the timing of the run.

Northern District proposals were next considered by the Board at its meeting in January 2001. As usual, Bristol Bay stakeholders advocated drastic restructuring of our fishery, relying primarily on their concerns for the status of Kvichak sockeye. Kvichak sockeye have since been removed from stock of concern list. The Board committee that reviewed the 2001 proposals found "There are no new or expanding fisheries on these stocks," and recommended status quo for the Northern District fisheries (RC # 384,

January 29, 2001). The Board unanimously voted in favor of this recommendation and rejected all the Bristol Bay proposals for our area.

The Board in 2004 made additional revisions to the Northern District plan, including easing restrictions regarding when our fleet could fish in the Ilnik Section. These changes were intended to provide additional management flexibility for the Department to harvest local runs while assuring that escapements are met.

In 2007 the Board responded to information presented by the Department showing a foregone harvest of more than 100,000 sockeye annually in the Meshik River. The Board opened up a portion of the Outer Port Heiden Section to the drift fleet, allowing us to fish on the north side of Port Heiden. The Board also authorized openings in the Ilnik Section northeast of Unangashak Bluffs, to better access returns to the Ilnik River, which likewise has experienced significant excess escapements. This regulatory change succeeded in harvesting the available surplus and bringing escapements in line with the established goals. At your meeting in 2010, the Board considered proposals to roll back these provisions. The Department, while neutral on the allocation aspects of these proposals, opposed them because they could result in decreased management flexibility and lost harvest opportunity. The Department recognized that since the opening of the Outer Port Heiden Section, "excessive surplus escapements into Meshik River have not occurred." *See* 2010 Staff Comments (RC 2). It should also be noted that the fishing schedule in this area is conservative, allowing us to fish only 2 ½ days per week, not continuously as implied by some.

At the 2013 meeting, the Board did make changes to the Northern District management plan that imposed some restrictions on our fishery in the Outer Port Heiden and Ilnik Sections, including a provision for rolling closures and a limit on how far from shore we could fish. These restrictions were largely repealed at the ensuing meeting in 2016. The Board's action in removing these unnecessary restrictions came in response to an agreement between CAMF and the Nelson Lagoon Advisory Committee that resolved many of the disputes in this area.

In sum, the Board over the years has taken several steps to improve management in our area and provide the Department the necessary management flexibility to harvest local runs while assuring that escapements are met. These actions should be seen as an endorsement of, and a demonstration of confidence in, the current management regime.

2. Harvest Rates

The 9-year (from inception to the time the written report was published), 9-million-dollar WASSIP study shows that Bristol Bay stocks are mixed in our North Peninsula catches to a higher extent than previous analyses suggested. However, the WASSIP results also show that our overall harvest rate on Bristol Bay stocks in the North Peninsula fishery was between 1.9% and 2.6%. This low harvest rate indicates that the impact of the North Peninsula fishery on Bristol Bay sockeye is

minimal. By comparison, the error in knowing the size of the Bristol Bay return after the season is over is in the range of 3 – 4 %, roughly double the impact of the North Peninsula fishery. Any suggestion that the North Peninsula fishery poses conservation or management concerns for Bristol Bay sockeye is not well grounded. Bristol Bay stocks, it now seems clear, have always been a component of our harvests along the North Peninsula, and are of great importance to the economy of the Alaska Peninsula region and to the survival of the Port Moller cannery. The Bristol Bay fishery is the largest sockeye fishery in the world, and it is unrealistic to expect that no Bristol Bay sockeye will be harvested in the nearby and far smaller North Peninsula fishery.

3. History of Fishery

Area M drift gillnetters have fished the Northern District since 1906, and early as 1915 harvests of sockeye on the North Peninsula exceeded 2 million fish. The 1960 Annual Management Report shows that as many as 50 vessels fished the Ilnik Section (as it was then defined). The amount of effort in the Ilnik and Three Hills Sections increased in the early 1980s, but this was primarily a function of increased returns to the North Peninsula and limited entry in the 1970's which increased the number of commercial salmon fishing permits statewide. The same phenomenon also occurred in the Ugashik and Egegik Districts of Bristol Bay, where returns to those systems resulted in nearly identical percentage increases in effort and harvest. Since 1983 our harvest has been relatively stable and has not increased out of proportion to the size of North Peninsula escapements. As the quote from the 1996 findings shows, the Board specifically found that the North Peninsula fishery was not new and expanding and did not require action under the mixed stock policy. The North Peninsula fishery has existed for and has been examined intensely by past Boards, none of which found any justification for adopting the kind of restrictions advocated by interests from Bristol Bay.

4. Dispersed Management

The North Peninsula drift fishery is very orderly and well-managed. By keeping our boats dispersed along the beach instead of concentrated around stream termini, area managers can avoid costly and management-intensive pulse fishing and escapements. This approach allows the managers to obtain a steady stream of escapement throughout the season which results in quality escapement for the entire salmon season. Our season lasts from June to mid-September, three or four times longer than the majority of Bristol Bay fisheries. The long coastline in our area is completely exposed to westerly weather, and fishing is inevitably interrupted in-season. If the fleet fished only in small areas in front of river mouths, these interruptions would produce excess escapement. Because of the small size of our rivers, we do not have the flexibility to move in-river to reduce over-escapement. Dispersing the fleet over a larger area provides a crucial buffer of time between weather interruptions and the build-up of fish in front of rivers as they prepare to move upstream.

The previous arguments by Bristol Bay interests for boxing in the North Peninsula fishery rest largely on the premise that terminal management, the way their fishery is managed in the Bay, should be applied elsewhere. This rationale ignores the differences

between the fisheries in the two areas and the nature of our respective fleets. The majority of the vessels in our fleet are larger, deep draft vessels built to handle an open ocean fishery. Forcing our fleet to fish in boxes around river termini, with shallow nets, will create a serious safety issue for our fishermen. Dispersing the fleet also minimizes conflicts among boats vying for sets and removes incentive for line violations. We have developed a system of self-regulation in which those who want to fish the line take turns making drifts. The result is a high-quality product – exactly what the state should support considering the modern market for salmon. Terminal management is the exception rather than the rule in Alaska, and for good reason. Another common misconception from constituents that want changes in the North Peninsula management style is the need to have "windows" or pre-determined closures in a fishery without any respect to excess escapement. Mandatory "windows" in an escapement based fishery will allow excessive escapements into river systems and result in significant lost harvest opportunity and negative long-term issues from repeatedly exceeding escapement goals. Orderly fisheries and quality products can best be maintained by other management methods.

For these reasons, we urge the Board again to reject proposals 120,126, and 128 that seek to restrict, or restructure, our North Peninsula fishery. There is nothing "broken" nor is there anything to "fix" on the North Peninsula, which is clearly successful. Therefore, in our opinion, there is no legitimate basis for the Board to adopt any of these proposals.

PROPOSAL 120

5 AAC 09.320. Fishing periods.

Modify fishing periods in the Northern District, as follows:…

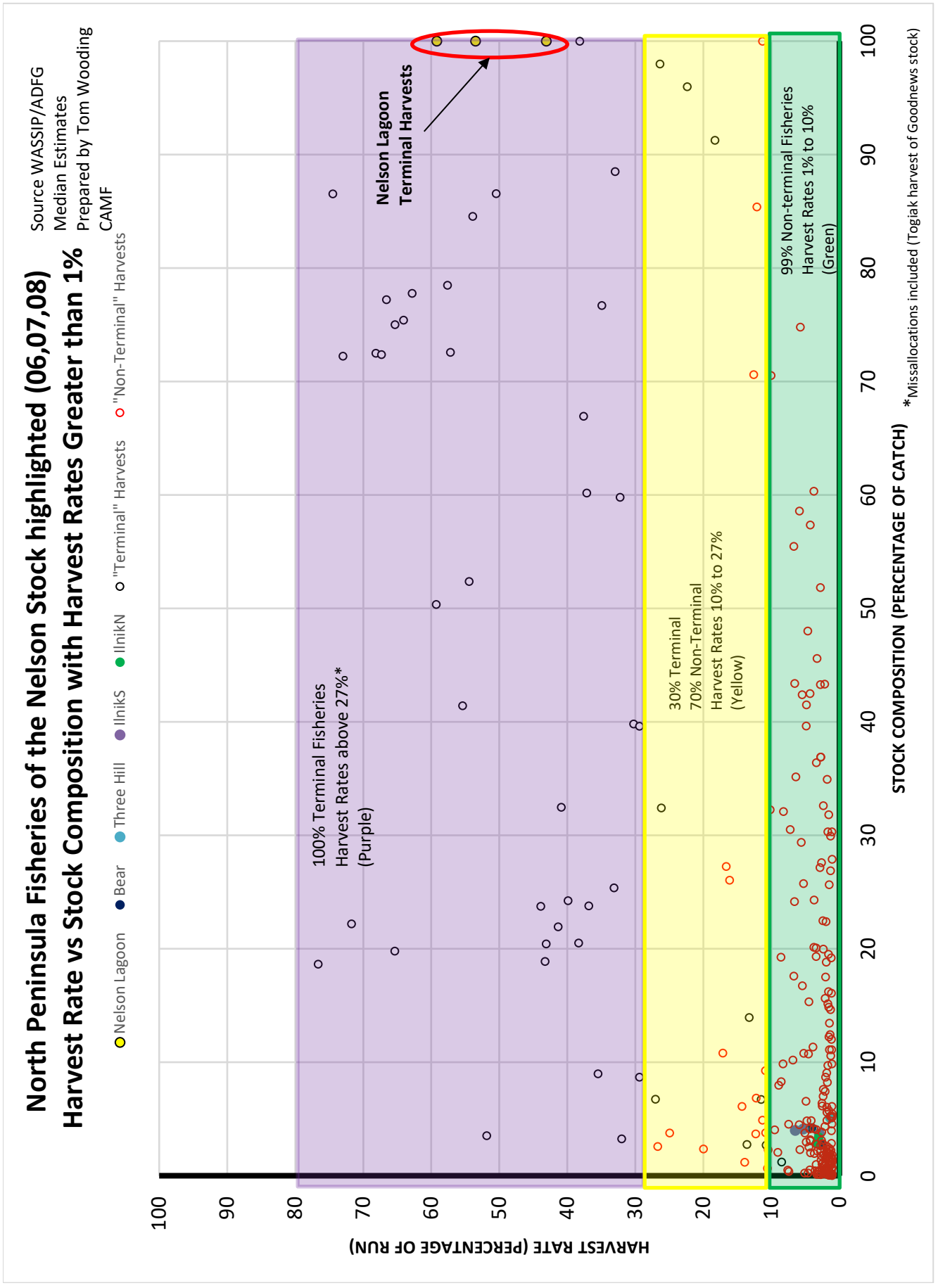
PROPOSED BY: *Mark McNeley (EF-F22-056)*

CAMF POSITION: OPPOSED

- Proposal 120 would severely restrict the ability of the department to manage the Bear, Sandy, Ilnik and Rivers for maximum sustained yield. Currently these systems are managed on the abundance of salmon and there is no need to change what has been working very well for a number of years.
- ADFG has always allowed harvest opportunity on the outside beach of the North Peninsula using weir counts and aerial surveys when escapement levels warrant openings. If escapement levels are below goals, the fishery is closed to allow additional escapement. In 2022 no fishing occurred in the Bear River, Three Hills, and a portion of the Ilnik Section in the proximity of Ocean River until July 8th when the Bear River experienced large escapements. This closed approximately 60 nautical miles of beach to the north of Nelson Lagoon. In addition, ADF&G had two 60-hour closures of the entire North Peninsula, one from July 1st (one day after the first interim escapement objective at Nelson River was not met) to July 4th and another from July 15th to 18th. Keep in mind there was adequate escapement in the Ilnik (upper escapement objectives were being met) and Meshik River systems at the time of the first 60 hour closure and when the second 60 hour closure occurred the escapement objectives were being met or exceeded at Bear, Sandy, Ilnik, and Meshik Rivers. The closures were an effort to pass sockeye to Nelson River. Unfortunately, ADF&G saw no large improvements in escapement in the Nelson River as a result of the closures and significant harvest opportunity was lost by the drift gillnet fleet on the outside beach.
- In 2022, the weekly commercial fishing period of 3 ½ days per week occurred for the entire return of the Nelson River sockeye run, except one week was shortened to 2 ½ days per week. No fishery closures occurred in 2022 or recent years in the Nelson Lagoon fishery and escapement goals have been met.
- Nelson Lagoon is similar to all terminal fisheries in WASSIP. Harvests of the Nelson River stock on the North Peninsula are similar to other non-terminal harvest in WASSIP. The observations are located in the cluster in the bottom left section of the graph which represents low percentage of the run and a low percent of the catch. (Figures 1 and 1b). *Note: For clarification the data set includes all 3 years of WASSIP, the 25 different fisheries, and the 23 different reporting stocks, for a total of 1725 observations (3x25x23=1725) plus the 3 years of fishery in Nelson Lagoon. The graph shows all observations above 1% harvest rate, or 269 points. "Terminal Harvests" are defined as harvests where the reporting stock is in the same district as the fishery. (i.e. Naknek Stock in NAK/KVI district) "Non-Terminal harvests" are defined as harvests that occur outside the reporting stocks district. (i.e., Egegik stock in NAK/KVI district)*

- Escapement goals have almost always been met, in fact Nelson River has met its escapement goal 49 of the last 50 years, the one exception was in 2011 when the sockeye salmon escapement was 8,000 fish below the lower end of the escapement goal. In 2011, the Nelson Lagoon fishery still occurred and the harvest was 75,000 sockeye salmon. There are no goals for chum salmon in Nelson Lagoon as stated in the proposal. Chinook (BEG) and coho (SEG) salmon escapements have been routinely met and no fishery closures occurred for either species (Figure 2)
- WASSIP results showed that a very high percentage of the Nelson River reporting stock return to Nelson Lagoon. 86% in 2006, 86% in 2007, and 96% in 2008 sockeye returned to Nelson Lagoon and either harvested inside the Lagoon or counted as escapement. (Figure 3)
- The Caribou Flats Section is currently closed to provide a buffer for the Nelson Lagoon Section. (Figure 4)
- Commercial fisheries on the North Peninsula date back to 1906 and the processing plant in Port Moller was built in 1912 and the future would be in serious jeopardy if Proposal 120 were adopted. If Proposal 120 were in effect in 2022, the North Peninsula harvest would have been reduced by about 65% and likely without any noticeable gain to Nelson River while the escapement goals at most rivers would have been grossly exceeded potentially reducing future salmon production on all North Peninsula rivers.

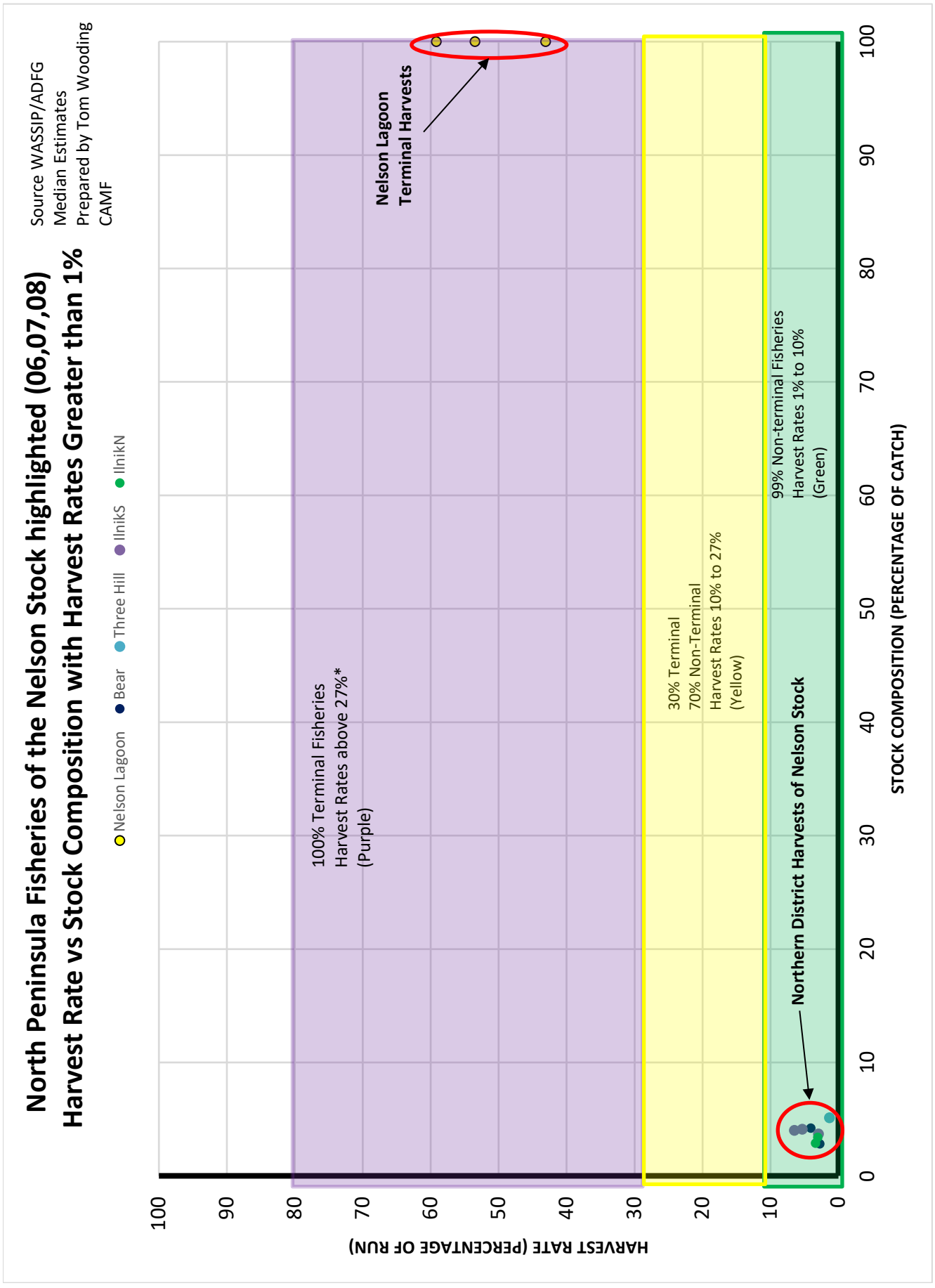
Figure 1.



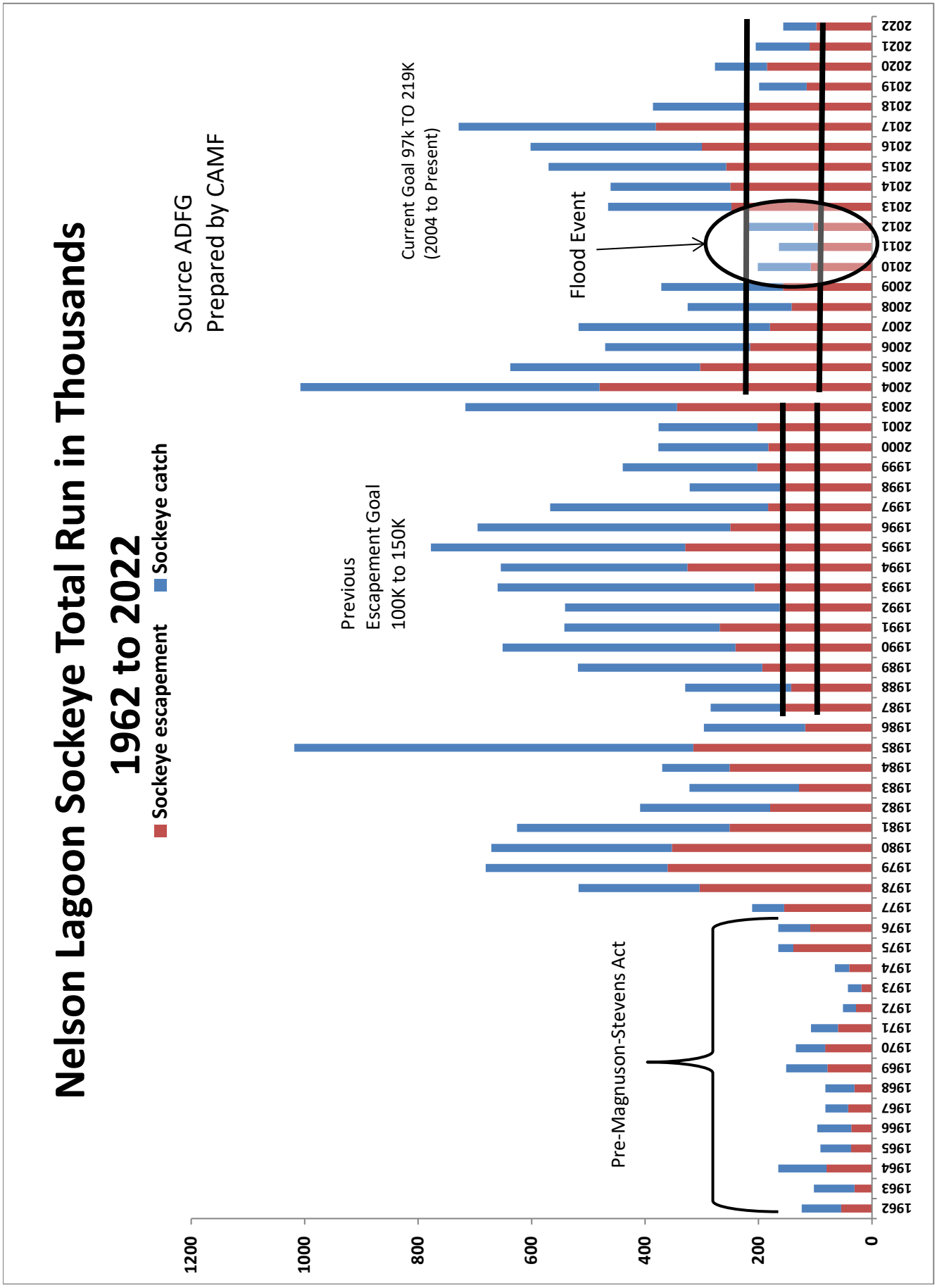
PC35

PREPARED BY TOM WOODING CAMF
SOURCE WASSIP ADFG

Figure 1b.



PREPARED BY TOM WOODING CAMF
SOURCE WASSIP ADFG


Nelson Lagoon Sockeye Total Run in Thousands
1962 to 2022
Sockeye escapement
Sockeye catch
Source ADFG
Prepared by CAMF
Current Goal 97k TO 219K
(2004 to Present)
Flood Event
Previous
Escapement Goal
100K to 150K
Pre-Magnuson-Stevens Act
1200
1000
800
600
400
200
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2022
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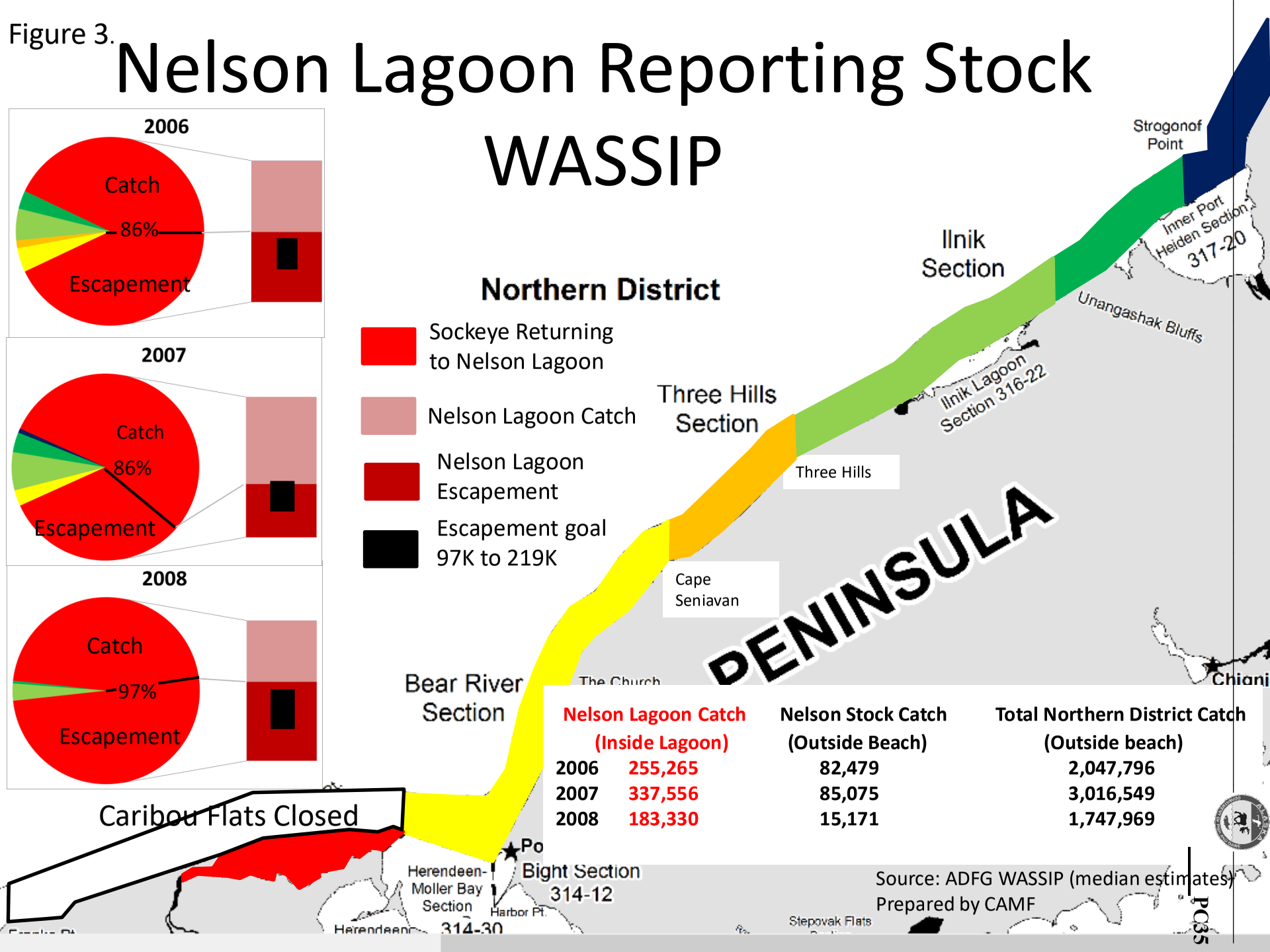
Figure 2.

Figure 3.

Nelson Lagoon Reporting Stock WASSIP

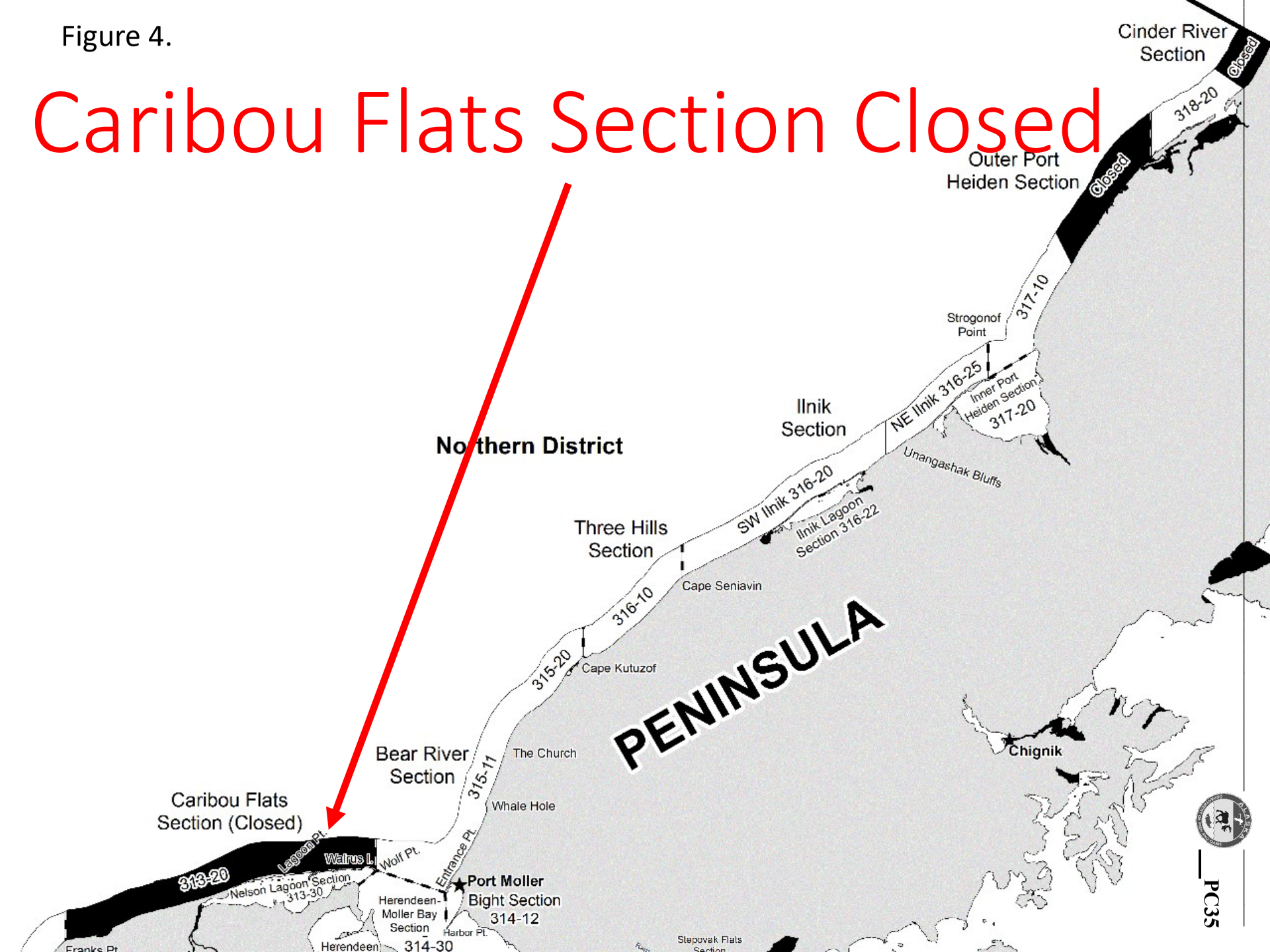


	Nelson Lagoon Catch (Inside Lagoon)	Nelson Stock Catch (Outside Beach)	Total Northern District Catch (Outside beach)
2006	255,265	82,479	2,047,796
2007	337,556	85,075	3,016,549
2008	183,330	15,171	1,747,969

Source: ADFG WASSIP (median estimates)
Prepared by CAMF

Figure 4.

Caribou Flats Section Closed



PROPOSAL 121

5 AAC 09.310. Fishing seasons.

Amend the fishing season in the Three Hills Section to increase potential fishing time and aligning sections to similar fishing periods, as follows:

Management actions that are already specified in 5 AAC 09.369 (i) for the Three Hills Section will remain the same but the earliest date that these actions can occur will begin on June 20 and not June 25.

What is the issue you would like the board to address and why? *Move the season opening date in the Three Hills Section from June 25 to June 20 to make it the same as the Ilnik and Outer Port Heiden Sections.*

PROPOSED BY: *Concerned Area M Fishermen (EF-F22-033)*

CAMF POSITION: SUPPORT

- The proposal aligns the opening date with the Ilnik Section, which borders to the northeast, and can open as early as June 20.
- The Bear River Section, which borders to the southwest, can open as early as May 1st.
- The Three Hills Section is currently managed on strength of sockeye salmon escapements in the Bear, Sandy, and Ilnik River systems before July 21.

PROPOSAL 122

5 AAC 09.310. Fishing seasons.

Amend fishing seasons to allow more commercial fishing time by allowing fishing periods in the Cinder River Section, as follows:

Open Cinder River for 36 hours from June 20 to July 31 as long as no conservation concern for sockeye salmon in the Ugashik or Cinder River systems.

What is the issue you would like the board to address and why? To allow opportunity for Area M fishermen to harvest sockeye salmon in the Cinder River Section from June 20 to July 31. Presently the section is currently closed to commercial salmon fishing in the salt water by regulation. In most years there has been surplus sockeye salmon escapement into the Cinder River above the escapement goal and current regulations do not allow effort to target these fish except inside the Lagoon which has not been logistically feasible.

PROPOSED BY: Concerned Area M Fishermen (EF-F22-034)

CAMF POSITION: SUPPORT for Area M drift and set gillnet gear only for up to 36 hours per week. Drift gillnets out to 3 miles, set gillnets out to ½ mile.

- The Cinder River system typically has one of the top four largest escapements in the North Peninsula Area and has no directed fishery for sockeye other than inside the Cinder River Lagoon which is extremely difficult to prosecute and fishermen have tried unsuccessfully to prosecute a fishery in the lagoon. The escapement in the Cinder River has exceeded its upper goal 19 of the last 20 years. (Figure 5)
- The Cinder River Reporting Stock had the lowest harvest rate (all fisheries) of any sockeye system in Bristol Bay and the North Peninsula during the WASSIP years 2006-2008. (Figure 6)
- As stated in the RC2 Staff comments "***DEPARTMENT COMMENTS:*** *The department is* ***NEUTRAL*** *on the allocative aspects of these proposals but* ***SUPPORTS*** *the adoption of additional tools to harvest sockeye salmon surplus to escapement needs."*

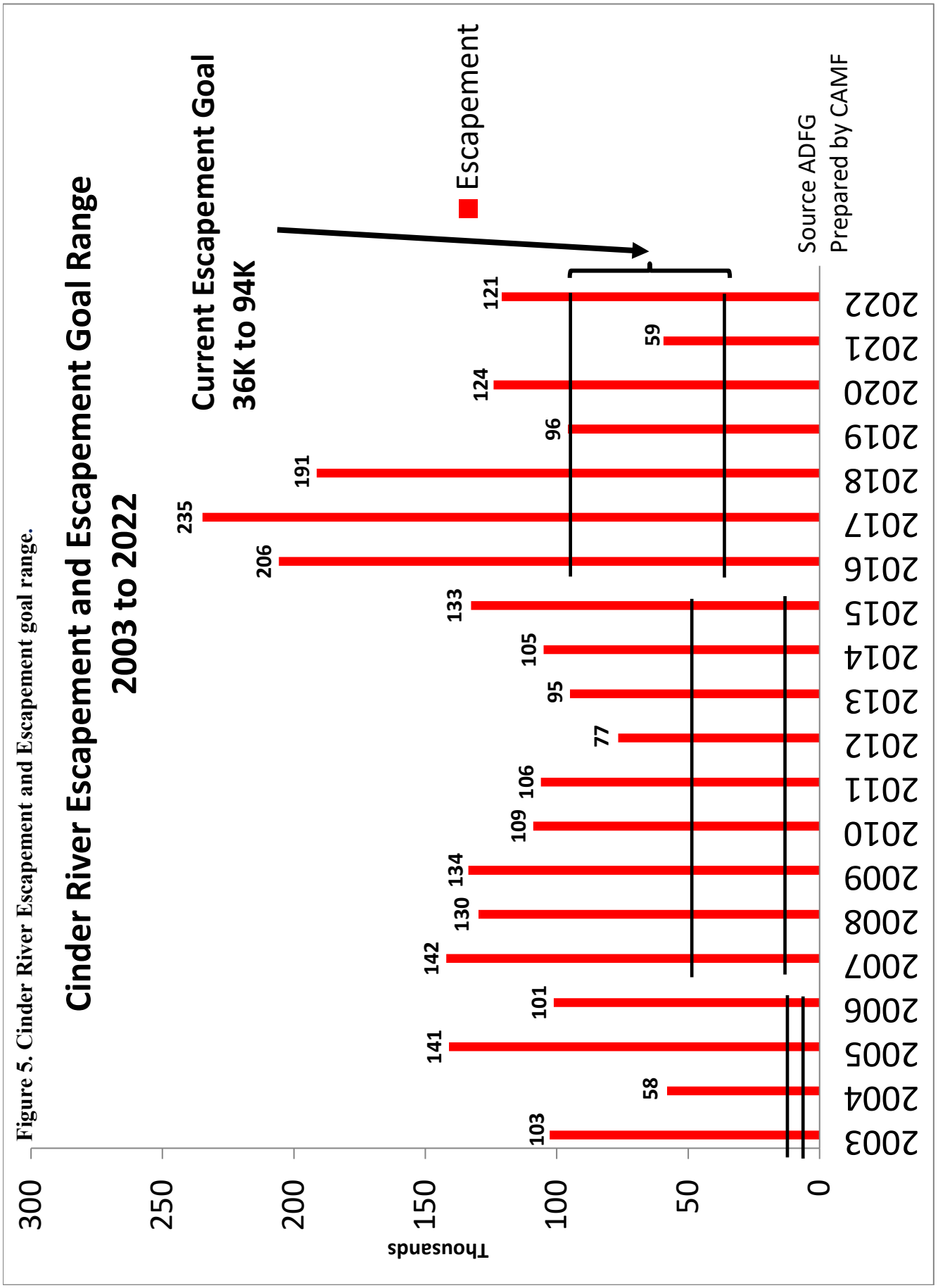
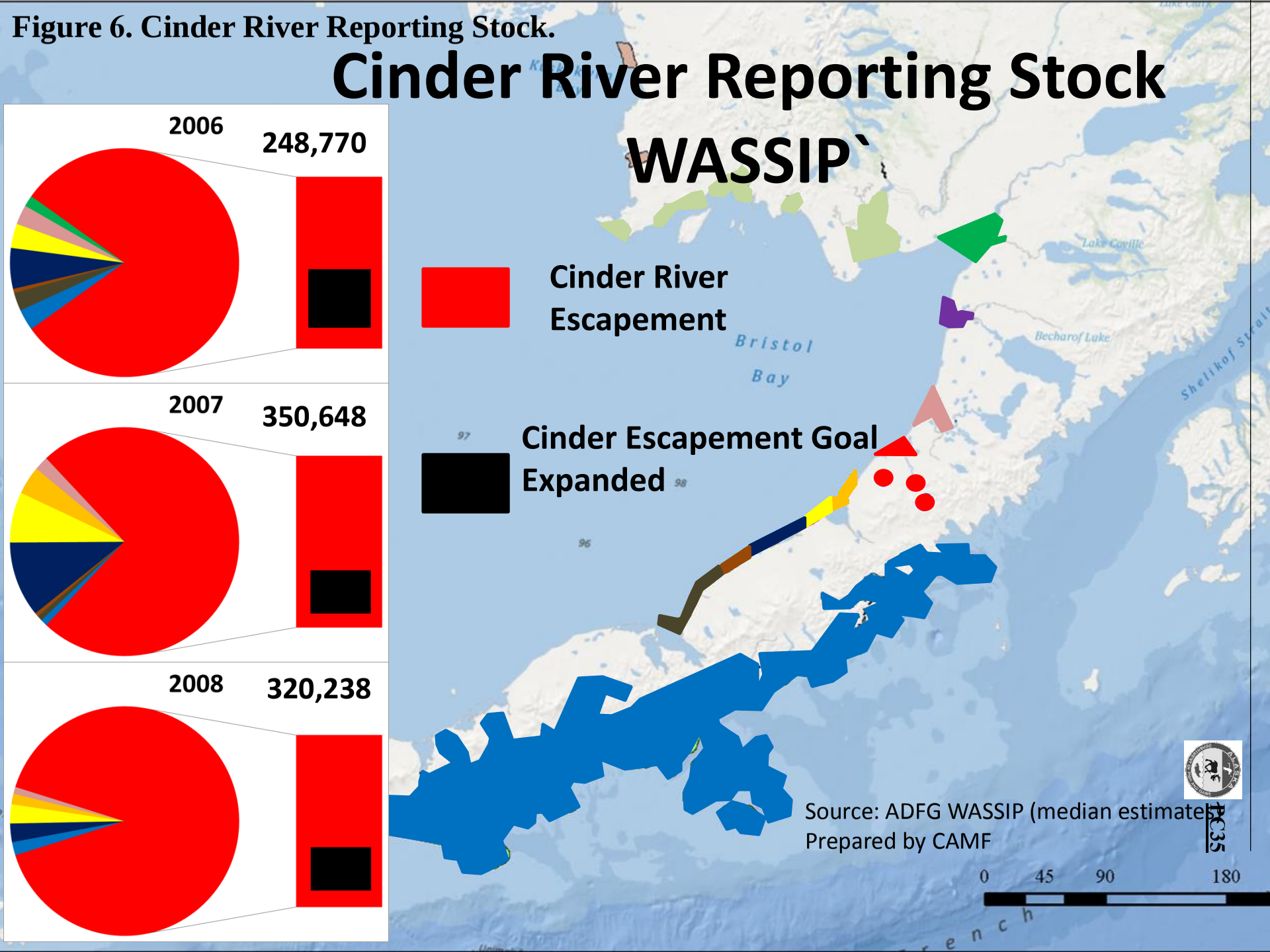


Figure 5. Cinder River Escapement and Escapement goal range.

Figure 6. Cinder River Reporting Stock.



PROPOSAL 123

5 AAC 09.310. Fishing seasons.

Amend fishing seasons to allow more fishing time and area for set net gear in the Cinder River Section, as follows:

If the outside district does open in july there could potentially be some effort to target the under utilized Cinder River sockeye run. I hope the board considers opening the Cinder River outside section on July 1st up to 1/2 mile off the beach for set net gear which is allowed for area T bristol Bay permits and area M setnet permits in the over lap salmon fishery. By current regulations the outside Cinder River section only opens after August 1st for the over lap fishery. By then the sockeye run is pretty much over. Thank you for your consideration.

What is the issue you would like the board to address and why? *Hello chairman and board of fish. My name is Dia kuzmin 3rd generation fisherman born and raised in alaska. I fished in area M on the north side for 6 seasons and the last year tried Setneting. I would like the board to consider possibly opening the Cinder River outside section up to 1/2 mile for set net fishing in july. I checked the area last season inside the Cinder River lagoon section where it's open to fish during july. The area is to shallow to fish inside the lagoon. Even at high tide it was still very shallow. I was touching bottom even at full high tide couldn't find any suitable area to set my set net. There is almost zero fishing effort in Cinder River most years. It's one of the only sockeye salmon runs in the state that the salmon run is not utilized and most years it exceeds the high end escapement goals.*

PROPOSED BY: *Dia Kuzmin (EF-F22-036)*

CAMF POSITION: **OPPOSE:** The overlap area was intended for Chinook salmon fishing in May and June and coho salmon fishing in the August and September by drift gillnet and set gillnet gear types. This proposal would only allow set gillnets. CAMF would support a directed fishery that includes set gillnets inside ½ mile and for drift gillnets out to three nautical miles for Area M permits only such as what occurs in the Ilnik Section.

PROPOSAL 124

5 AAC 09.310 (a)(1)(B). Fishing seasons – Northern District, Cinder River Section, 5 AAC 09.320. Fishing periods, and 5 AAC 09.330. Gear.

Amend fishing seasons, fishing periods and gear to allow more commercial fishing time to all Registration Area M gear types in the Cinder River Section, as follows:

Open Cinder River for 36 hours from June 20 to July 31 as long as no conservation concern for sockeye salmon in the Ugashik or Cinder River systems.

What is the issue you would like the board to address and why? *To allow opportunity for Area M fishermen to harvest sockeye salmon in the Cinder River Section from June 20 to July 31. Presently the section is currently closed to commercial salmon fishing in the salt water by regulation. In most years there has been surplus sockeye salmon escapement into the Cinder*

River above the escapement goal and current regulations do not allow effort to target these fish except inside the Lagoon which has not been logistically feasible.

PROPOSED BY: *Concerned Area M Fishermen (EF-F22-045)*

CAMF POSITION**: SUPPORT** for Area M drift and set gillnet gear only for up to 36 hours per week. Drift gillnets out to 3 miles, set gillnets out to ½ mile, also see comments on Proposal 122.

PROPOSAL 125

5 AAC 09.350. Closed waters.

Amend closed waters to change the boundary line in the Outer Port Heiden Section, as follows:

5 AAC 09.350(3)(B) East of a line from 57 05.97; 158 34.03W to 57 08.39N; 158 37.88W

We propose pivoting the existing boundary line around the midpoint of the line so that the overall area of the change is "neutral", so no overall fishing area is gained or lost. This would "swing" the inshore end of the line approximately 1/2 mile up the coast to the NE, and move the offshore end of the line 1/2 mile to the SW, in the opposite direction.

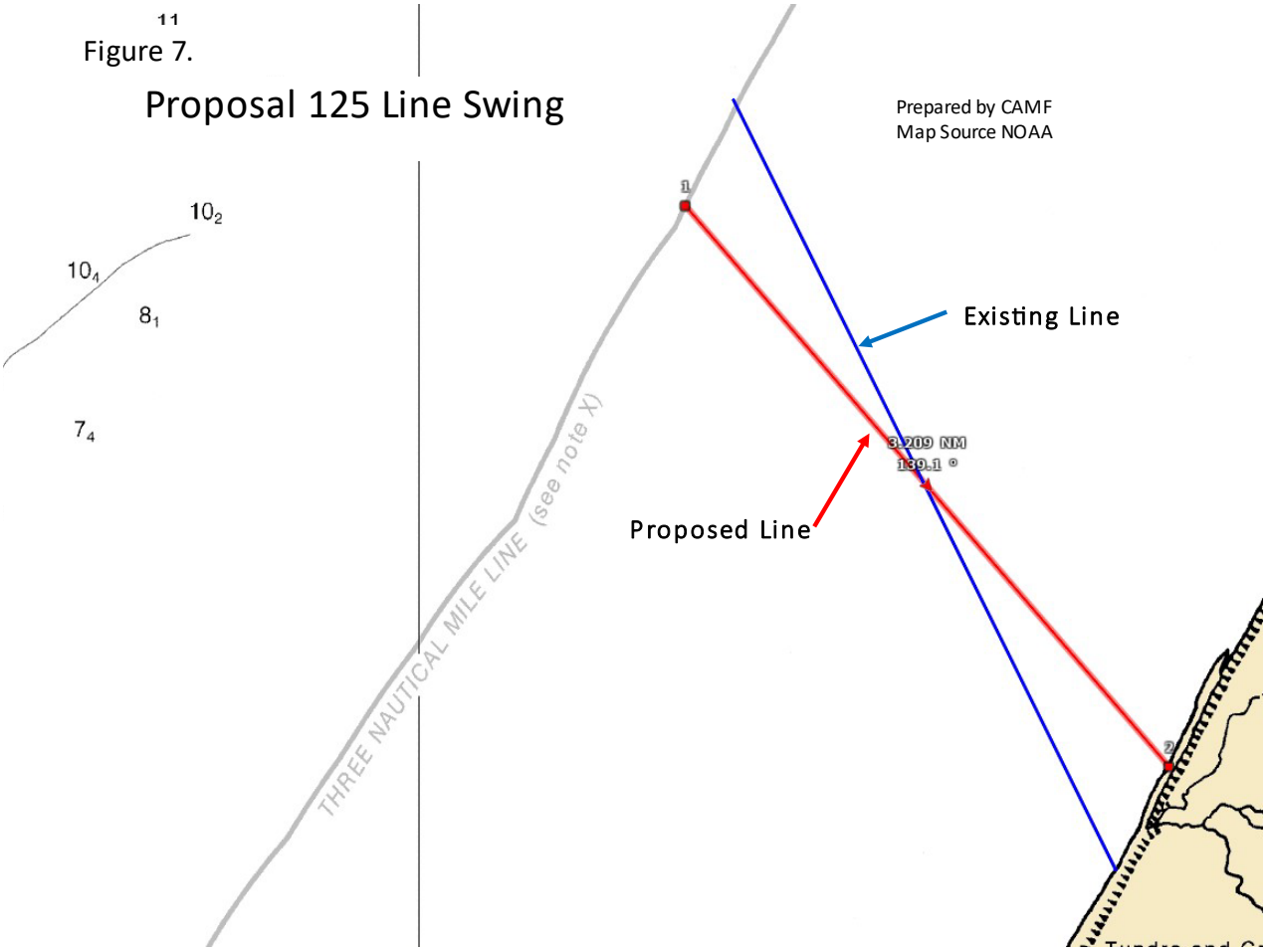
What is the issue you would like the board to address and why? *The existing line is at a fairly steep angle to the beach, and we would like to modify it slightly to make it more perpendicular to the beach, and thus make for a more orderly line fishery on the ebb tides.*

PROPOSED BY: *Concerned Area M Fishermen (EF-F22-054)*

CAMF POSITION: SUPPORT This proposal "swings" the north line of the Outer Port Heiden Section to a more perpendicular position to the beach line. The purpose for the proposal is provide a more orderly fishery on the ebb tide without any gain or loss of area in the Outer Port Heiden Section. (Figure 7)

Figure 7.

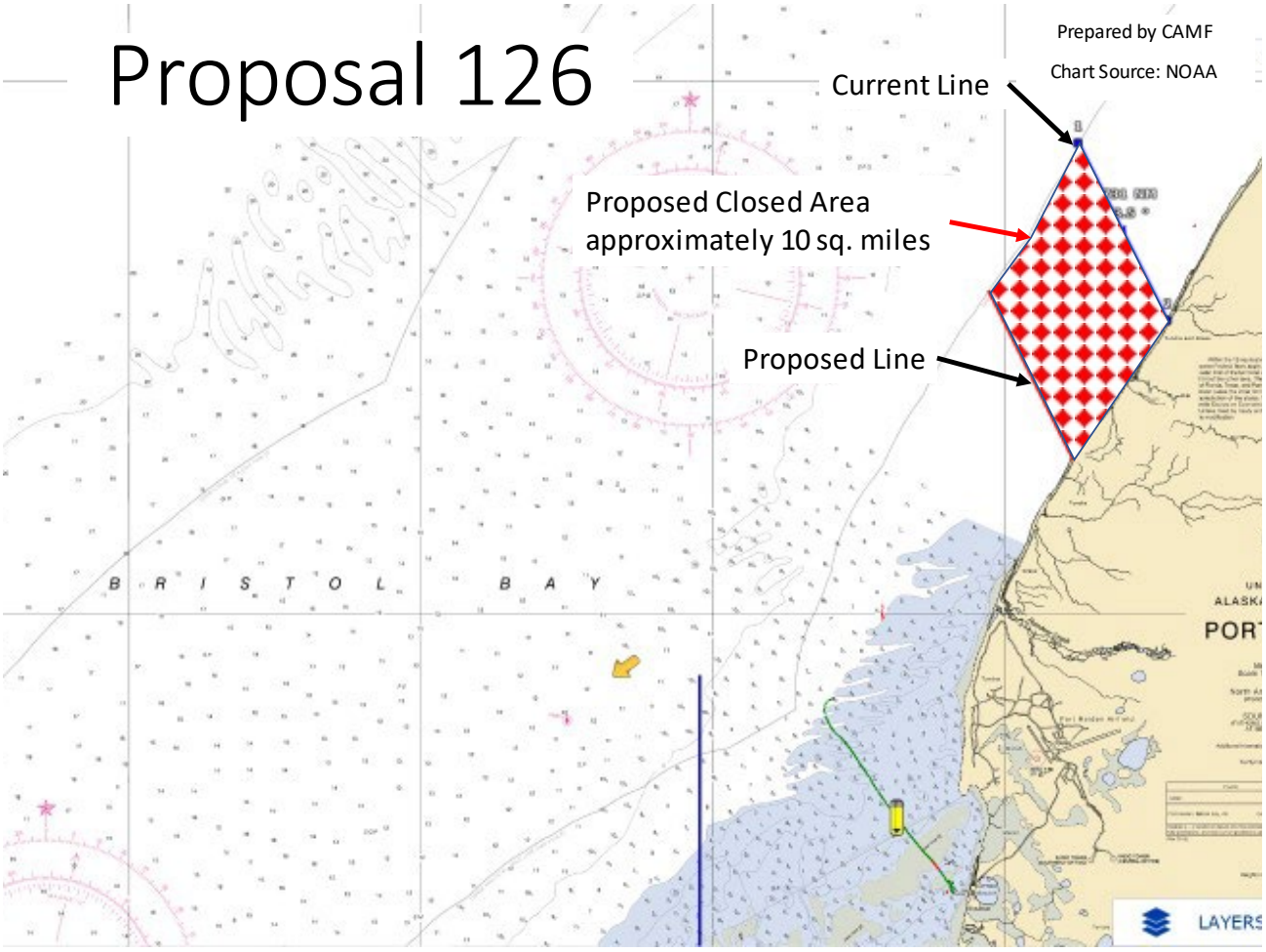
Proposal 125 Line Swing



PROPOSAL 126 *5 AAC 09.350 Closed waters and 5 AAC 09.369 Northern District Salmon Fisheries Management Plan Amend closed waters and Northern District Salmon Fisheries Management Plan to reduce commercial salmon fishing time and area in the Outer Port Heiden Section, as follows:……..*

CAMF POSITION: OPPOSE The proposal reduces the Outer Port Heiden Section by approximately 10 square miles that moves the fleet towards the shallow waters of Port Heiden Bay which causes a safety issue. The proposal will do nothing to improve quality and little or no effect on escapement into the Meshik or Ilnik River systems. (Figure 8)

Figure 8.



PROPOSAL 127 *5 AAC 09.310. Fishing seasons. Amend fishing seasons to increase fishing time in the Caribou Flats Section, as follows: (a) (9) Caribou Flats Section Only if the season ending escapement goal is met between June 20 and July 31 will the Caribou Flats Section open to drift gillnet gear.*

CAMF POSITION: OPPOSE CAMF is in favor of keeping the Caribou Flats Section closed to provide a closed area in close proximity to Nelson Lagoon during these times of low sockeye salmon abundance.

PROPOSAL 128 *5 AAC 05.331. Gillnet specifications and operations. Amend Gillnet specifications and operations to reduce commercial salmon harvest in the North Peninsula using gillnet depth reductions, as follows: Please consider reducing the max mesh depth for Area M North Peninsula from 70 meshes deep to a maximum of 45 meshes deep.*

CAMF POSITION OPPOSE: This proposal would be very costly for each fisherman that participates in the Norther District fishery. The Northern District stretches almost 300 miles and includes the Northern and Northwestern Districts. A net cost between $3,000 and $4,000 dollars for just the web and hangings, including lines and corks that cost increases to the $6,000 to $7,000 range. Almost all permit holders have more than one net which are used for backups and ones that have different mesh sizes. With a 140 active permits in the Port Moller area, the price to the fleet could exceed 2 million dollars. Before 1991 there was no mesh depth restriction and then after 1991 a 70-mesh depth restriction was implemented. At no time was there a 45-mesh restriction.

PROPOSAL 129 5 AAC 09.331. Gillnet specifications and operations.

Allow use of monofilament gillnet web in the Northern District, as follows:

Notwithstanding 5 AA C 39.250 (C) In the Northern District single filament gill net web may be used by set net gear.

What is the issue you would like the board to address and why? *With recent ocean temperature changes, algae has been more prevalent and is stuck easily in knots of monofilament gill net web. Other areas have adopted monofilament gear combat algae and other vegetative debris and allowing the use of monofilament will give a option as a solution to this problem.*

PROPOSED BY: *Connor Murphy (EF-F22-024)*

CAMF POSITION: SUPPORT CAMF supports the use of monofilament for use with set net gear for the reasons stated in the proposal and does not support the use for drift gillnet gear.

PC35

CONCERNED AREA M FISHERMEN

35717 Walkabout Road, Homer, Alaska 99603
(907) 235-2631

Marit Carlson-Van Dort, Chairwoman
Alaska Board of Fisheries
P.O. Box 25526
Juneau, Alaska 99802-5526

February 6, 2023

Re: Alaska Peninsula Proposals

Dear Ms. Van-Dort and Board Members:

Concerned Area M Fishermen (CAMF) submit these comments on proposals you will be considering at the upcoming meeting concerning fisheries of the Alaska Peninsula, also known as Area M. CAMF represents the interests of drift gillnet fishermen who fish in Area M. Our membership includes approximately 85% of the permit holders active in the fishery.

CAMF members participate in the drift gillnet fishery on the North Alaska Peninsula, which is managed under the provisions of the Northern District Salmon Fisheries Management Plan, 5 AAC 09.369, and the fisheries along the South Peninsula, including the South Unimak and Shumagin Islands June Salmon Fishery (the June Fishery), 5 AAC 09.365, and the Post-June Fishery, 5 AAC 09.366. CAMF has been active in the Board process for over 35 years, contributing to the development of these management plans, and we look forward to working with you again this year.

These comments are in two separate PC's. The first part will review the South Peninsula June fishery, including the history and importance of the fishery and prior Board actions and findings. We will also state CAMF's position on specific South Peninsula proposals. Secondly, we provide an overview of the North Peninsula fishery, including a discussion of prior Board actions, WASSIP results, some history of the fishery, the management structure, and the importance to the economy of the region. Here, too, we will outline our position on some specific proposals.

Thank you for taking the time to review these comments. We welcome the opportunity to discuss with you the particulars of the drift gillnet fisheries in which our members participate, and to answer any questions you may have regarding our position on specific proposals.

Sincerely,

Steve Brown, President
Concerned Area M Fishermen (CAMF)
35717 Walkabout Rd.
Homer, AK 99603

Proposal Number	CAMF Position	Description
		South Alaska Peninsula Southeast District Mainland Salmon (3 proposals)
130	**S**	Amend the *Southeastern District Mainland Salmon Management Plan* to allow more fishing time in the Northwest Stepovak Section as follows
131	**S**	Amend the *Southeastern District Mainland Salmon Management Plan* to allow commercial salmon fishing with set gillnet gear, and after July 11, purse seine gear concurrent to open commercial fishing periods for salmon in the Chignik Management Area, as follows
132	**N**	Amend the *Southeastern District Mainland Salmon Management Plan* to reflect changes to Chignik River sockeye salmon escapement goals
		South Alaska Peninsula Salmon June Management Plan (10 proposals)
133	**O**	Amend the *South Unimak and Shumagin Islands June Salmon Management Plan* to reduce commercial salmon fishing time and area for purse seine gear, as follows
134	**O**	Amend the *South Unimak and Shumagin Islands June Salmon Management Plan*, as follows
135	**O**	Amend the *South Unimak and Shumigan Islands Management* Plan to reduce commercial salmon fishing time in the Shumagin Islands Section, as follows
136	**O**	Amend the *South Unimak and Shumagin Islands June Salmon Management Plan* to implement a chum salmon harvest cap to reduce commercial fishing time, as follows
137	**O**	Amend the *South Unimak and Shumagin Islands June Salmon Management Plan* to reduce commercial salmon fishing time, as follows
138	**O**	Amend the *South Unimak and Shumagin Islands June Salmon Management Plan* to require the department to place observers onboard commercial salmon fishing vessels, as follows
139	**O**	Amend the *South Unimak and Shumagin Islands June Salmon Management Plan* to restrict commercial salmon fishing time, as follows
140	**O**	Amend the *South Unimak and Shumagin Islands June Salmon Management Plan* to reduce commercial salmon fishing time, as follows
141	**O**	Amend the *South Unimak and Shumagin Islands June Salmon Management Plan* to require the department to manage the June fishery by emergency order to close those areas within the management plan. Amend **5 AAC 09.330. Gear**. to allow other gear types to be used in the commercial fishery, as follows
142	**O**	Amend *South Unimak and Shumagin Islands June Salmon Management Plan* and *Post-June Salmon Management Plan* to allow more fishing time for set gillnet gear only, as follows
		South Alaska Peninsula Post-June Salmon Management Plan (5 proposals)
143	**O**	Amend the *Post-June Salmon Management Plan for the South Alaska Peninsula* to close the set gillnet fishery in response to department immature salmon assessment, as follows
144	**S**	Amend the *Post-June Management Plan for the South Alaska Peninsula* to allow for fishing periods starting August 1 in the Southeastern and South Central Districts, as follows

Note: S = Support; SA = Support with Amendment; N = Neutral; O = Oppose

Proposal Number	CAMF Position	Description
146	**S**	Amend the *Post-June Salmon Management for the South Alaska Peninsula* to increase commercial salmon fishing periods, as follows
147	**N**	Amend the *Post-June Salmon Management for the South Alaska Peninsula* to increase commercial salmon fishing periods for set gillnet gear, as follows
		South Alaskan Peninsula Salmon Management (2 proposals)
148	**O**	Amend a suite of management plans to reduce commercial fishing time in the South Alaska Peninsula area, as follows
149	**O**	Amend management plans for the South Alaska Peninsula area to reduce commercial fishing time, as follows
		Alaska Peninsula Salmon Gear, Closed Waters, and Description of Districts and Sections (3 proposals)
150	**O**	Amend districts and sections, *Southeastern District Mainland Salmon Management Plan* and *South Unimak and Shumagin Islands June Salmon Management Plan* by including the Volcano Bay Section of the Southwestern District into the South Central District, as follows
151	**N**	Amend gillnet specifications and operations to allow offshore anchoring of the up to 25 fathom seine web lead, as follows
152	**S**	Amend the closed water boundary in Stepovak Bay to increase commercial fishing area in the Stepovak Flats Section, as follows
		Chignik Area Salmon Management (15 proposals)
105	**N**	Amend the *Chignik Area Salmon Management Plan* to reflect changes to Chignik River sockeye salmon escapement goals
106	**O**	Amend the *Chignik Area Salmon Management Plan* to increase inriver escapement of sockeye salmon prior to opening a commercial fishery by emergency order, as follows
107	**S**	Modify the *Chignik Area Salmon Management Plan* to allow more commercial fishing time by opening commercial salmon fishing periods regardless of sockeye salmon escapement, as follows
108	**S**	Amend the *Chignik Area Salmon Management Plan* to implement commercial salmon fishing periods in June, as follows
109	**O**	Amend the *Chignik Area Management Plan* to allow period openings to harvest more salmon in the Central District and repeal the inriver run goal in August and September, as follows
110	**S**	Amend the *Chignik Area Salmon Management Plan* to restrict commercial fishing periods in Chignik Lagoon until the escapement goal has been met, as follows
111	**N**	Amend the *Chignik Area Salmon Management Plan* to increase commercial salmon fishing time and area in the Eastern District in August, as follows
112	**S**	Amend the *Chignik Area Salmon Management Plan* to include a harvest cap in the Eastern District to reduce commercial salmon fishing time, as follows
113	**N**	Amend the *Chignik Area Salmon Management Plan* to allow post-June commercial salmon fishing periods, as follows

Note: S = Support; SA = Support with Amendment; N = Neutral; O = Oppose

Proposal Number	**CAMF Position**	**Description**
115	**S**	Amend the *Chignik Area Salmon Management Plan* so that pink, chum and coho salmon stocks in the Western and Perryville Sections of Registration Area L will be managed based on the strength of the pink, chum, and coho salmon stocks in the Stepovak and Shumagin Islands Sections of Registration Area M
116	**S**	Modify the *Chignik Area Salmon Management Plan* to manage the Western and Perryville Districts of Registration Area L based on the strength of the pink, chum, and coho salmon stocks in the Southeast District Mainland (SEDM) Section of Registration Area M, as follows
117	**N**	Amend the fishing districts, sections, and subsections to increase fishing time and area by creating new sections in outside waters of the Chignik Management Area, as follows
118	**N**	Amend the districts, sections and subsections and the management plan to increase commercial fishing time and area in the Western and Perryville Districts in August, as follows
119	**O**	Amend allowable gear in the Chignik Management Area to include troll gear, create a management plan to include a commercial troll fishery and amend regulations in **Chapter 29 Salmon Troll Fishery** to include the Chignik Management Area

Note: S = Support; SA = Support with Amendment; N = Neutral; O = Oppose

The June Fishery

Salmon have been harvested at South Unimak and in the Shumagin Islands during the month of June for over a century. There's a reason for this: the sockeye we catch are in prime condition and of the highest quality, bringing top dollar in the market. The June fishery is very valuable to its participants, to the Alaska Peninsula economy, and to the State, and deserves to be managed in a manner that recognizes and enhances its economic and social importance. This is especially critical in this time of competition with farmed salmon and as Alaska seeks to generate greater revenues from its natural resources. Past Boards have understood the value of the June fishery and have been committed to assuring us a viable sockeye harvest.

In 2004, the Board adopted significant changes to the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365. These revisions simplified the management approach, ending a two-decade long experiment of imposing increasingly complex and untested regulations aimed at constraining our harvest of migrating salmon, especially chum salmon. That experiment culminated in 2001 with the adoption of a management plan that drastically cut our fishing time and severely impaired the area managers' ability to maintain a reasonable sockeye harvest. The Board in 2004 recognized multiple problems with the prior plans – not the least of which is that the various limits imposed on the June fishery over time had no effect on the fisheries intended to benefit from such limits – and opted instead for a straightforward management regime of scheduled openings that give us enough time on the water to sustain a reasonable harvest while providing a balance of closed periods. We encourage Board members to review the findings prepared by the Board in 2004 (2004-229-FB).

In adopting these changes to the June fishery management plan, the key question the Board asked was whether the fishery would still perform within historical levels of harvest. The Department answered yes. Experience under the 2004 plan confirms that the Department was correct. The harvest of sockeye in the June fishery has ranged from roughly 3.9 million fish in 2022 to 660,000 in 2014, averaging 1,346,000 for the period 2012-2021.[1] During the same time, the harvest of chum ranged from approximately 179,000 chum salmon in 2015 to 1,168,600 in 2021 and has averaged around 502,000 fish for that period. The chum harvest in 2022 was 540,000.

Area M fishermen well understand the need to limit their harvest of chum salmon and have taken several steps toward this end. For instance, the commercial fleet (all gear types) participates in "chum harvest pools" where all chum we catch are pooled then divided equally among the fleet. This eliminates any incentive for an individual to target chum. In addition, the fleet has voluntarily stood down and not fished when there has been an abundance of chums present. In 2022, the seine fleet further adopted a voluntary "hot spot" stand down program whereby fishermen quit fishing in certain times and areas if local chum harvest was determined to be too high. This program had 100% participation by the seine fleet, and the harvest of chum in 2022 was cut in half relative to 2021. But it must also be recognized that occasionally there will be years when the presence of chum in Area M waters--particularly considering the dramatic

[1] *See* South Alaska Peninsula Annual Management Report, 2022, Fisheries Management Report No.22-23 (December 2022), at 71, Appendix B5.

increase in Asian chum hatchery production--that they will be hard to avoid. At some point, vessels will need to fish if they are to maintain a reasonable sockeye harvest. It is also important to dispel the notion advanced by some that the chum harvest in the June fishery should only be considered as "by-catch" to our harvest of sockeye. Chum salmon have been harvested in the June fishery as long as it has existed and constitute an important economic component of the fishery.

Detractors of the June fishery have long asserted that the mixed stock nature of the fishery risks adverse biological impacts. We disagree. Based on several studies of the June fishery – including tagging; genetic stock identification (GSI), including Western Alaska Salmon Stock Identification Program (WASSIP), the 2022 GSI for chum in Area M; and mark-recapture data – certain conclusions have become clear:

1. Bristol Bay sockeye stocks in the fishery are highly mixed, and there is no risk that we will tap into a vein of fish from one river and have a disproportionate impact on a single stock.

2. The chum salmon harvested in our fishery originate from a wide geographic area – Japan, Russia, the AYK, Bristol Bay, the Alaska Peninsula, South-central Alaska, Canada, and the Pacific Northwest.

3. WASSIP results showed that the harvest levels of the June Fishery were smaller than the **error** in estimates of the size of the Bristol Bay sockeye and AYK chum runs.

4. Yukon fall chum, whose declines in the mid-1980s were cited as the basis for imposing the first chum cap, are present in very small numbers in the June fishery; and

5. Only a fraction of any migrating runs pass through the area of the June fishery, with the rest returning through Aleutian passes to the west. An international tagging study immediately west of the fishery shows that AYK chum runs pass through Aleutian Island passes with similar run timing.

In sum, the June fishery has little biological impact on the salmon runs migrating through the South Peninsula area and there is no conservation risk from permitting a viable fishery to be prosecuted there. Proposals seeking to further restrict the Area M fisheries are based on the belief that there is, or should be, a priority allocation for stakeholders closer to the stream of origin of salmon stocks. This attitude is in direct conflict with the position of the State of Alaska as signatory of the Pacific Salmon Treaty, which recognizes the intrinsic equity claim for fisheries near waters where salmon grow to maturity. The State vigorously maintains that there is at least as much, if not more right to harvest based on the idea of contributions to growth in contrast to stream of origin. Within Alaska salmon are a common property resource that 'belong' to everyone, not just those nearest the stream of origin. The current June fishery management plan is working well, and data from WASSIP confirm the basis for prior Board actions and findings. CAMF was one of the eleven signatories of the original Memorandum of Understanding for WASSIP and was a participant and contributor throughout the nine-year study.

South Alaska Peninsula Salmon June Management Plan (10 proposals)

PROPOSAL 133 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. *Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time and area for purse seine gear, as follows: Amend fishing time in the Shumagin Islands for seiners to 72 hour openings interspersed with 72 hour closures. Remove the Volcano Bay Section and the East and West Pavlof Bay Sections from the June Management Plan.*

PROPOSED BY: Timothy Murphy

CAMF POSITION: OPPOSED

PROPOSAL 134 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. *Amend the South Unimak and Shumagin Islands June Salmon Management Plan, as follows: Repeal 5 AAC 09.365 and replace with the previous management plan adopted by the BOF approximately 20 years ago but edited to incorporate Chinook salmon and coho salmon in addition to chum and sockeye salmon.*

PROPOSED BY: Kuskokwim River Inter-Tribal Fish Commission

CAMF POSITION: OPPOSED see comments on Proposal 140.

PROPOSAL 135 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. *Amend the South Unimak and Shumigan Islands Management Plan to reduce commercial salmon fishing time in the Shumagin Islands Section, as follows: … (X) The ADF&G will maintain a sockeye catch ratio approaching South Unimak at 82% and Shumagin Islands at 18%. If Shumagin Island Section fishery achieves 18% of the June Salmon Management Plan catch based on daily reports, the ADF&G shall shutdown this section until fish ticket reports total less than 18%. …*

PROPOSED BY: Ben and Raechel Allen

CAMF POSITION: OPPOSED

PROPOSAL 136 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. *Amend the South Unimak and Shumagin Islands June Salmon Management Plan to implement a chum salmon harvest cap to reduce commercial fishing time, as follows: ONC proposes that the Board of Fisheries amend the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365, to incorporate a harvest cap during the June fisheries using all gear types. More specifically, set a cap of 280,000 chum salmon and close the commercial fishery for the remainder of June once that cap is met.*

PROPOSED BY: Orutsararmiut Traditional Native Council

CAMF POSITION: OPPOSED also see comments on Proposal 140.

- A chum cap was imposed in the June Fishery from 1986 to 2000. It ranged from 350,000 to 700,000 fish.

- If this cap had been implemented in the past, 16 of the last 19 seasons would have been closed prematurely.

PROPOSAL 137 5 AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan. *Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time, as follows:*

PROPOSED BY: Orutsararmiut Traditional Native Council

CAMF POSITION: OPPOSED

- This proposal would reduce the time for set gillnet gear from 416 hours to 100 hours. Drift gillnet gear and seine gear would be reduced from 352 hours to 100 hours.
- This proposal would limit the ability of the fleet to use chum avoidance methods to maximize sockeye harvest while minimizing chum harvests.

PROPOSAL 138 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. *Amend the South Unimak and Shumagin Islands June Salmon Management Plan to require the department to place observers onboard commercial salmon fishing vessels, as follows:*

PROPOSED BY: Orutsararmiut Traditional Native Council

CAMF POSITION: OPPOSED

- A drift fishing vessel is the South Peninsula June fishery ranges from 30 to 50 feet in length and has limited ability to add additional people. Currently most vessels have one or two crewman besides the permit holder on board. In numerous cases it would be physically impossible or against USCG requirements to accommodate additional crew.

PROPOSAL 139 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. *Amend the South Unimak and Shumagin Islands June Salmon Management Plan to restrict commercial salmon fishing time, as follows:*

PROPOSED BY: Tribal Resources Stewardship Program, Tanana Chiefs Conference

CAMF POSITION: OPPOSED

PROPOSAL 140 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. *Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time, as follows:*

Repeal the current South Unimak and Shumagin Islands June Salmon Management Plan and readopt an amended version of the management plan in place from 2001-2003, as follows:

Erase all of the current 5 AAC 09.365 and replace with the following, edited language from the 2001-2003 plan;

PROPOSED BY: Fairbanks Advisory Committee Fisheries Sub-Committee

CAMF POSITION: OPPOSED

If adopted, Proposal #140 would return the June South Unimak Shumagin Island (SUSI) fishery to the regulations that existed from 2001 to 2003. These regulations were the most restrictive regulations in the history of the June fishery. The 2001 change was ostensibly passed to conserve chum salmon in distant AYK rivers, yet there is little evidence it accomplished that. In 2001, there was a dispute over salmon prices Statewide, and therefore very little fishing occurred in June. Only 48,350 chums were caught in the Area M June fishery, yet the Kuskokwim and Yukon still experienced extremely low escapements. Similarly, in 2002 and 2003, those rivers also experienced modest returns, even though the fleet fished under the same schedule proposed in Proposal #140.

Due to the limited fishing allowed under the 2001 management plan—three 16hr fishing periods in any 7-day period—the fleet largely quit moving geographically to avoid chums, nor did the seine fleet stand-down if chum abundance was too high. There was just not enough opportunity under the 2001 plan to forego already limited fishing time and chum harvests didn't drop as much as the plan proponents suggested. (Figure 1) However, the 2001 management plan had a significant impact not only on the Area fishing fleet but also to the communities of the Aleutian East Borough that rely on the fishery as a tax base. The fishing fleet dropped by 37% from 2001-2003 to a low of 204 total permits by 2004. The Aleutian East Borough experienced its lowest revenues from salmon landing taxes since it was formed in 1980 due partially to the low sockeye harvests in the June Fishery. (Figure 2)

For these reasons, the Board in 2004 found that it was appropriate to establish a simple open-closed fishing schedule for the June fishery that we have fished under, with minor changes, for almost 20 years. Indeed, by 2004 the chum returns to western Alaska were at average or above average levels for the next 16 years, until 2020 when the latest down cycle started. The Yukon summer chum escapement of 3.8 million in 2006 was the highest in 30 years. There seems little correlation between the chum harvest in the SUSI June fishery and escapements into the western Alaska river systems later in the summer.

Recent results of the genetic sampling done in 2022 of chums caught in the June SUSI fishery shows 96,116 Central Western Alaska (CWAK) summer chums were harvested out of a total June catch of 544,000. It is important to note that this stock grouping includes chums bound for Bristol Bay, the Kuskokwim and Yukon Rivers, as well as chum systems in Norton Sound. It is reasonable to assume that a significant portion of these CWAK chums harvested in the June fishery are bound for river systems in Bristol Bay. The percentage of June fishery harvest represented by the CWAK stock grouping was significantly lower than found in the Western Alaska Salmon Stock Identification Program (WASSIP) study and the presence of Asian origin chums in the fishery was significantly higher. (Figure 3) Although ADF&G has not yet released its harvest rate analysis for last year's sampling, it is unlikely that the low harvest rates shown in the WASSIP study will be found to be greatly different from what was observed in the June fishery in 2022. It is also important to note that this study further confirms previous studies that there is a very low incidence of Upper Yukon fall chum (approximately 1,300 total harvest) present in the fishery. (Figures 4, 5, 6, 7)

Nevertheless, the Area M stakeholders have recognized the need to cut chum harvests from the high harvest levels seen in 2021. Processors have long implemented mandatory chum

pools so there is no individual incentive to target chums relative to sockeye. In 2022, the seine fleet instituted a voluntary "hot spot" reporting and stand-down system that had 100% fleet support. The seine fleet gave up several days, and quit early on others, to avoid chum harvest. The fleet was successful in cutting the chum harvest by 50% relative to 2021. The seine fleet plans to fine tune and improve upon this for 2023 if given the chance. The gillnet fleet continues to move geographically within the district to avoid areas of greater chum abundance. As we found in 2001-2003, these efforts would be difficult to continue to implement with dramatic cuts in fishing time proposed under Proposal 140.

Chums and Sockeye have similar migration patterns in the Pacific Ocean and Bering Sea. Maturing salmon return through all the Aleutian passes into the Bering Sea not just Unimak Pass. The SUSI June fishery has low harvest rates on Bristol Bay and Western Alaska salmon stocks mainly because the area the fishery takes place is small compared to the large size of the Pacific and Bering Sea. (Figures 8, 9)

PROPOSAL 141 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. 5 AAC 09.330. Gear. *Amend the South Unimak and Shumagin Islands June Salmon Management Plan to require the department to manage the June fishery by emergency order to close those areas within the management plan. Amend* ***5 AAC 09.330. Gear****. to allow other gear types to be used in the commercial fishery, as follows.*

PROPOSED BY: John H. Lamont Jr.

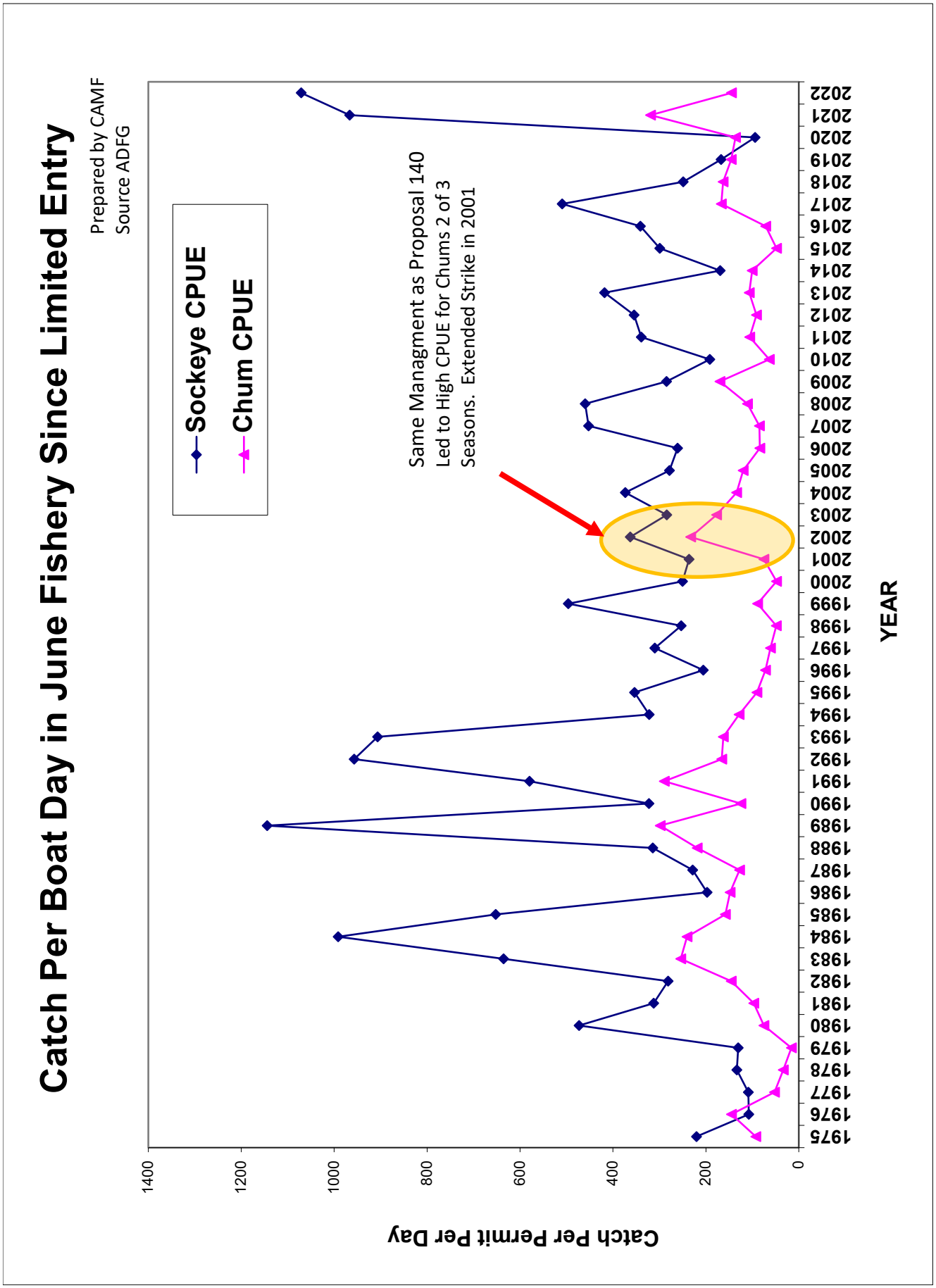
CAMF POSITION: OPPOSED

PROPOSAL 142 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan and 5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula. *Amend South Unimak and Shumagin Islands June Salmon Management Plan and Post-June Salmon Management Plan to allow more fishing time for set gillnet gear only, as follows:*

PROPOSED BY: Jim Smith

CAMF POSITION: NUETRAL

Figure 1.


Catch Per Boat Day in June Fishery Since Limited Entry
Prepared by CAMF
Source ADFG
Sockeye CPUE
Chum CPUE
Same Managment as Proposal 140
Led to High CPUE for Chums 2 of 3
Seasons. Extended Strike in 2001
Catch Per Permit Per Day
YEAR
0
200
400
600
800
1000
1200
1400
1975
1976
1977
1978
1979
1980
1981
1982
1983
1984
1985
1986
1987
1988
1989
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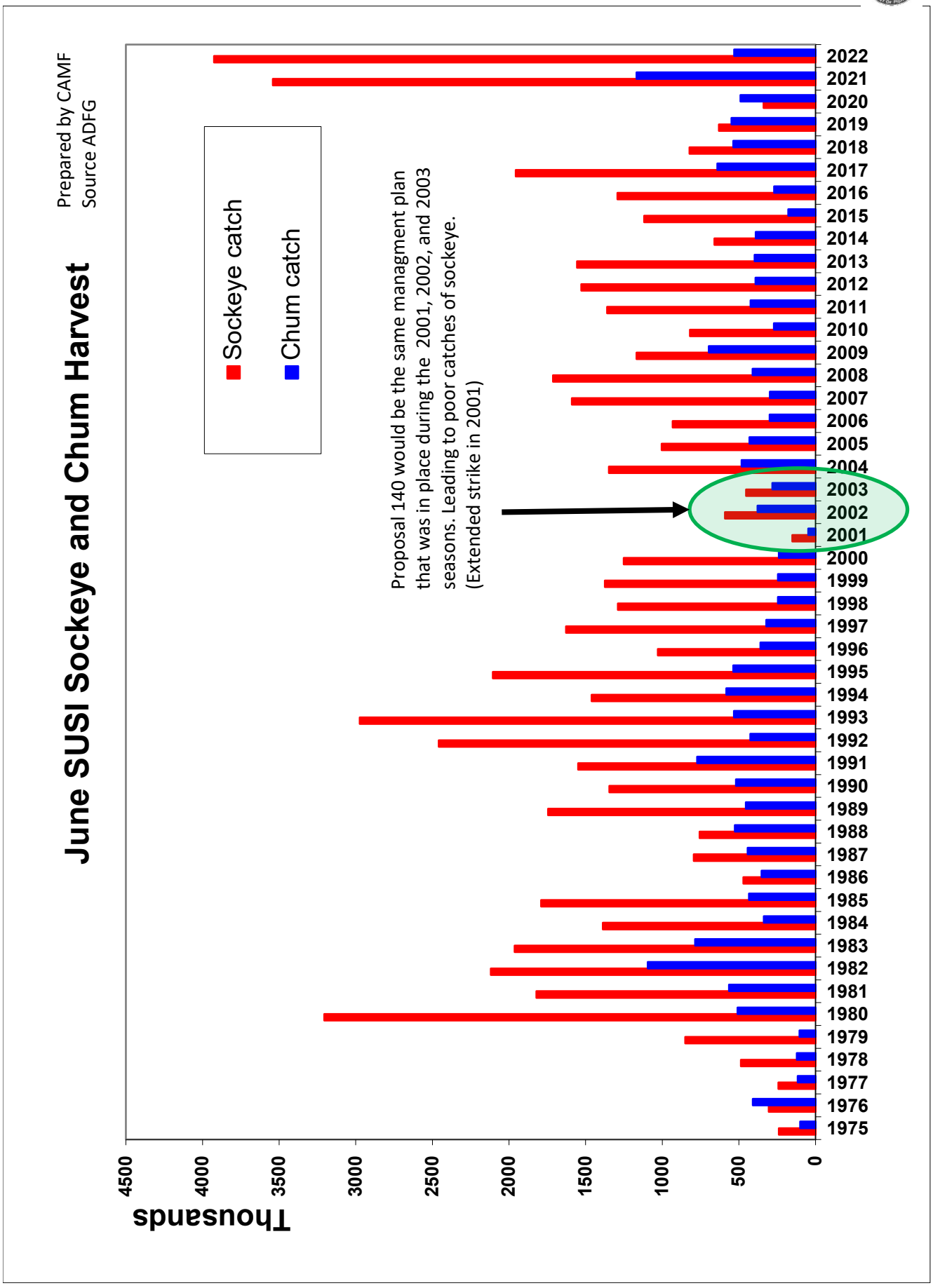
2021
2022


June SUSI Sockeye and Chum Harvest
Prepared by CAMF
Source ADFG
Sockeye catch
Chum catch
Proposal 140 would be the same managment plan that was in place during the 2001, 2002, and 2003 seasons. Leading to poor catches of sockeye. (Extended strike in 2001)
Thousands
4500
4000
3500
3000
2500
2000
1500
1000
500
0
2022
2021
2020
2019
2018
2017
2016
2015
2014
2013
2012
2011
2010
2009
2008
2007
2006
2005
2004
2003
2002
2001
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1990
1989
1988
1987
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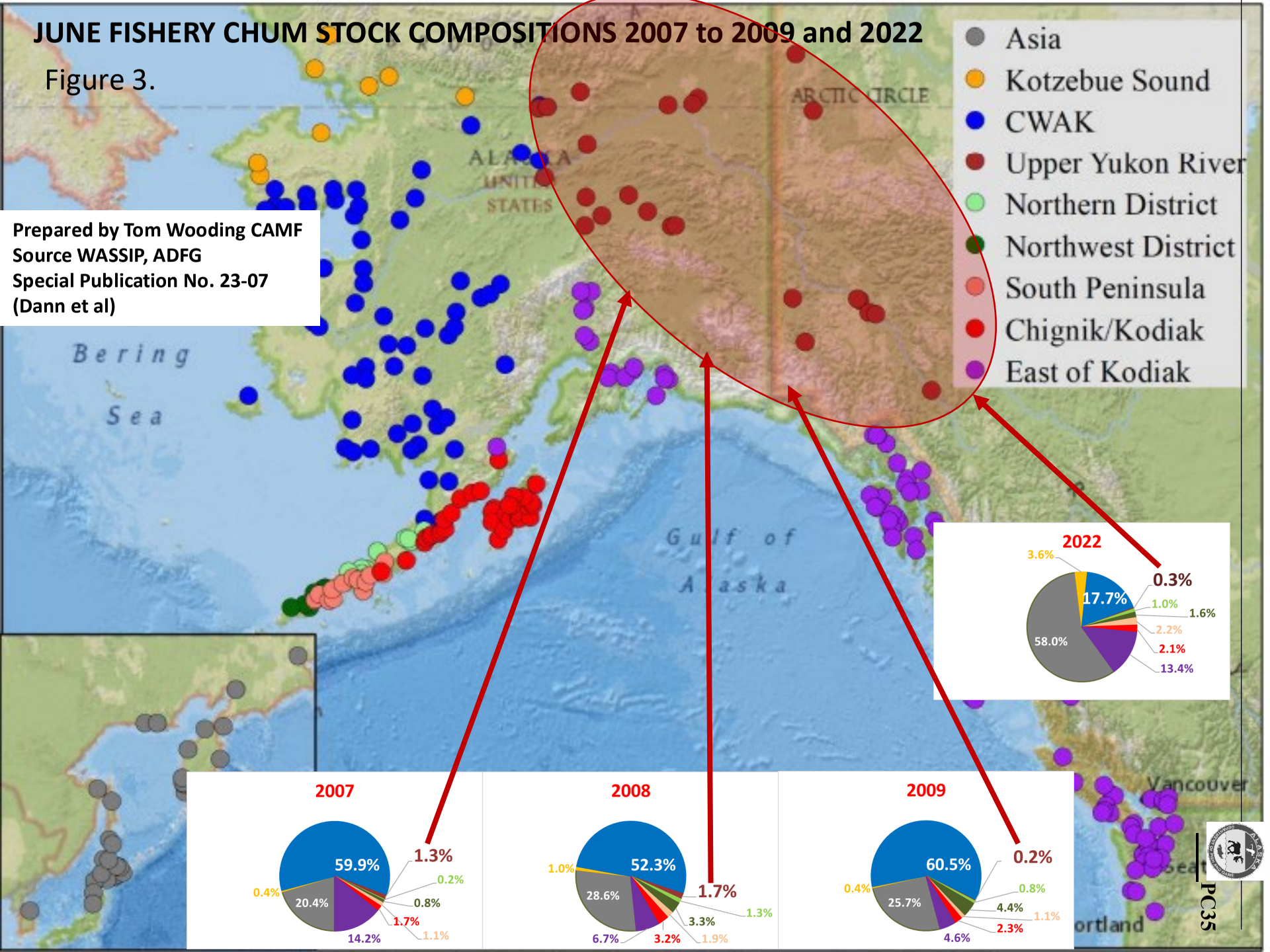
1976
1975

Figure 2.

JUNE FISHERY CHUM STOCK COMPOSITIONS 2007 to 2009 and 2022

Figure 3.



WASSIP CHUM HARVEST RATES

Figure 4.

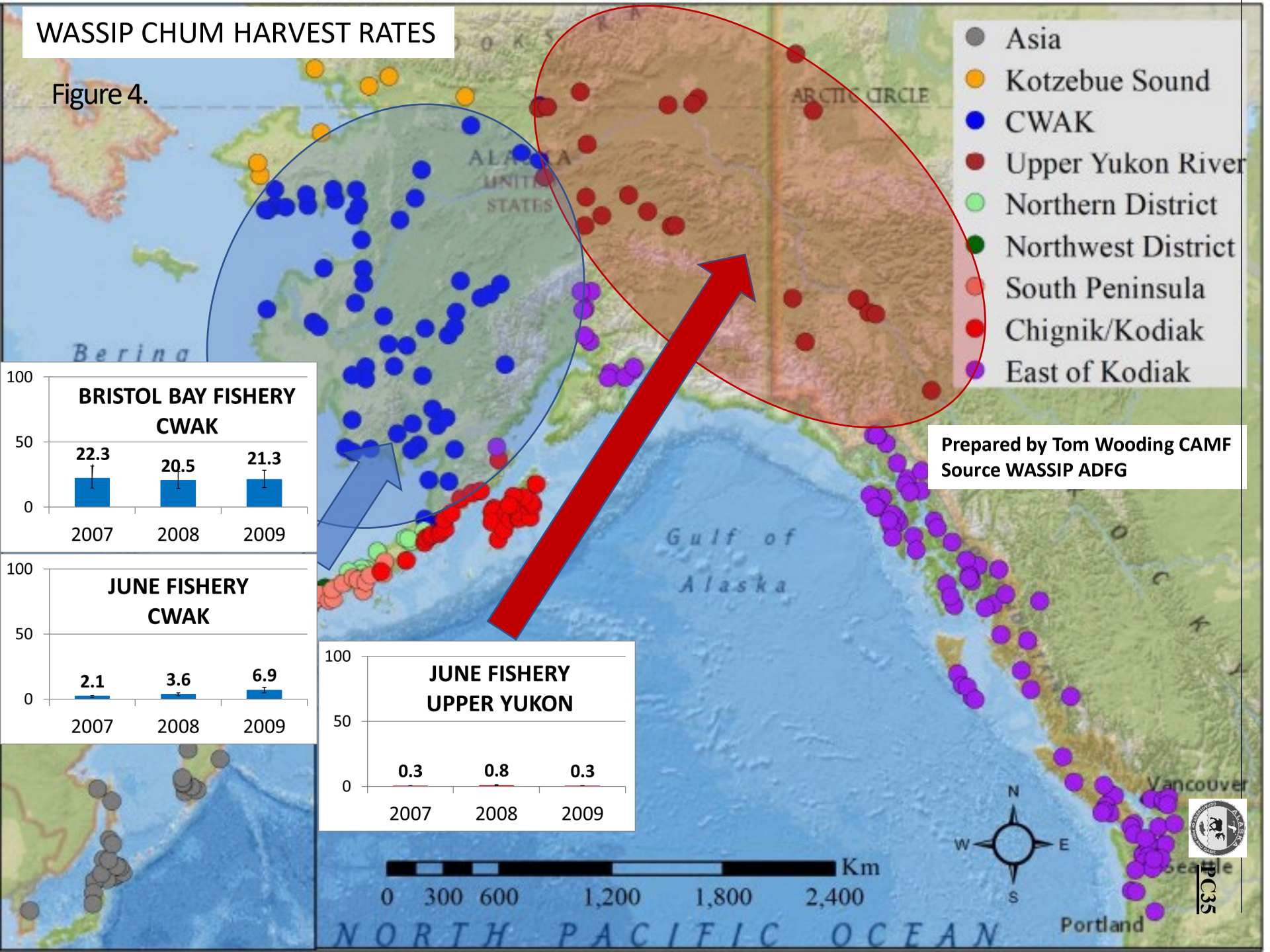


Figure 5.

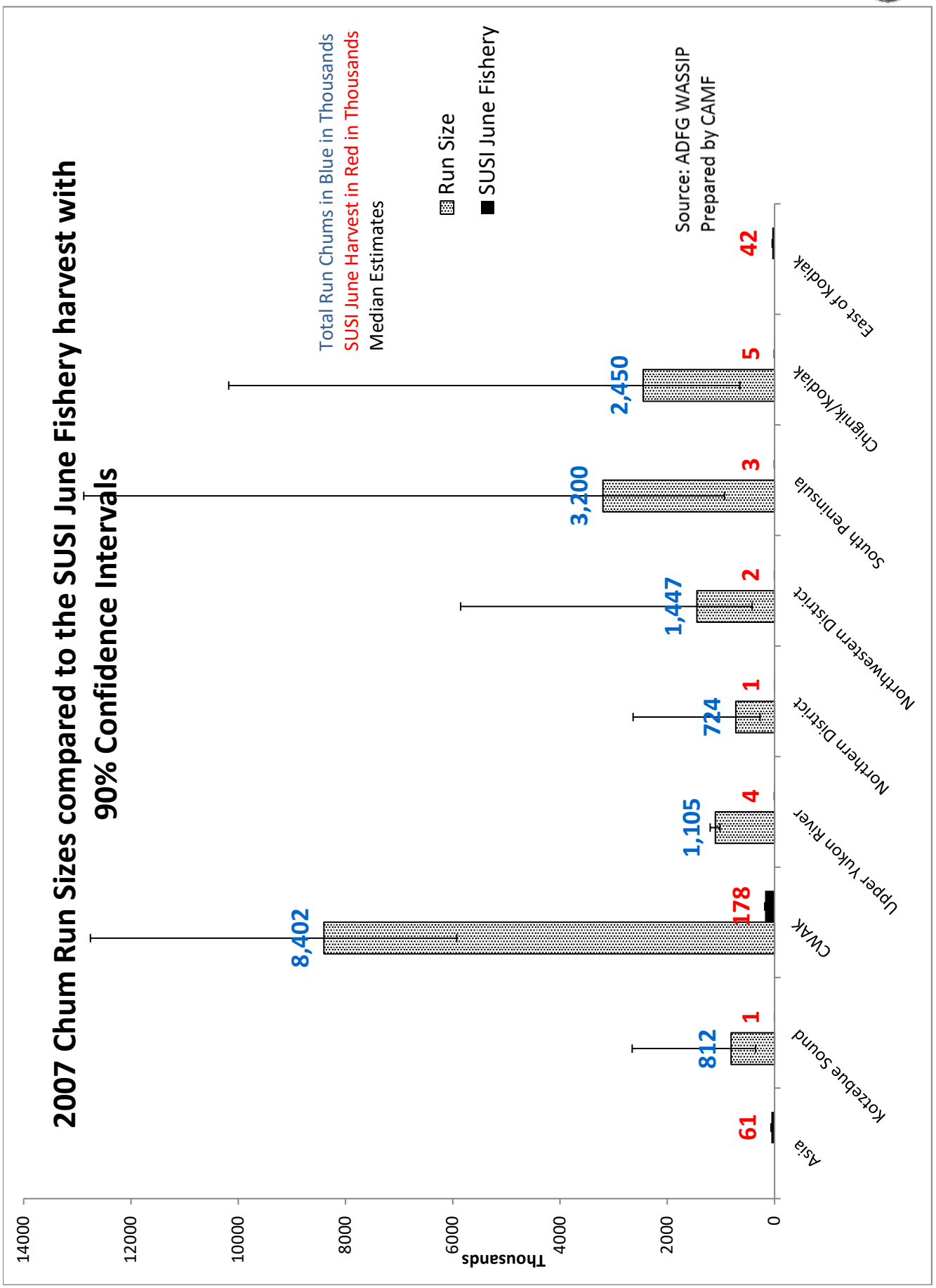
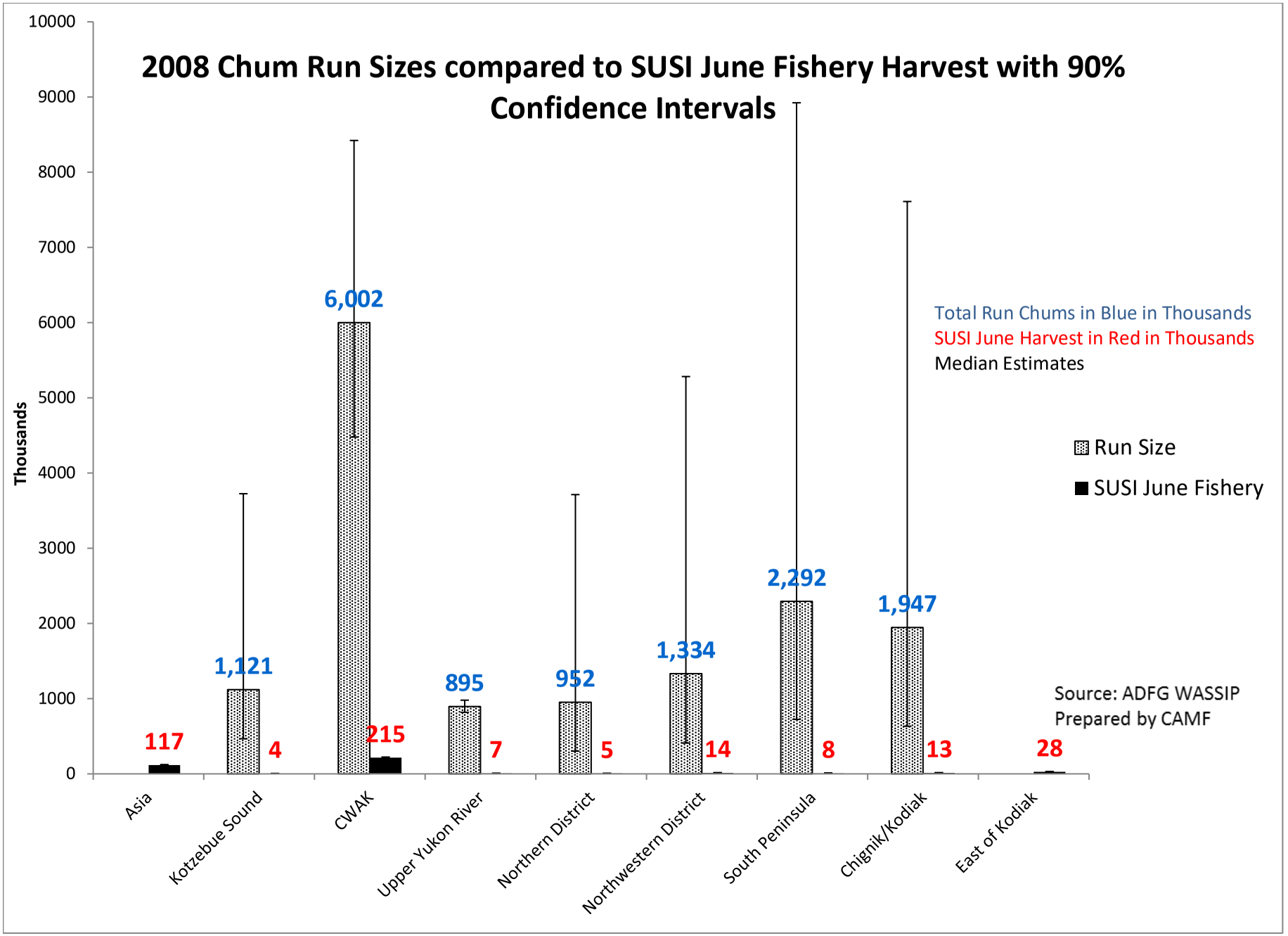

2007 Chum Run Sizes compared to the SUSI June Fishery harvest with
90% Confidence Intervals
Total Run Chums in Blue in Thousands
SUSI June Harvest in Red in Thousands
Median Estimates
Run Size
SUSI June Fishery
Source: ADFG WASSIP
Prepared by CAMF
Thousands
14000
12000
10000
8000
6000
4000
2000
0
Asia
Kotzebue Sound
CWAK
Upper Yukon River
Northern District
Northwestern District
South Peninsula
Chignik/Kodiak
East of Kodiak
61
812
1
8,402
178
1,105
4
724
1
1,447
2
3,200
3
2,450
5
42

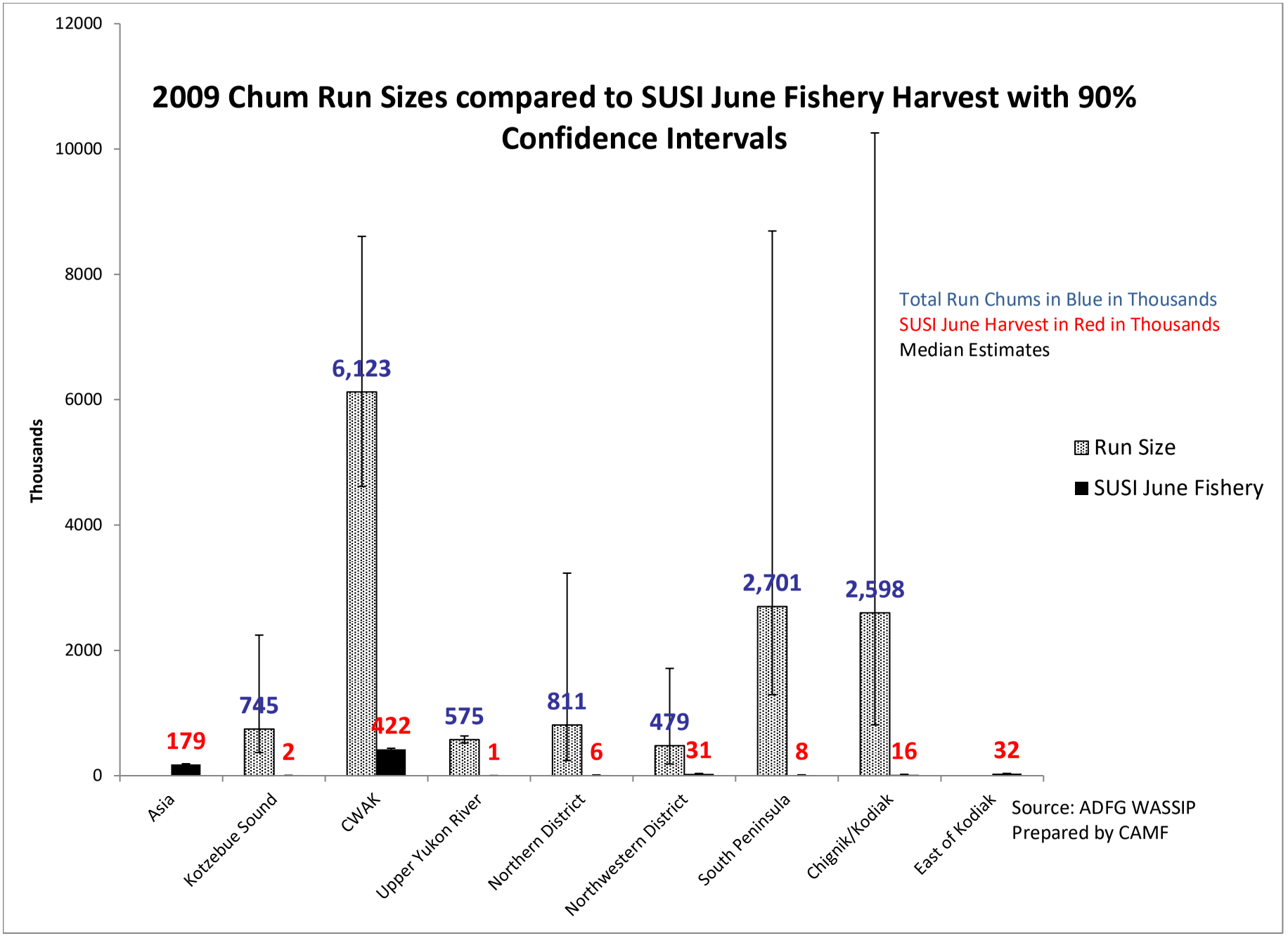
Figure 6.



PC35

CAMF
SOURCE WASSIP

Figure 7.



PC35

CAMF
SOURCE WASSIP

Figure 8. Due to the fact the migration occurs on a vast area of the ocean the SUSI June Fishery doesn't have the capability of achieving high harvest rates on a given stock.

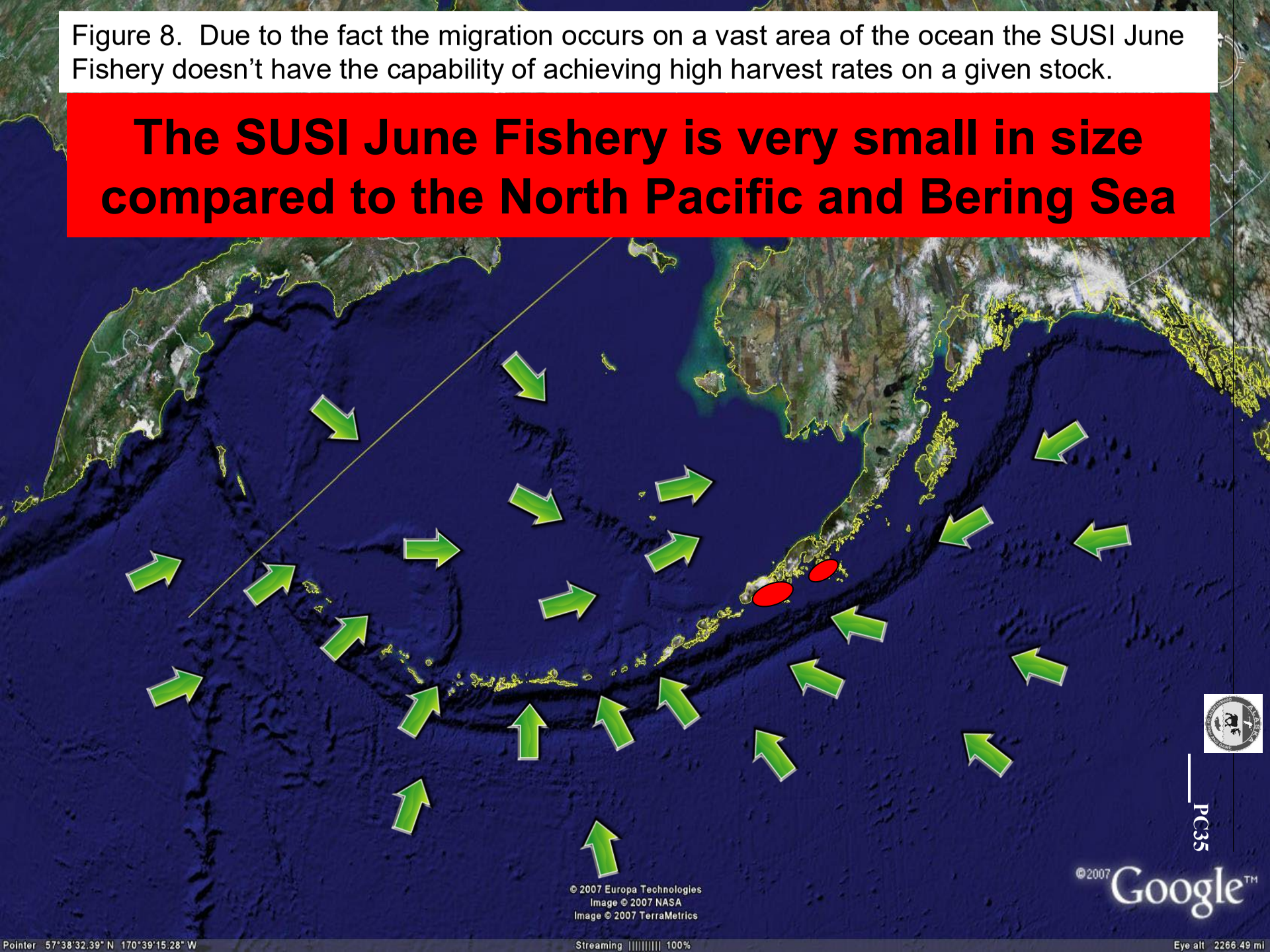
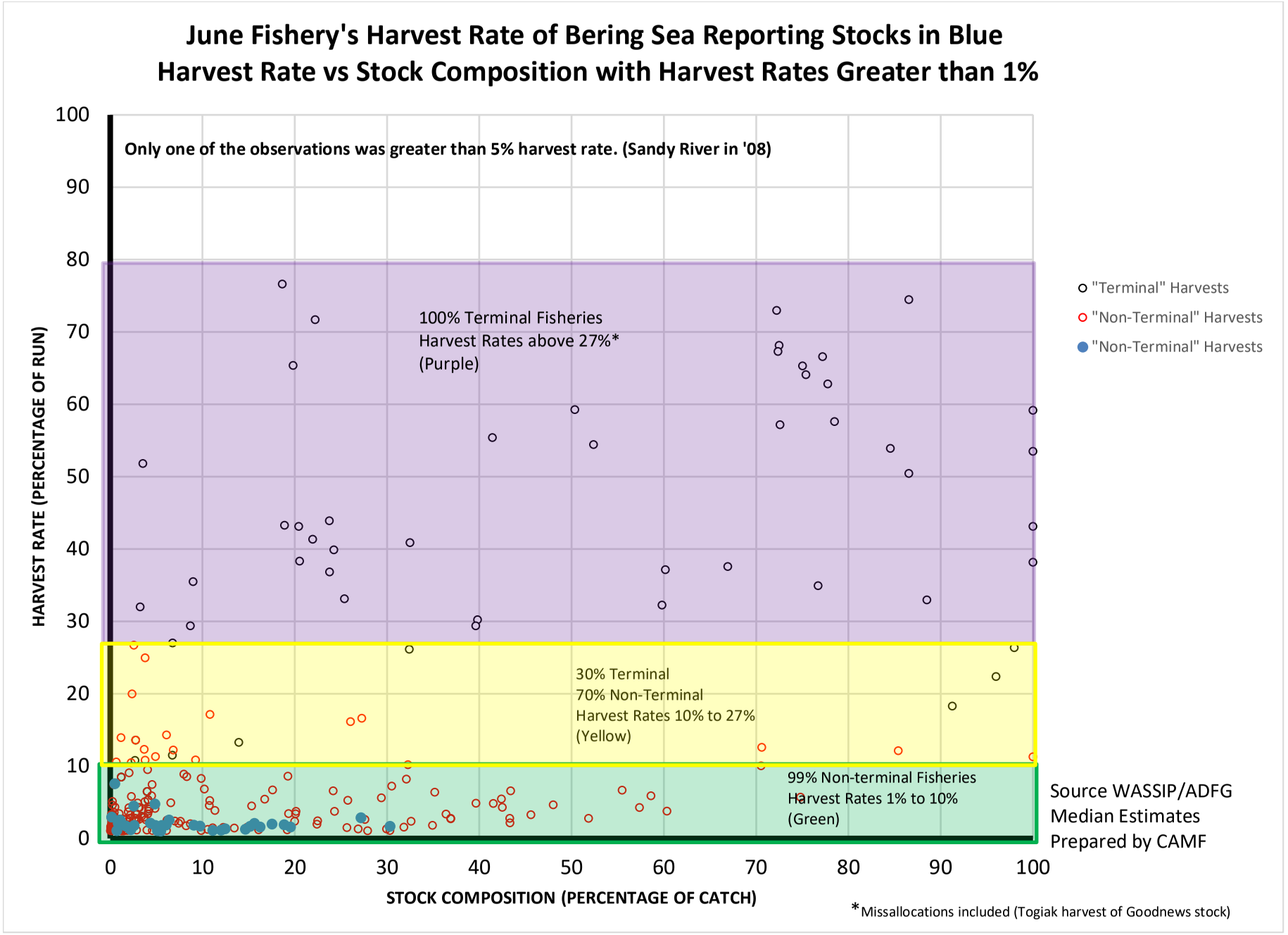


Figure 9.



PC35

PREPARED BY TOM WOODING CAMF
SOURCE WASSIP ADFG

PC36

Submitted by: Andrew Couch

Community of Residence: Palmer, Alaska

Comment: Members of the Alaska Board of Fisheries,

My name is Andrew Couch, I live and fish in the Upper Cook Inlet Area and provide guided salmon fishing trips in the Mat-Su Valley north of Anchorage. I wish to extend my support to several fisheries proposals that may help provide for salmon escapement needs and also may provide for reasonable common use subsistence, commercial, sport, and personal use salmon harvest opportunities other than the distant mixed stock commercial harvests of the Alaska Peninsula / Aleutian Islands that appear to be be taking an excessive amount of salmon bound for other parts of Alaska.

Support --Proposal 98 seeks to provide a better harvest opportunity for subsistence users who are not commercial permit holders in a relatively small area -- I strongly support the direction of this proposal as commercial users are already allowed to keep salmon from there commercial harvests for personal use.

Support -- Proposal 128 seeks to reduce gill net depth back to a maximum of 45 meshes (a depth used previously) in an effort to benefit salmon escapement and reasonable harvest opportunities for other users with a historical harvest opportunities that were likely reduced by the current 70 mesh depth nets. I would add -- In times of shortage reductions in net depth, mesh size, net length, and or net number may provide a means to provide all users a more reasonable shared harvest opportunity.

Support -- Proposal 135 Seeks to maintain a more historical percentage of sockeye harvest from one specific mixed stock harvest area in order to better maintain historical escapements and more terminal harvest opportunities for Chignik sockeye salmon. This would also allow passage of other east bound salmon stocks. This provides for more reasonable harvest opportunity for all users. Note: Propoal mentions Concept was used previously.

Support a Concept -- Proposal 143 seeks to count all immature salmon caught in the Shumagin Islands test seine net fishery rather than just those gilled in the seine web for fishery management. Immature salmon size varies and immature fish below a certain size may be caught in great numbers, but not gilled. Likewise if a large number of fish are caught in a set the percentage of immature salmon gilled by the web may likely be reduced. If this regulation is to provide protection for immature salmon -- the proposed change should do just that. I believe this concept to be the most important part of the proposal.

Support Concept -- Proposal 140 seeks to reduce commercial harvest opportunity in the South Unimak and Shumagin Islands during June in an effort to pass more chum and Chinook Salmon to the Arctic - Yukon -- Kuskokwim for both escapement and reasonable harvest opportunity needs. I agree with this concept and with the fact that it has been utilized before, so there is some past measurement to gauge what harvest levels could be in the South Unimak / Shumagin Islands area if adopted. Note: this would still allow harvest in this mixed stock harvest area, but at a lower level. Proposal 140 would also allow more East bound salmon stocks to pass through the fishery during June.

Note: There are several proposal calling for more commercial fishing in outer areas that may have less impact on local stocks -- I OPPOSE the concept of increasing harvests on nonlocal stocks that may also be at lower than historical abundance levels.

Thank you for serving on the Board of Fisheries and the countless hours you put into that effort. I ask that you prioritize the concepts of meeting established escapement goals and providing for reasonable shared harvest opportunities for all common user groups as you make your decisions.

Thank You,

Andrew Couch

Palmer, Alaska

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 98: Support
Proposal 104: Support
Proposal 105: Support
Proposal 107: Support With Amendments
Proposal 108: Support With Amendments
Proposal 111: Support With Amendments
Proposal 113: Support With Amendments
Proposal 114: Support With Amendments
Proposal 115: Support With Amendments
Proposal 116: Support With Amendments
Proposal 117: Support With Amendments
Proposal 118: Support With Amendments
Proposal 119: Support With Amendments
Proposal 128: Support
Proposal 135: Support
Proposal 137: Oppose
Proposal 140: Support
Proposal 143: Support
Proposal 150: Support

PC37

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial fisheries. I fish year-round here. Salmon fishing in the South Alaska Peninsula region keeps money flowing into our community, and is my sole source of employment. I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,
Keith Cross
kcknox@gmail.com
(907) 538-8439

PC38

January 14, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in Sand Point, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is very important. I was born and raised in Sand Point and I have commercial fished and subsistence used all of my life. I strongly believe that the science shows that we are not the problem with poor runs in western Alaska. I hope the board will take the science and use it to make the appropriate decisions. Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Sincerely,

Danny Cumberlidge
fv_gambler@hotmail.com
(907) 386-1040

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 107: Support
Proposal 108: Support
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 130: Support
Proposal 131: Support
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 152: Support

PC39

January 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial fisheries. I own the FV Primus which fishes primarily in the South Alaska Peninsula region. Salmon fishing in the South Alaska Peninsula region is very important; we have fished here since 1984 for salmon and other local fisheries. Year in and year out, salmon has been our main moneymaker in this area.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

John de Groen
jdegroen@windermere.com
(206) 605-5254

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC40

February 4, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. I'm a lifelong fisherman who has participated in commercial fishing and my family and I live a subsistence lifestyle from the ocean. Salmon fishing in the South Alaska Peninsula region is very important, and this matter is very important to me and my family. My family and I depend on making our living off fishing commercially and subsistence.

Sincerely,

Rudolph Demoski
rdemoskijr@gmail.com
(907) 497-7112

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sitka, Alaska and I participate in commercial and subsistence fisheries, as well as in processing work. I am an active commercial seine fishermen in Area M and an Alaska resident living in Southeast Alaska. My boat includes five crewmembers are all residents of Alaska and depend on commercial fishing for their livelihood.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Troy Denkinger
trdenkinger@gmail.com
(907) 738-6600

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC42

Submitted by: Rebecca Derendoff

Community of Residence: Huslia, Ak

Comment: Good day,

I would like to express my concern about our lack of fish in the Interior. Although we haven't always had an abundance of king salmon like the Yukon, it was still the main staple at our table. Since we haven't been able to eat fish, the medical problems increased. We've had to increase the processed foods which contain things we are not used to. This past year we've had 10 people come up with cancer. This is 4 times more than normal for a community our size. Please consider giving us leniency when making decisions about fishing the Koyukuk River. Thank you

Rebecca Derendoff

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

PC43

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in subsistence and sport fisheries. Salmon fishing in the South Alaska Peninsula region is very important as a way of living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Piama Dickson
kccadmin@arctic.net
(907) 421-7115

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC44

February 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska. My family is born and raised in Area M and has always fished and worked in this area. When at home, I'll subsistence fish. Salmon fishing in the South Alaska Peninsula region is VERY important as my family is born and raised in this area.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Mary Donaldson
aleutmaiden@hotmail.com
(907) 654-7123

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

George Donart
917 W. 20th Ave.
Anchorage, AK 99503
Feb. 4, 2023

PC45

My name is George Donart. I strongly support Proposal #140 as an essential conservation regulation. I'm a Yukon River fisherman.

I first started fishing in the lower river over 30 years ago. During that time, I've watched our Salmon fishery steadily dwindle, until 2020, when it ceased to exist, when every 6 inch mesh was banned from the river, when our Chums dropped off a cliff. For 3 years — going on 4 — all I can do is listen to Yukon Drainage teleconferences, monitor ADF&G's latest announcements, and watch the season's escapement numbers skim along the bottom of the fish count graph like dead salmon washing downstream.

When runs are extremely poor (~9% of normal for 2021 -- see Graph 1) getting every fish to its spawning grounds is vital to the survival of the entire run. So now, our gear has been restricted to 10 fathom, 4 inch, shore-tied nets, and Chums and Kings must be released.

On the fishermen and people of the Yukon drainage, the entire conservation burden has fallen.

This is reminiscent of gear restrictions we've fished under for nearly 10 years to protect King runs. Dip nets, for heaven's sake!

Yukon River fishermen understand -- every fish counts! During the season, ADF&G loves to point out -- Every (Yukon) Fish Counts! Proposal #140 embodies the spirit of that same management strategy.

From 2007 - 2009, nearly 3 out of 5 Area M Chum were from Western Alaska stocks. In 2021, over 1 million Chum were caught in the June fishery. We can't know where each of those fish would have spawned, nor, in 2021, could we know exactly what proportion were Western Alaska fish. But, we can be certain that the philosophy of Every Yukon Fish Counts! has not been applied in Area M, except perhaps in 2001-2003.

On the other hand, ADF&G regs explicitly prioritize protection of Chignik (Area L)

fish from interception by the Area M fishery ["...80% of sockeye salmon caught in SEDM ***are considered to be*** Chignik-bound...(5ACC 09.360)"] so that Chignik could reopen after years of closure. In clear language, ADF&G formally recognizes that fish traveling through parts of Area M are, in fact, Chignik fish. No such recognition nor protections apply to Western Alaska stocks in the Area M regs, unless Proposal #140 is adopted. Proposal #140 would recognize that an important number of Chum caught in Area M "are considered to be" Yukon Chum. It must also be added that the Chignik strategy and policy were very successful in conserving Chignik Sockeye and allowing the Chignik fisheries to reopen.

Climate change plays a huge role in the Western Alaska stock die-offs, both from marine heat waves and extra warm summers inland. Our fish are stressed and only a lucky few are making it home. During these times of extreme die-off, we've got to live by "every fish counts" both in river migration and marine migration if these runs are to be saved. The state would be shirking both legal and moral duty to not curtail interception of Western Alaska Salmon in the Aleutians.

The State of Alaska can't use lack of certainty or "we need more studies" to continue the status quo. Yukon fish are at far too much risk to drag feet now. We have the studies, we have the catch numbers, and we have the largest drainage in Alaska at risk of losing its salmon runs. The Board must conserve our Chums.

At present, ADF&G has not changed the Yukon Chum fishery into any type of conservation concern status. There has been no action from the State, even though the most productive tributaries have lost nearly 95% of their spawning population (see graph 2).

Western Alaska Chums pour through Area M in June. Proposal #140 strikes a balance by compelling conservation to help Western Alaska Salmon avoid endangered status, while continuing the June intercept fishery on a reduced schedule. Proposal #140 requires Area M fishermen to only stand down for part of each week in June; it doesn't require them to use dip nets!

Sincerely,

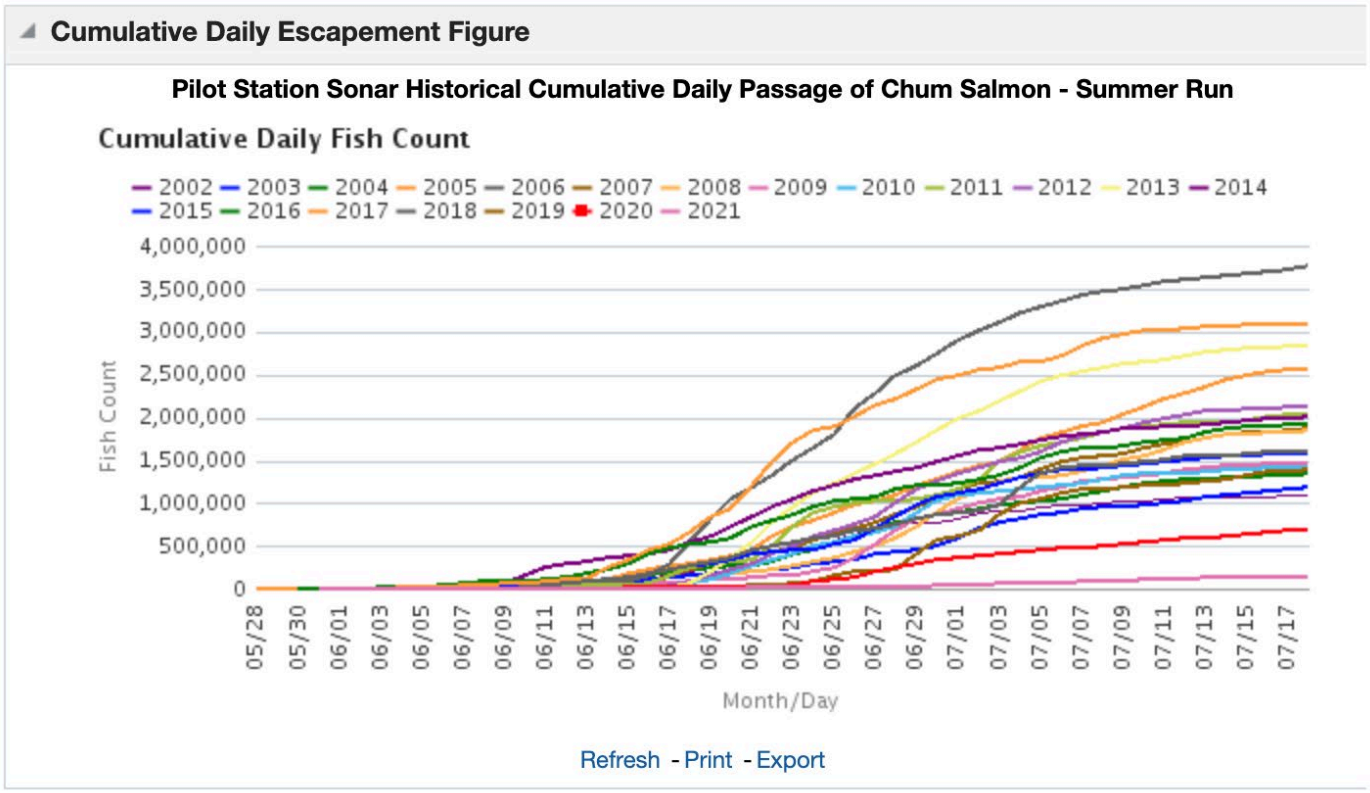
George Donart

Attached: figures 1 & 2 below

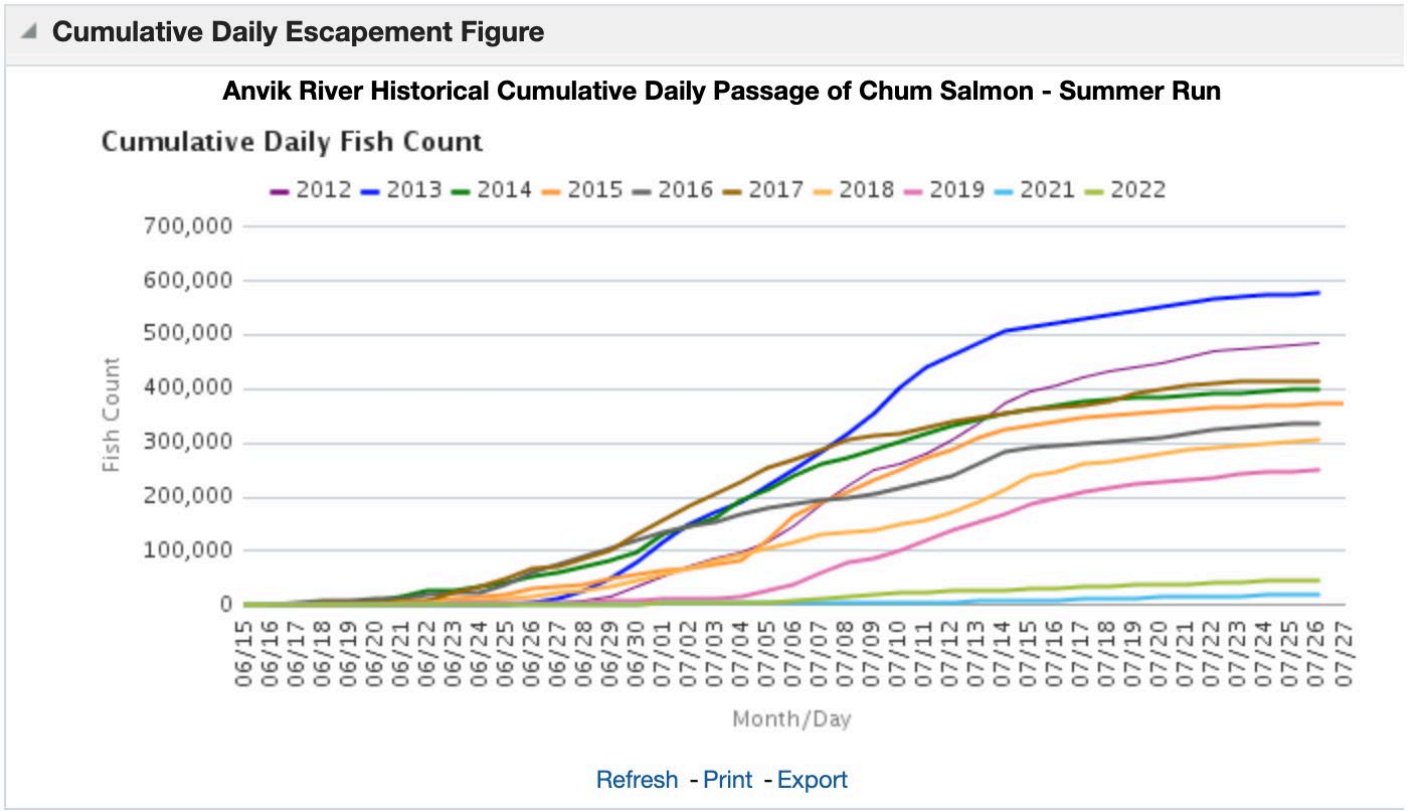
Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 134: Support
Proposal 136: Support With Amendments
Proposal 137: Support With Amendments
Proposal 138: Support
Proposal 139: Support With Amendments
Proposal 140: Support
Proposal 141: Support With Amendments

Graph 1:



Graph 2:



PC46

February 3, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial, subsistence, and sport fisheries. I am a commercial fisherman, deckhand, resident, fishery advocate, and local Unangax̂. Salmon fishing in the South Alaska Peninsula region is important. My family not only depends on the salmon run for our subsistence—it's also how we make a living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Maria Dosal
maria.l.dosal@gmail.com
(907) 532-7004

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC47

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is important as a source of income and way of living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Paul Dushkin
kccadmin@arctic.net
(907) 497-7065

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC48

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is important because it is a way of living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Esiah Dushkin
kccadmin@arctic.net
(907) 444-6255

PC49

Eastern Interior Alaska Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll-Free: 1-800-478-1456

In Reply Refer To:
RAC/EI.22132.BM

DEC 28 2022

Art Nelson, Executive Director
Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Mr. Nelson,

I am writing to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on three Board of Fisheries proposals that will be discussed at upcoming 2023 meetings.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Eastern Interior Alaska Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 5-6, 2022, in Fairbanks. Among the items discussed were various proposed changes to the State of Alaska fishing regulations. The proposals that the Council discussed and our positions on those proposal are listed below by regional meeting.

Arctic / Yukon / Kuskokwim Finfish

Proposal 80 - Restrict subsistence king salmon harvest in the middle and upper Yukon River.
The Council voted to **unanimously oppose Proposal 80.** The Council does not support this proposal and feels that its intentions are divisive, aiming to pit lower river and upper river users against each other. Further, it seeks to place a priority on commercial fishing in the

lower river, while restricting subsistence fishing in the upper river. This goes against a subsistence priority. There is no evidence to support the proponent's claims that up to 100,000 Chinook Salmon are being illegally harvested by upper river fishers. The Council feels it is important for all users to work together to conserve salmon and to equally share the burden of doing so.

Alaska Peninsula / Aleutian Island / Chignik Finfish

Proposal 140 - Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time. The Council voted to **unanimously support Proposal 140**. The Council supports this proposal because there is a major conservation concern for Yukon River salmon that are intercepted caught in this fishery. As shown by previous genetic sampling projects, this fishery can intercept half of the Summer Chum Salmon bound for Western Alaska and the Yukon River. Interception of Yukon River salmon severely impacts the ability of people to meet subsistence needs on the Yukon River and other Western Alaska drainages. Summer Chum Salmon is a primary food source for Yukon River residents, especially for residents of the lower and middle Yukon River. The Yukon region has been closed to subsistence fishing for several years, while commercial fishers have been allowed to harvest the same stock of concern. This does not adhere to the subsistence priority nor sustainable management practices. Management needs to occur across the entire salmon ecosystem and should not ignore what happens in this fishery and its negative impacts on subsistence users in other regions.

Statewide Finfish and Supplemental Issues

Proposal 165 - Prohibit compensation for guide services in subsistence fisheries. The Council voted to **unanimously support Proposal 165.** The Council supports this proposal because using commercial guide services is contrary to what it means to practice subsistence. Subsistence by definition is noncommercial, and the Council does not feel guides should profit from it.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@fws.gov.

Sincerely,

Sue Entsminger

Sue Entsminger
Chair Regional Advisory Council
Eastern Interior Region

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council Members

PC49

Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 140: Support

PC50

Submitted by: Trevor Edwards

Community of Residence: Nelson lagoon, Alaska

Comment:

Proposal 120; I agree with this proposal of changing the time for fishing to become 3 days of fishing time and 4 days of closed time across the sections of fishing areas to give a good shot at any fish heading to Nelson Lagoon have a fighting chance to make up the river. I feel that this is a good possible way to ensure that fish get a good chance as we have seen before with the rolling closures that have been proposed and implemented had slightly helped but what really had helped was when they had been put on limits across the area up north from the lagoon and it had drastically increased the amount of fish. It helped so much that at people in the lagoon were praying for the limits to stay. So to me that shows proof that any limited time whether it be area or fishing time will help. So if all areas close for 4 days at a time that gives a good shot for fish to make it back to the lagoon.

Proposal 128; I support the proposal to implement the change of gear mesh depth to 45 meshes, but this will not include Nelson Lagoon for the fact they inside the lagoon uses 29 meshes. It has always been that way and always will be that way. This is another proposal that will I think in affect have some help in allowing more fish to have a fighting chance to be able to make it past some nets.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 120: Support With Amendments

Proposal 128: Support With Amendments

Alaska House of Representatives

PC51

During Interim:
PO Box 1630
Nome, Alaska 99762
Phone: (907) 443-5036
Fax: (907) 443-2162

During Session:
120 4th St. – State Capitol
Juneau, Alaska 99801
Phone: (907) 465-3789
Toll Free: 800-478-3789

REPRESENTATIVE NEAL FOSTER
Rep.Neal.Foster@akleg.gov

November 28, 2022

Alaska Board of Fisheries
Art Nelson, Ex. Director
333 Raspberry Rd.
Anchorage, AK 99518-1565
*Letter sent electronically.

Mr. Nelson and Distinguished Board Members,

I am writing in support of Proposal 140 in the Alaska Peninsula / Aleutian Island / Chignik Finfish 2022-2023 Proposal Book. Proposal 140 by the Fairbanks Advisory Committee would revert the Area M Salmon Management Plan to the 2001-2003 Management Plan thereby significantly reducing intercept harvest of chinook and chum salmon in the June fishery. Proposal 140 will help recover the long-term sustainability of salmon stock while providing a fair and balanced approach to everyone impacted during these recent declines.

For three years, chum and chinook commercial and subsistence salmon fishing has been drastically reduced or closed along the Yukon River and coastal communities. For three years, constituents in my rural Alaska district have been unable to feed their families through traditional, healthy means and required to rely on donations or high-priced, store-bought food. For three years their income has been significantly reduced or eliminated in a region with few jobs. Rural, Yukon River families and communities are bearing the brunt of this annual disaster.

The severe decline of chinook and chum salmon along the Yukon River is threatening the viability of those stocks. Alaska Fish and Game's (ADF&G) May 2022 stock report shows that the last three years of Western Alaska Chinook Salmon runs have been the poorest on record. Escapement goals are not being met. Meanwhile, salmon are still being harvested in large numbers in Area M Intercept Fisheries with no limitations. It is recognized that not all salmon caught in Area M Intercept Fisheries are bound for the Yukon. Unfortunately, ADF&G states their genetic research on stock identification, will not be completed until 2026. In the meantime, my constituents go without food, jobs, and continued loss of traditions and cultural ways of life. Proposal 140 would help reduce the threat of losing the Yukon River stocks completely, improve escapement numbers, and improve financial and food security for rural Alaskans.

I have received countless calls, emails, and letters from constituents alarmed by the salmon declines along the Yukon. The Alaska Federation of Natives recently voted to pass Resolution 22-2 at their annual convention in support of reducing Area M intercept harvest and improved research (attached). I urge the Board of Fisheries to adopt Proposal 140 to reduce intercept harvest of chinook and chum salmon in the June fishery and support rural Alaskans.

Sincerely,

Neal Foster

Rep. Neal Foster
District 39

Attachment: Alaska Federation of Natives Resolution 22-2

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 140: Support

ALASKA FEDERATION OF NATIVES
2022 ANNUAL CONVENTION
RESOLUTION 22-2

TITLE: A RESOLUTION REQUESTING THE ALASKA DEPARTMENT OF FISH AND GAME SUPPORT MEASURES THAT DECREASE INTERCEPT OF CHINOOK AND CHUM SALMON IN AREA M AFFECTING THE WESTERN AND INTERIOR ALASKAN SALMON CRISIS

WHEREAS: The Alaska Federation of Natives (AFN) is the largest statewide Native organization in Alaska, and its membership includes 209 federally recognized tribes, 185 village corporations, 10 regional corporations, and 12 regional nonprofit and tribal consortiums that contract and compact to run federal and state programs; and

WHEREAS: The mission of AFN is to enhance and promote the cultural, economic, and political voice of the entire Alaska Native community; and

WHEREAS: Alaska Natives have stewarded their territories for over 10,000 years to ensure the health, well-being, social and cultural foundation, and spiritual existence of their peoples, as well as that of the animals, lands, and waters since time immemorial; and

WHEREAS: The continuing decline of Chinook salmon in several major systems of the Arctic-Yukon-Kuskokwim (AYK), and the decline of summer and fall chum salmon in the AYK and in portions of the North and South Peninsula (Nelson Lagoon, Port Heiden) and the Chignik region are threatening the food security of many Alaska Native communities; and

WHEREAS: The decline of run strength and average size of many salmon stocks is now threatening the continuing viability of those stocks into the future; and

WHEREAS: Alaska Native stakeholders bear the greatest burden of loss of salmon stocks; and have not reached Amounts Necessary for Subsistence (ANS) in several systems for many years; and

WHEREAS: The South Unimak and Shumagin Islands (Area M) June fisheries harvest chinook salmon**,** sockeye salmon and chum salmon in a mixed stock fishery. These stocks of salmon are bound for Bristol Bay and the Arctic-Yukon-Kuskokwim region, as well as other areas across the North Pacific Ocean. These salmon stocks have historically been intercepted in significant numbers along the Alaska Peninsula.

WHEREAS: The Alaska Department of Fish and Game (ADF&G) is the management authority for the commercial fishing in Area M; and

WHEREAS: ADF&G's stock reports from May of 2022 show that the 2020, 2021, 2022 Western Alaska Chinook salmon runs have been the poorest on record. In most of Western Alaska, 2020 and 2021, chum salmon runs were the lowest on

record. This year was the smallest return to all spawning streams for Chinook and Chum despite being the first time in recorded history wherein Yukon River Fishermen were not allowed to harvest any salmon anywhere in the Yukon River Basin (US and Canada) at any time; and

WHEREAS: Despite a complete ban on fishing on the Yukon River, including for subsistence needs, no limitations have been placed on commercial fishermen in Area M, and commercial fishers are catching historically high numbers of chum salmon—upwards of 2.5 million fish; and

WHEREAS: In response to requests to limit commercial fishing, the ADF&G has repeatedly noted that there is insufficient genetic evidence from the 10-year-old Western Alaska Salmon Stock Identification Program (WASSIP) study to warrant reduction of Area M commercial fishing, and that a current multi-year genetic study will not be completed until 2026; and

WHEREAS: A coalition of AYK stakeholders has continually met over the last two years to promote emergency measures to reduce the harvest of Chinook and chum salmon in Area M because there is no time to wait for further genetic studies; and

WHEREAS: The Fairbanks Advisory Committee, Tanana Chiefs Conference, and other stakeholders have submitted proposals to the Alaska Board of Fisheries (BOF) to be considered at the February 2023 BOF meeting on the South Peninsula, Area M, including proposals which would revert the Area M Salmon Management Plan to the 2001-2003 Management Plan thereby significantly reducing Area M intercept harvest of Chinook and chum salmon in the June fishery.

NOW THEREFORE BE IT RESOLVED BY the delegates of the 2022 Annual Convention of the Alaska Federation of Natives to review and support Board of Fisheries proposals that significantly reduce Area M intercept harvest of Chinook and chum salmon in the June fishery; and

BE IT FURTHER RESOLVED BY the delegates of the 2022 Annual Convention of the Alaska Federation of Natives request that ADF&G conduct an extensive ecosystems review of the effect of productivity of wild salmon stocks within the Bering Sea and Aleutian Islands in comparison to populations of hatchery stocks, bycatch harvest rates, and Western Alaska stock escapements of Chinook, summer and fall chum, and coho salmon. And, further, to compare the reduction of average size of all wild salmon stocks, including sockeye, to the same.

SUBMITTED BY: TANANA CHIEFS CONFERENCE, KAWERAK INC., BETHEL NATIVE CORPORATION, SEA LION CORPORATION, ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS
BOARD ACTION: NO RECOMMENDATION
CONVENTION ACTION: PASS ON OCTOBER 22, 2022

PC52

February 1, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, and personal use fisheries, as well as through local business supporting fisheries. I am Alaska Native—Aleut. I am a tribal member and corporation member. I have a business that ties to the salmon fishery: net mending working on fishermen's gear.

Salmon fishing in the South Alaska Peninsula region is very important to the livelihood of the community I live in. My father and grandfathers and great-grandfathers have participated in the fisheries and have depended upon the fishery for food and obtaining a livelihood. We are dependent upon salmon fishing along with subsistence fishing. Please use science when making decisions at the Board of Fish and not be biased on decisions that affect our fishery. It costs us lot of money to attend the Board of Fish every year. I am against every proposal against Area M fishery. Please do not butcher our fishery—keep it intact. Don't blame us—use the scientific knowledge that is readily available to look at. Look at the ocean conditions, the ocean temperature, and poor prey density. I do not want my community to die; I want to be able to continue to live and work here.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Wesley Foster
wes_foster61@yahoo.com
(907) 383-2104

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC53

February 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, and personal use fisheries. I am originally from Unga, Alaska and my Unangaŷ ancestors before me have been fishing the waters of Area M for the past 10,000 years. I moved to Sand Point when I was younger and have continued fishing here since. I have owned and maintained my own fishing operations for almost the last 50 years. I participate in South Alaskan Peninsula fisheries year-round, and I employ a local crew on my two fishing vessels.

Salmon fishing in the South Alaska Peninsula region provides not only employment for nearly half of the residents in our communities, it also provides revenue to the communities through a fish-landing tax. These funds are used to keep our communities livable and safe for future generations. I worry that smaller communities in the AEB will be unlivable with minimal future opportunities if salmon fishing is not an option. I have taught my children and grandchildren how to salmon fish for personal use also, teaching them how to provide for themselves and their families.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Dwain Foster
captcod3091@aol.com
(907) 383-3091

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC54

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is important because both the city and borough rely on it for income. Without the Bering Sea fishing, I'm afraid for them already. I operate a vessel year-round in Area M, I live in Sand Point, and employ a mostly local crew.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

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According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Dwain Foster Jr
fishkiller080@gmail.com
(907) 602-9445

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC55

AMY AND JACK FOSTER JR
P. O. BOX 254
SAND POINT, ALASKA 99661

February 6, 2023

Alaska Department of Fish and Game
Boards Support Section-Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811-5526

Attn: Alaska Board of Fisheries

Marit Carlson-Van Dort, Chair
McKenzie Mitchell
John Wood
Stan Zuray
John Jensen
Mike Heimbuch
Tom Carpenter

PROPOSAL 131

5 AAC 09.360. SOUTHEASTERN DISTRICT MAINLAND SALMON MANAGEMENT PLAN

Amend the Southeastern District Mainland Management Plan to allow commercial salmon fishing with set gillnet gear, and after July 11, purse seine gear concurrent to open commercial fishing periods for salmon in the Chignik Management Area……..

WHO ARE WE

My husband and I are of Aleut Unangax descent with a mix of Scandinavian ancestry. We both come from prominent indigenous villages that are currently abandoned today. Amy from Unga, with parents and grandparents from former villages of Squaw harbor, Pirate Cove and Korovin Island, Jack's family from Sanak Island. Our homelands are rich in cultural history all tied to the abundance of fish and marine life ideal for subsistence and commercial use. Economic necessity forced residents to move from these abandoned villages along the Alaska Peninsula and Shumagin Islands moving to Sand Point and elsewhere.

My ancestors and native Unangax people have traditionally fished for salmon from time immemorial . Catching salmon for myself began when I was 12 years old on my father's boat, then as an adult fishing alongside my husband. Jack has been fishing since he was a young child with an accumulation of over 50 years experience in all three gear types of salmon fisheries. Drifting and seining Jack has participated in. In 2000 Jack decided to switch from seining to the set net fishery and a few years later his wife joined him in set netting along with their three children. Family not all to this day fish with a crew and grandchildren easing their way into the fishery.

SEDM – SOUTH EAST DISTRICT MAINLAND

An area relatively small in size, an area a few short miles from my home, an area that is closed many years to the local fishing fleet, an area for centuries our ancestors historically fished, an area that is heavily restricted with various management issues that hinder any viable efforts to fish on South East District Mainland. Emergency orders put forth in front of us to close any potential area of the South Alaska Peninsula fishery hinders viable efforts to fish on the SEDM which is creating a negative impact on the SEDM fishery.

Many set netters have recorded DNR shore fishery leases that are paid yearly to the State of Alaska some of these leases are in the SEDM. The majority of these shore fishery leases have been in place for well over 100 years, the only difference is hands have changed on who holds the title to the shore fishery lease; the locations have stayed the same throughout the years.

DESCRIPTION OF THE CURRENT MANAGEMENT PLAN OF THE SEDM

"*Under the current SEDM Salmon Management Plan (5AAC09.360) states:*

1. *The percentage of Chignik bound sockeye salmon allocated to the SEDM fishery is 7.6% of the total number of sockeye salmon harvested in the CMA through July 25.*
2. *From June 1 through July 25, 80% of the sockeye salmon caught in the SEDM are considered to be Chignik bound salmon, excluding NWSS after July 1.*
3. *Beginning July 1, sockeye salmon caught in NWSS, are considered 100% local fish and not counted toward the Chignik allocation. Fishing in NWSS beginning on July 1, excluding Orzinski Bay may not open for more than an aggregate of 96 hours during a 7 day period. Fishing time in Orzinski Bay, after June 30, is based on sockeye salmon escapement into Orzinki Lake.*
4. *If Orzinkee Lake escapement meets or exceeds 25,000 sockeye salmon, NWSS and Orzinski Bay could be opened concurrently as follows:*
    a. *Set gillnet gear may be operated continuously until midnight July 25, and*
    b. *Purse seine and hand purse seine gear may be operated for no more than an aggregate of 96 hours during a 7 day period.*
5. *A limited portion of Orzinski Bay may open to purse seine gear prior to July 11 if ADF&G determines the interim escapement objectives have been exceeded.*
6. *The Stepovak Flats Section is managed for chum salmon returning to Stepovak Flats stream for the entire season. However, 80% of the sockeye salmon caught in this section through July 25 are considered Chignik Bound fish.*
7. *The area encompassing Kupreanof Point is closed to commercial salmon fishing from July 6 through August 31. ADF&G may extend the Kupreanof Point closed waters area through the end of the season through emergency order.*
8. *From July 26 through October 31, the fishery is managed for local pink, chum, and coho salmon stocks.*
9. *From July 26 through October 31, the fishery is closed for at least one 36 hour period within a 7 day period.*

Also, we have to contend with another colossal regulation that is hindering any viable efforts to fish on the SEDM, creating havoc and an enormous negative impact on the SEDM fishery, is the Chignik River Sockeye Salmon harvest forecast, and SEDM Allocation: *"ADF&G will manage the fisheries so that the number of sockeye salmon harvested in CMA, for both runs combined, will be at least 600,000 fish and the harvest of sockeye salmon considered to be Chignik bound in the SEDM will approach as near as possible, 7.6 % of the total CMA sockeye salmon harvest through July 25. If the Chignik River early run fails to develop as predicted, the department will curtail fishing in the SEDM, excluding Orzinski Bay, until at least 300,000 sockeye have been harvested of the Chignik River sockeye salmon late run cannot be accurately evaluated due to the mixing of early and later un stocks. During this transition period, ADF&G may close or restrict commercial salmon fishing in SEDM until the strength of the late run has been determined. After July 8 if at least 300,000 sockeye salmon have been harvested in the CMA and escapement objectives are being met for the Chignik later run, the department will manage the fishery so that the number of sockeye salmon harvested in the CMA is at least 600,000. The number of sockeye salmon harvested in the SEDM before July 25 will be managed so the 7.6% of the total harvest of Chignik River sockeye salmon is taken in the SEDM. However, the harvest in SEDM at any time before July 25 may be permitted to fluctuate above or below 7.6 % of the Chignik Area harvest."*

There are several items that are wrong with the current SEDM regulations:
In the SEDM it is assumed that 80% of salmon are Chignik bound through July 25 and in Northwest Stepovak Section through June 30 despite the fact that the most recent genetic study in the SEDM shows that this number when averaged across the 3 study years (2010-2012 is closer to 66% not 80%.

Our neighbors in Chignik have had busts in their fisheries along with good years in their fisheries. Also, noted should be the fact that it wasn't a good season for many boats and fishermen in our area either. Under the current regulations of the SEDM for our fishermen that historically fish in the SEDM it is a bust for us also not only for the last five years but for several intermittent years prior since these regulations have been implemented.

Listed below are SEDM closures pulled from the ADF&G's Annual Management Reports for the Alaska Peninsula and Chignik:

SEDM CLOSURES

1997 – No harvest in SEDM except NWSS CMA opening on June 17 delayed because fishermen were on strike for higher prices. The next opening was on June 27-June 28, reopened July 1-July7, then again July 11-14.

2007 – No harvest in SEDM

2008 – No harvest in SEDM

2014 – No harvest in SEDM

2018 – No harvest in SEDM

2019 – No harvest in SEDM

2020 – No harvest in SEDM

2021 – No harvest in SEDM

2022 – No harvest in SEDM

There are several items wrong with the current SEDM regulations and if nothing is done the local set netters will continue to be denied access to a historical fishery area, which is affecting the viability of set netting in the region and continues to overcrowd within the islands. Managing SEDM based on Chignik priority currently isn't and has not worked. Governing a resource

The main problem addressed in our proposal is that we are limited in time to fish in many years or with the current trend not being able to fish at all due to the fact that some prior board decided to tie SEDM/Cape Igvak fishing time into CMA harvest, despite the fact that no other fishery in the State of Alaska operates that way.

How can it be that CMA can manage an area in Area M in the SEDM from Kuprenof Point to McGinety Point with that same distance in Area L would be from Kuprenof Point to a point close to Castle Cape? Currently Dolgoi area is also controlled by CMA, and when looking at a map that distance is a substantial amount of shoreline and area and if you look at the distance and equate it in Area L from Kuprenof Point onwards toward the east end of Area L you can see the distance going several miles past Chignik.

We cannot easily fish elsewhere in Area M when SEDM is closed, the obstacles include overcrowding, inclement weather that inhibits set netting, added costs and takes away fishing time. The severe economic binders need to be lifted and changed during this upcoming board meeting later this month. The fishermen in SEDM have been squeezed out of an area of fishing at the same time treated like Area L permit holders when the fact is we are set netters fishing old historical sites that have been fished for many hundreds and thousands of years. Proposals both past and present to restrict our area is basically putting us slowly out of business if no diversity or regular consistent openings occur in our area.

There was one year in 2011 Chignik fishermen realized historic returns of red salmon despite continuous fishing in the SEDM by the set net fleet. The set net fleet only realized moderate returns with no impact or obvious effect on Chignik runs. The SEDM mainland fishery was open in June and part of July of over 30 days with set net fishermen catching very low numbers of sockeye salmon daily ultimately not making an impact on our neighboring Chignik fishery.

AMENDMENT TO REGULATION

Revise the Southeastern District Mainland Management Plan to allow commercial salmon fishing with set net gear and after July 11 seine gear concurrent to the Chignik Area Commercial Salmon Fishery as follows: Conduct concurrent fishing periods between Area L (Chignik) and Southeastern District Mainland (SEDM). (a) Elimination of the harvest of 300,000-600,000 red salmon in the Chignik Areas before fishermen in the SEDM can harvest salmon; (b) to fish concurrently while Area L (Chignik fishermen are fishing Area M fishermen are fishing in the SEDM area.

The current board needs to address the issues of the SEDM fishery. Is it right to shut down one area in order to guarantee their neighbors millions of dollars' worth of priority to a public resource? Our families, our fishermen, our communities have depended upon this resource for many decades and years, 1915 is over 100 years but then again if you think of our Unangax ancestors it is time immemorial of our people utilizing the resources of the SEDM. We need an opportunity to fish where our ancestors have traditionally fished. The economic binders the board has placed on the SEDM should be removed. The salmon are a state resource that the fishermen in this area have as much a right to as anyone else to harvest.

Science needs to be acknowledged in deliberations rather than political pressures. A wide host of challenges can threaten the fishing industry's viability. Resource management is a key concern facing our fisheries. It's a giant ocean; our fishermen have developed protocols for conservation efforts but in the long run have sacrificed a viable income and have faced the biggest conservation burdens of a mixed stock fishery within our area, not being recognized by a terminal fishery, because the conservation measures are completely different in nature.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC56

January 22, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries. I have commercial salmon fished since I was eight years old. I would like to continue to fish salmon. Please keep the status quo for Area M. Salmon fishing in the South Alaska Peninsula region is how I survive long, cold winters.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Arlin Galovin
arlingalovin@gmail.com
(907) 383-4850

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC57

February 4, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is very important. I have fished for my entire life and I own the F/V Shawna Rae, which fishes year round in Area M, based out of Sand Point. I make regular trips on my boat to participate in subsistence fishing to feed my family. My entire family fishes alongside of me to provide for their families.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021.

Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Steven Galovin
sgalovin@outlook.com
(907) 386-6010

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC58

Submitted by: Glen Gardner Jr

Community of Residence: Sand Point

Comment: First off, I would like to remind you that there are six tribes in our region. These Native peoples also rely on the fisheries to meet the everyday needs. As the Area M Fisheries are the oldest fisheries in the State of Alaska, and the Aleut Peoples are the oldest Native Peoples (14,000 years old have been recorded) we should be able to access this fishery to make a living. Science doesn't support these drastic measures of reducing fishing and or shutting down the fishery. All of our Native Communities are involved in the commercial fisheries and are supported by this industry. I hope the Board had a chance to read the article in the Anchorage Daily News by Lena Hoblet from False Pass. She has given real insight into these issues. Please Read. Thanks Glen Jr.

I would like to support status quo in the Area M fisheries. Along with COVID-19 and possible reductions in the Area- M fisheries our local businesses will take another big hit in the bottom line. Shumagin Corporation Businesses are directly supported by the folks who participate in these fisheries. Shutting down or reducing any part of these fisheries will drastically affect our local economy, which is fragile at present. Our fishermen have given of themselves every Board process, It is time we follow Science and not reduce ourselves to the petty politics. Thanks Glen Jr.

Good afternoon, Board members I would like to make a comment on the whole process. I read a very good article in the Anchorage Daily News and I think Lena Hoblet nailed it. We have to remember that there are Native peoples on both sides of the equation. I realize that our family to the North are having hardships, but we need to get to the real problems that are facing the fisheries. It is not going to solve AYK issues by shutting down Area M. It will just create more hardships in the six communities in Aletians East Borough who are trying their hardest to make ends meet. Lets keep this simple and follow the SCIENCE to make these fisheries prosperous. Thanks, Glen Jr.

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PC59

February 3, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Atka, Alaska and I participate in subsistence, sport, and personal use fisheries. As an Elder, I know that salmon fishing in the South Alaska Peninsula region, particularly subsistence fishing, is our way of living.

Sincerely,

Robert Golley
golleyrobert@gmail.com
(907) 341-7148

PC60

January 31, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is very important so that we can stay in our community and live.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Sharon Gould
nstar4@me.com
(907) 497-2273

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Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC61

January 3, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. I am King Cove Corp. President and I have served as a King Cove City Council member for the past 38 years. Most of all, I'm an Area M fisherman. Salmon fishing in the South Alaska Peninsula region is very important; I was born and raised in King Cove. I fished with my dad, and then I bought one of his boats to keep fishing, and I hopefully could pass it down one day myself.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

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Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Dean Gould
nstar84@icloud.com
(907) 497-2273

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

Comments on Proposal 103 – Reduce the bag and possession limit for coho and sockeye salmon in the salt waters and freshwater drainages of Cold Bay

We are opposed to this proposal for the following reasons:

1) There is no supporting data that indicates that Coho salmon runs are in trouble in any of the 4 creeks/rivers accessible in the Cold Bay area. In fact, what data is presented suggests the opposite. The 2022 Alaska Fish and Game survey for Russell Creek was higher than the long-term average. Runs in the other 3 creeks (Trout, Frosty, and Mortensens Lagoon) also have strong Coho runs. Given the remoteness of Cold Bay and low population in the region, all these creeks receive very light fishing pressure. Reducing the bag and passion limit of Coho to 2 fish is not warranted.

2) As a business owner the implementation of this proposal will have a significant negative impact on my business and many other businesses in the Cold Bay area that depend on sportsmen and women visiting from outside the region. This includes 8 outfitters, grocery store, vehicle rental, and airlines serving Cold Bay. There is no evidence suggesting Coho salmon runs in Cold Bay area are in decline. Contrary, current evidence indicates that runs are strong there is no reason to hurt local businesses and Alaska tourism.

3) Returns of Sockeye salmon in Mortensens Lagoon appear to have declined dramatically the past few years. Excessive commercial harvest has been suggested as the reason, but cannot be substantiated. Subsistence harvest of Sockeye salmon is important to the local community. The fishing pressure has shifted from Mortensens Lagoon to Swan Lake. The sport take of Sockeye Salmon is very limited and primarily by locals. Sportsmen and women outside the Cold Bay region focus on Coho. The largest impact on Sockeye populations is subsistence harvest. Limiting sport catch without addressing subsistence harvest would do very little for managing Sockeye runs.

Michael Gregg
Cold Bay, Alaska

PC63

Submitted by: Jared Gregorio

Community of Residence: Chignik Lagoon

Comment: I'd like voice my opinion.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

PC64

Submitted by: Daniel Grunert

Community of Residence: Chignik Lagoon, Alaska

Comment: I am a Chignik fisherman and I oppose proposals 105 and 132 for the following reasons, the proposals would not be in favor of conserving the two distinctly different salmon runs and will bring more harm to an already endangered salmon stock; they ignore the fact that there are two different salmon runs which leads to believe there hasn't been meaningful thought and appropriate studies to what this could possibly do. The impression has been so far that there shouldn't be any drastic or hasty changes to our fisheries but these proposals seem quite the opposite. Thank you for your time.

F/V Adventuress

Dan Grunert

Clem Grunert

Mary Grunert

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 105: Oppose **Proposal 132:** Oppose

PC65

Submitted by: Jennie Grunert

Community of Residence: Chignik Lagoon, AK

Comment: I support proposal 140. I feel this proposal will help with the conservation for many rivers that have a salmon stock of concern in Western Alaska. There has been very little genetic testing done by ADF&G and the board needs to act if we want to have healthier runs in the future. Any reduction in time and area of Area M to help fish get to their spawning grounds is essential. However, in 2019 when you reduced a small 32 hour closures to try to get fish up the Chignik River, it did very little for our escapement. More needs to be done and it needs to be done now. Thank you for your time.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 133: Support **Proposal 140:** Support **Proposal 150:** Support

PC66

February 4, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, and personal use fisheries. I was born and raised in Sand Point; my lineage is from here. I have participated in fishing since I was born. Salmon fishing in the South Alaska Peninsula region is very important; commercial fishing is important to me because this is my job. My family has been fishing in the waters of Area M for the past 100 years. I have taught my children how to fish to support their families. Subsistence fishing is how I feed myself and my family.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Michael Gundersen
holdfast3001@gmail.com
(907) 386-6074

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC67

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is very important. Commercial salmon fishing is my livelihood.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Kevin Gundersen
thompsonsdp@aol.com
(907) 383-5274

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC68

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I work in local business supporting fisheries, where I sell goods from the AC Store to help the crews. Salmon fishing in the South Alaska Peninsula region is very important. I feel the fisherman are a huge role in financial stability of our town.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Mattheu Hales
MattheuHales@icloud.com
(337) 476-0437

PC69

Submitted by: Peter Hamre

Community of Residence: Anchorage

Comment: I would like to voice my opposition to proposals 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150, which are all attempts to shut down or hamstring fishing in the South Alaska Peninsula during June and July.

A third generation Alaskan, I own and operate a seiner in Area M, and have seen firsthand, in my relatively short, 14-year career, how rapidly the ocean is changing. On the first year of the "blob" we saw huge flocks of dead sea birds, starved to death. Meanwhile, marine mammals of all types were washing up on the shores of Western Alaska in troves. In 2019, there were so many jellyfish in the water (a worldwide effect of warming oceans) that we were unable to keep our nets from sinking – none of the elder fishermen had ever seen anything like it. A recent study presented at the Yukon BOF meeting explains in painstaking detail, how outmigrating chum salmon had nothing to eat because of the poor ocean conditions – 60% of their forage were nutrient-poor jellyfish. Starved fish, mammals, and birds, with empty bellies.

The WASSIP study, along with recent genetic sampling, shows that Area M doesn't intercept even one 20th of the fish we've seen disappear from the Yukon the last few years. What we're talking about is destroying six communities, when it's not even going to start addressing the problem. And political forces don't seem very interested in going after other interceptors, such as Bering Sea trawlers, or the Bristol Bay fleet, who, since they don't sort their catch, probably aren't reporting accurate chum harvests. To be clear though, we don't want to throw anyone under the bus, we just want science and common sense to guide the process.

The decline of chums has wreaked havoc on the culture and lifestyle of people up and down the Yukon, and I understand and empathize with why they want action from this board. The question you need to ask yourself is, can we fill a millions-of-fish hole with the single-digit percentage that are caught in Area M, and is that worth the decimation of these communities, and the livelihoods of people like me and my crew? I can understand a desire to want to help fix the problem, but if we're being honest here, this problem is way over the power of the Board of Fisheries – this is about global climate change, and it's time we start talking about the elephant in the room.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 152: Support

PC70

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is important because it's a way of living and a source of income.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Charlotte Hansen
hansenchar@hotmail.com
(907) 497-7013

PC71

February 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I participate in commercial fisheries. Salmon fishing in the South Alaska Peninsula region is important to me because it is my livelihood to me and my family and has been for generations. I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Kurt Hastings
KURTHASTINGS82@GMAIL.COM
(907) 538-2254

PC72

Submitted by: Reanna Heuker

Community of Residence: Warrendale, OR

Comment: I support proposal 120 to modify the fishing periods in the northern district of Area M. Nelson Lagoon is facing a fishery disaster and are in desperate need of help from fishery management to implement windows in the northern district intercept fishery to help the Nelson River rebuild their future fish runs.

In 2013-2018 when rolling closures were put into effect in the northern area M sections, Nelson Lagoon saw its biggest years of escapement on record according to data provided on the ADF&G website. In 2019, when rolling closures were no longer in regulation there was a dramatic drop to the escapement count for the Nelson River. Having rolling closures/windows reimplemented into the fishery will only help rebuild our fisheries stock, and allow there to be returning runs for years to come.

I have fished in Nelson Lagoon since I was 11 years old with my siblings and cousins. We are all active permit owners and have grown up fishing in Nelson Lagoon for the last 15 years. It has been apart of our family for over 25 years and in the last 15 years of fishing in Nelson Lagoon we have never experienced such a devastating year as lasts, with both harvest levels and weir counts at a fifty year low. It is sad to see this happen to such a unique fishery and we hope that there can be some resolution by fishery management to better control the regulations of the Northern District Area M fishery.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 120: Support **Proposal 128:** Support

PC73

January 20, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in False Pass, Alaska and I participate in commercial, subsistence, and personal use fisheries. I am the City of False Pass Mayor & Administrator as well as a fisherwoman. Salmon fishing is at the heart of why False Pass exists. Everyone depends on it and without it, we cannot see a future.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Nicole Hoblet
nicaloos@gmail.com
(907) 548-4017

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC74

January 23, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in False Pass, Alaska and I participate in commercial, subsistence, and personal use fisheries, as well as in local business supporting fisheries. All species of seafood available in our region for millennia are used every day for teaching, feeding and supporting our community and culture. I have fished commercially and for subsistence. I work for a business that directly supports all fisheries in our area, especially June salmon. My family and I have relied on our summer salmon season for decades if not a century at least to feed us, whether by subsistence or the money earned commercially for other necessities. We have endured the ups and downs of annual salmon runs due to global warming and other trends that affect our stock. The science DOES NOT SUPPORT any claims by other areas of Alaska that our "bycatch" would decimate their stock. In the million miles of open ocean where most of our fleet fish the probability of our season/catch affecting their stock is negligible.

Salmon fishing in the South Alaska Peninsula region has been our way of life for decades, probably more like a century at least. The restrictions put on our fishery (in the past and the proposed in the future) only stands to hurt our region economically for the sole reason that we don't have the number of residents (votes) that elected officials like to support to keep them in office. This is purely political and not fact-based accusations.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn’t support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Melanie Hoblet
m_hoblet@hotmail.com
(907) 548-4090

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC75

January 25, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in False Pass, Alaska and I participate in commercial and subsistence fisheries. I serve as the Tribal Administrator for the Native Village of False Pass. I have spent my entire life rooted in fisheries, both commercial and subsistence, and I know first-hand their importance. However, I also value science and research. Study after study has shown that the crash in AYK stocks is not related to the Area M salmon fishery. We owe it to ourselves and to our children to discuss this issue with our eyes wide open to the facts, not blinded by fear and blame. While the decline in AYK salmon stocks is scary and threatening, it makes no sense–not scientifically, not economically, not culturally–to shut down the Area M fishery in an effort to somehow "save" the fisheries in the AYK. To me, this action looks and feels diametrically opposed to our culture and values.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Lena Hoblet
aloy9113@pacificu.edu
(907) 444-5689

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC76

Submitted by: Tom Hoblet

Community of Residence: False Pass, Alaska

Comment: Chairperson members of the board.

Thanks for the opportunity to comment on the South Alaska Peninsula fin fish proposals.

I've fished in Area-M for over 60 years and still do as time permits.

I'm opposed to all proposals to further restrict the south peninsula June fishery. This includes proposals 106,109,119,120,126,128,133,134,135,136,137,138,139,140,141,142,143,148,149,150.

I think the Alaska peninsula fishery in Area-M has shared in the burden of conservation more than any other fisheries, closer to the problems in the AYK region.

I'm in support of proposals, 107,108,110,112,115,116,130,131,144,145,146,152.

These proposals to further restrict the June fisheries in the south peninsula will create hardships for all communities in the aleutians east borough.

False Pass is totally dependent on this Fishery, by way of taxes to the city government, keeping our school open, sales of goods and fuel sales.

There is a great possibility of this community to be non existent if we are further restricted by fishing time, and area.

Thanks ,Tom

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC76

February 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in False Pass, Alaska and I participate in commercial and subsistence fisheries. I've been a commercial and subsistence fisherman for over 60 years in the Area M fishery and I still do it today. Salmon fishing in the South Alaska Peninsula region is very important.

Sincerely,

Tom Hoblet
ghthwd@gmail.com
(907) 548-4013

Submitted by: Lena Hoblet

PC77

Community of Residence: False Pass, AK

Comment: I was born and raised in the Interior, in the Arctic-Yukon-Kuskokwim (AYK) region, to be exact. I grew up in a community that depends on subsistence fishing, and my childhood memories are dominated by recollections of my father, my mother, and countless other members of my family and broader community going out on boats and bringing back the fish that our people have harvested and survived on for generations. I grew up fishing for subsistence, and I know how deeply important it is not only for physical survival but for the survival of our cultures and the identities of Native people across Alaska.

I have lived in False Pass seasonally over the past ten years and have raised my kids there. They have been raised to know subsistence and value it. They have created their own memories, both in False Pass and in the AYK region with my family. I have seen the harvests change in my lifetime, from years of abundance to some years where there is nothing at all, and I am brokenhearted by the impossible situation many communities in the AYK–including the one I grew up in–find themselves in with increasingly diminished salmon runs. However, I know that shutting down the fishery often referred to as Area M that my community and many, many other communities in Western Alaskan depend on will not solve any of the problems the AYK is facing. Instead, it will cause more communities to suffer. We know this because every major research study and dataset demonstrates that limiting or shutting down Area M fisheries will not solve the salmon return crisis in the AYK. This conclusion is also that of the Department of Fish and Game (ADF&G), supported by both NOAA and ADF&G studies demonstrating the impact that 5+ years of poor ocean conditions have had on AYK chum salmon.

I have spent my entire life rooted in fisheries, both commercial and subsistence, and I know first-hand their importance. However, I also value science and research. Study after study has shown that the crash in AYK stocks is not related to the Area M salmon fishery. We owe it to ourselves and to our children to discuss this issue with our eyes wide open to the facts, not blinded by fear and blame. While the decline in AYK salmon stocks is scary and threatening, it makes no sense–not scientifically, not economically, not culturally–to shut down the Area M fishery in an effort to somehow "save" the fisheries in the AYK. To me, this action looks and feels diametrically opposed to our culture and values.

We must model respectful behavior for our children–the behavior they are currently seeing is not indicative of who we are as people, as Alaska Natives and Alaskans in general. This infighting, this baseless blame–it is completely antithetical to the values we all hold dear and do our best to live by. This culture of Alaska Natives, which has been adopted more broadly by all of Alaska, is rooted in community, sharing, resiliency, and tenacity–because without each other, without trust and common ground and willingness to come together, no one would survive here.

This is our home. We can do better than this. We must do better than this. We can fully embrace the values that have allowed our people to survive and thrive since time immemorial and stop this insidious exercise in blaming our neighbors. As a woman raised in AYK and now living in the Aleutians, I state this with conviction. We are all trying to survive and feed our families; to help our babies thrive. Shutting down the Area M fishery will not bring back the AYK salmon abundance of years past–but it will inflict pain and suffering on families and communities that have nothing to do with this crisis.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC78

February 2, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in Sand Point, Alaska and I participate in commercial fisheries. I was born and raised in the Shumagin Island and bought my first commercial fishing boat right out of high school in 1977. I still participate in this salmon fishery in Area M which provides revenue for the City of Sand Point and the Aleutians East Borough. Salmon fishing in the South Alaska Peninsula region is vitally important to keep my fishing operation going and it provides income for me and my family and my crew. The salmon fishery also provides revenue to the City of Sand Point and villages in the Aleutians East Borough as well as infrastructure to the salmon fishery.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Paul Holmberg
seakingpaul@gmail.com
(907) 232-4252

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC79

January 20, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in Sand Point, Alaska and I participate in commercial and subsistence fisheries, as well as in a local business supporting fisheries, a car rental and cafe. Salmon fishing in the South Alaska Peninsula region is very important; it has been my livelihood for past 50 years.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Sincerely,

Arthur Holmberg
artholmberg@gmail.com
(907) 306-6830

PC80

Submitted by: Edgar Shangin - Ivanof Bay Tribe

Community of Residence: Anchorage, Alaska

Comment: see attached

oppose 105 & 132

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 105: Oppose

Proposal 132: Oppose

PC80

US Army Corps of Engineers®

Planning Assistance to States Technical Report

Black Lake Technical Assistance Ivanof Bay Village, Alaska

JULY 2022

Planning Assistance to States Technical Report

Black Lake Technical Assistance
Ivanof Bay, Alaska

Prepared By:

U.S. Army Corps of Engineers
Alaska District

July 2022

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1.0 INTRODUCTION

1.1 Project Description and Authority

The Chignik fishery is of critical importance to local subsistence and commercial fishermen as well as area wildlife. The non-Federal sponsor for this study (Ivanof Bay Tribe) is concerned about decreasing sockeye salmon (*Oncorhynchus nerka*) returns to the Chignik watershed, and that at least one cause may be that salmon productivity of the Chignik watershed is negatively impacted by habitat changes in Black Lake. This project is a Planning Assistance to States (PAS) study performed in general accordance with the authority described below.

Section 22 of the Water Resources Development Act of 1974, as amended (42 U.S.C. 1962d-16), authorizes the Secretary of the Army to provide technical assistance related to the management of State water resources (hereinafter “Technical Assistance”) to a State or non-Federal interest working with a State and to establish and collect fees for the purpose of recovering 50 percent of the costs of such assistance except that Secretary may accept and expend non-Federal funds provided that are in excess of such fee; Section 1156 of the Water Resources Development Act of 1986, as amended (33 U.S.C. 2310) provides a cost sharing waiver of up to $511,000 for the Non-Federal Sponsor.

1.2 Problem Statement

Adult sockeye salmon annual return numbers to the Chignik watershed, which includes Black and Chignik lakes, have been inconsistent from year to year, but overall the annual returns have been decreasing in recent years. The cause or causes potentially reducing salmon returns to the watersheds are complex, and include, but may not be limited to the following:

1) Watershed geomorphic changes, especially within the Black Lake watershed, could be influencing the availability and suitability of spawning and/or rearing habitat.

2) Unfavorable ocean conditions could be negatively impacting subadult and/or adult survivability or result in younger year class and smaller fish returning, which may suggest a food source issue in the ocean.

3) Climate change could be influencing both the watershed and ocean habitats.

4) Illegal and/or legally managed commercial ocean harvest directly reduce returning adult populations to the watershed.

The four causes listed above may not be complete in that there may be additional unknown causes that reduce salmon returns to the watershed. However, the unknowns and items 2-4 above take place in the ocean and are beyond the focus or ability of this

PAS study and USACE to evaluate in detail. As a result, this PAS study focuses on the concern that geomorphic and hydrologic changes to the Black Lake watershed may result from a shift of the Alec River inflow location that favors larger flows discharging into the west end of Black Lake. This shift of the inflow location and associated sediment load into Black Lake is a concern because it may potentially result in a shallower lake that will more frequently have unfavorable warmer salmon rearing habitat.

A shallower Black Lake with warmer water temperatures may cause a larger percent of the salmon fry to migrate earlier in the summer than typical to the colder water in the deeper Chignik Lake to continue development. Since the Black Lake watershed is larger and more productive, the concern is that this early influx of smolt in to Chignik Lake has the potential to increase food competition between the two runs of distinct sockeye salmon stocks from in the Black Lake and Chignik Lake watersheds during their juvenile life history. This competition for food could result in a lower abundance of the late-run Chignik Lake stock and an overall loss of productivity in the entire Chignik watershed (Freundlich & Schindler 2021).

1.3 Purpose and Objectives

The purpose of this PAS study is to provide information to the Ivanof Bay Tribe on the effects of ongoing or perceived geomorphic changes to salmon habitat in the Chignik watershed. The objective is to provide technical assistance related to the management of water resources, specifically addressing the risk to salmon productivity associated with the Alec River discharge location into the Black Lake and associated potential changes in sediment deposition and erosion in the lake and the Black River.

1.4 Scope of the Study

To achieve the objectives, the Army Corps of Engineers (USACE) completed the scope below:

- A background review of applicable previous technical reports prepared by USACE and others
- A field visit was conducted by USACE personnel Geologist/Project Manager (Leif Hammes), Biologist (Chris Hoffman), and Hydraulic Engineer (Olivia Jobin) on 8 September 2021
- Coordinated and hosted a workshop that included tribes, agencies researchers and stakeholders' workshop to discuss the problem, causes, and available traditional knowledge, existing monitoring data, observations for the past decade, identify data gaps, and potential solutions.
- Summarize the physical geomorphological change in Black Lake and fishery issues

1.5 Study Location

Black Lake is a relatively large, shallow lake on the Alaska Peninsula in southwestern Alaska within the Lake and Peninsula Borough. It is drained by the Black River, which discharges into Chignik Lake about 7.5 miles downstream (Figure 1). Chignik Lake is

PC80

drained by the Chignik River, which ultimately discharges into Chignik Bay of the North Pacific Ocean. The closest community to Black Lake is Chignik Lake, which is approximately 13 miles southeast of the outlet of Black Lake and 400 miles southwest of the City of Anchorage.

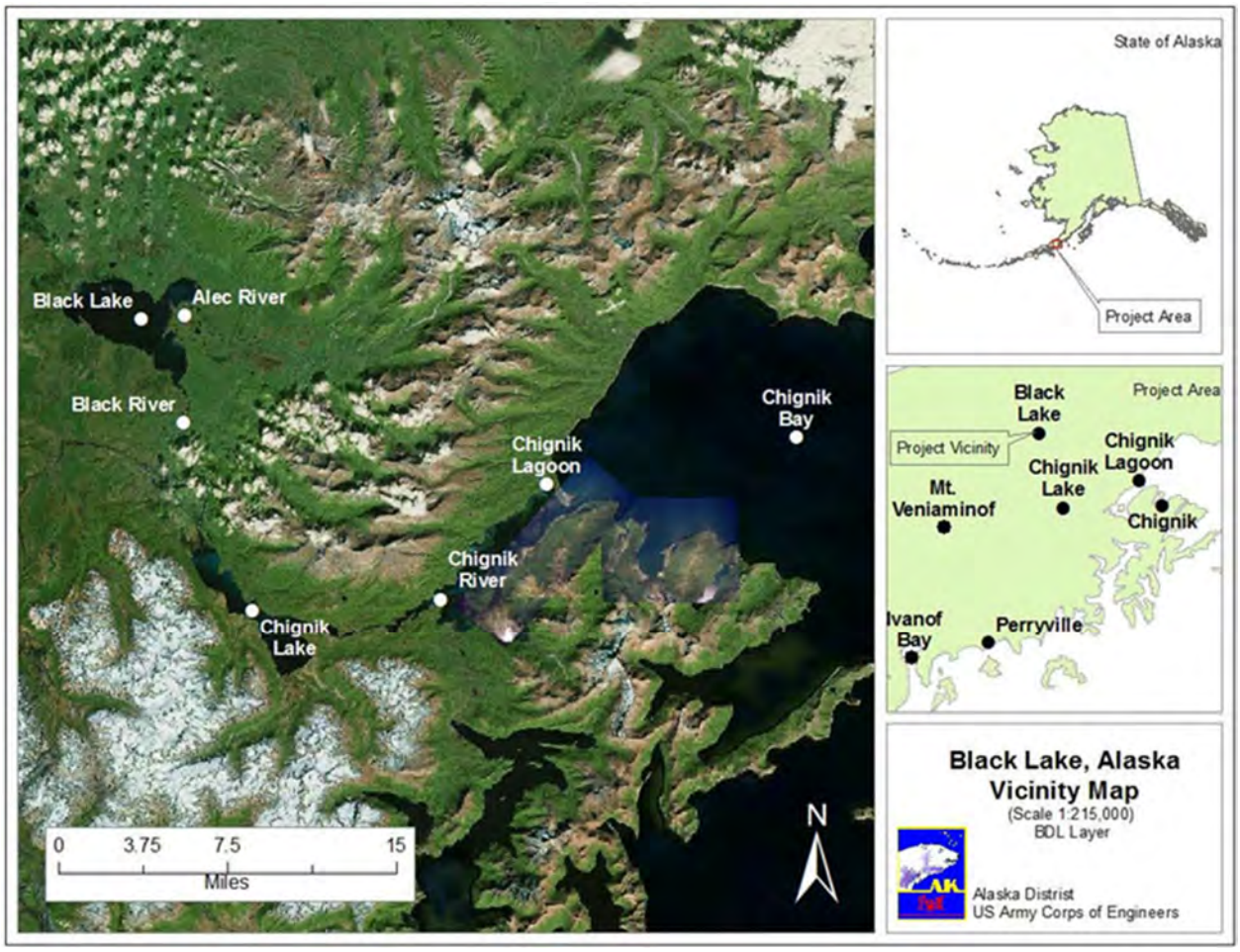

Figure 1. Vicinity Map

1.6 Stakeholders

Stakeholders that were identified in a previous study (USACE 2012) or during this study that may have interest in this report are listed below:

- The Lake and Peninsula Borough
- Federally Recognized Tribes: Chignik Lake Village, Native Village of Chignik Lagoon, Ivanof Bay Village, Chignik Bay Tribal Council, Chignik Bay Tribal Council (previously listed as the Native Village of Chignik)
- Chignik Intertribal Coalition
- Chignik Aquaculture Association
- Federal Agencies: US Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) Fisheries
- Alaska Department of Fish & Game (ADF&G)

- University of Washington Fisheries Research Institute (UW-FRI)
- Alaska Native Claims Settlement Act of 1971 (ANCSA) Corporation: Bristol Bay Native Corporation (BBNC), Cook Inlet Region, Inc. (CIRI)

1.6.1 The Lake and Peninsula Borough

The Lake and Peninsula Borough is located along the Alaska Peninsula and encompasses approximately 23,782 square miles of land (roughly the size of West Virginia) and 7,125 square miles of water. The Lake and Peninsula Borough was incorporated in April 1989 as a Home-Rule Borough with a manager form of government. A seven-member assembly acts as the legislative body for the borough. The borough is predominantly rural and contains 17 communities, six of which are incorporated as second-class cities. Village or Tribal Councils govern the remaining 11 communities (http://www.lakeandpen.com).

1.6.2 Local Communities

Five local communities, all Federally recognized tribes, within the Lake and Peninsula Borough (see Figure 1) rely upon Chignik fishery resources as a source of income and subsistence food. Populations in Chignik Bay and Chignik Lagoon nearly quadruple in size in the summer months due to the influx of Chignik commercial fisherman, employees of fish processing facilities, and local family summer residents. These communities and total populations as of July 1, 2021 are listed below:

City Name	Total Population
Chignik Lake	71
Chignik Lagoon	76
Chignik	88
Perryville	110
Ivanof Bay	7

1.6.2.1 *Chignik Regional Aquaculture Association*

The goal and mission statement of Chignik Regional Aquaculture Association (CRAA) is as follows:

> *"The long-term goal of the Chignik Regional Aquaculture Association (CRAA) is to increase local salmon production. In accordance, CRAA is committed to protecting, enhancing, and rehabilitating Chignik salmon resources and improving commercial fishery management and stock utilization.*
>
> *CRAA is committed to ensuring that traditional subsistence resources and opportunities are protected and maintained for the people of Chignik Lake, Chignik, Chignik Lagoon, Ivanof Bay, and Perryville.*

PC80

Additionally, CRAA will support product promotion, fair marketing, and harvest strategies that advance the economic foundation and commitment to the Chignik salmon fishery."

CRAA board members represent local commercial, sport, and subsistence fishermen, as well as local governments, tribes, and seafood processors. CRAA has frequently served as the point of contact between USACE and the local sponsor throughout this study.

1.6.2.2 *Alaska Department of Fish & Game Division of Commercial Fisheries*

The Alaska Department of Fish & Game (ADF&G) Division of Commercial Fisheries manages subsistence, commercial, and personal use fisheries in the interest of the general wellbeing of the people and economy of the state, consistent with the sustained yield principle, and subject to allocations through public regulatory processes (http://www.adfg.alaska.gov).

Fishery resources of concern in this study are managed by ADF&G as part of the Chignik Management Area (CMA). The CMA includes the local communities of Chignik Lake, Chignik, Chignik Lagoon, Ivanof Bay, and Perryville. The major effort of ADF&G in the CMA is the day-to-day management of the Chignik commercial salmon fishery that occurs each summer. A seasonal fish weir is constructed each season adjacent to a field station located between Chignik Lake and Chignik Lagoon from which the commercial fishery is managed. ADF&G has been an active collaborator throughout the study.

1.6.2.3 *University of Washington Fisheries Research Institute*

The University of Washington Fisheries Research Institute (UW-FRI) was established in 1948 on the University of Washington campus as a base for salmon research in Alaska. They have maintained a research station, one of six in Alaska, at Chignik Lake since 1955. Early UW-FRI work in the Chignik Lakes formed the basis for current fisheries management in this region (http://fish.washington.edu/research/alaska/history.html#chignik). The UW-FRI has been an active collaborator throughout the study.

2.0 RELATED REPORTS AND STUDIES

The USACE previously completed a Continuing Authorities Program (CAP) Section 206 study concerning the Black Lake ecosystem (USACE 2012). This study investigated the physical and biological conditions at Black Lake and whether reductions in depth and lake volume would result in harmful and unrecoverable impacts to the salmon that utilize the habitat in Black Lake. This study concluded that the physical changes (lower water levels) observed in Black Lake could be in response to geomorphic changes in the river that drains it (Black River). Structural measures to control lake water levels were discussed in this technical report (USACE 2012), but the risk to salmon due to lower

water levels did not appear imminent based on indications that a new state of equilibrium in Black Lake may have already occurred. Recommendations included additional monitoring of lake levels and channel changes in the upper portion of the Black River and annual assessment of sockeye salmon smolt production in the Chignik system. If the depth and water volume trends show a decreasing trend in Black Lake, and negative impacts to salmon smolt production is demonstrated, this data could be considered to evaluate the need for measures to alleviate negative impacts to salmon production.

There are numerous reports and studies prepared by others that have contributed significantly to the Black Lake ecosystem knowledge base. These reports and studies are referenced or cited throughout this report.

3.0 EXISTING CONDITIONS SUMMARY

3.1 Black Lake Watershed

The Black Lake watershed has had minimal anthropogenic activity within the watershed that influences water levels and/or water quality. The watershed area totals approximately 408 square miles , with 102 square miles associated with the Alec River drainage (Figure 2). Fan Creek is a sub-watershed that flows into the Alec River just upstream from Black Lake. Together the Alec River and Fan Creek contribute approximately 68 percent of the water flowing into Black Lake, with the remaining 32 percent coming from western Black Lake watersheds (USACE, 2012) (Figure 2). Black Lake is a large, shallow lake that has been studied for several decades because of its vital salmon rearing habitat in the watershed. In round numbers, the lake depths range from 6 ft. to 26 ft. with seasonal variations of approximately 4.5 ft. (Figure 3). Two sand spits have formed from sedimentation that has occurred at the outlets of the North and South Alec River channels (Figure 4).

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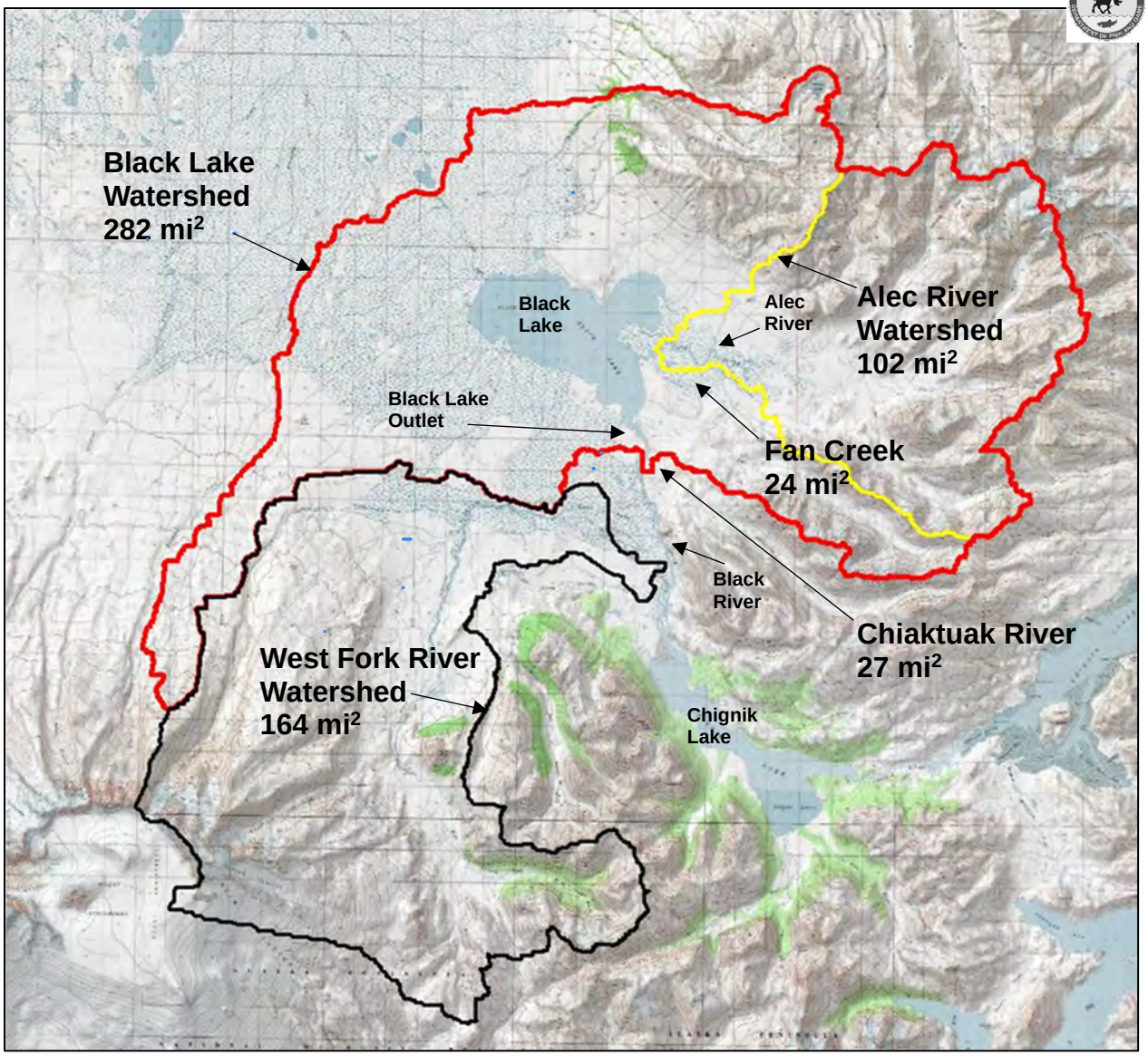

Figure 2. Major Drainage areas of the Chignik and Black Lake Systems (USACE, 2012)

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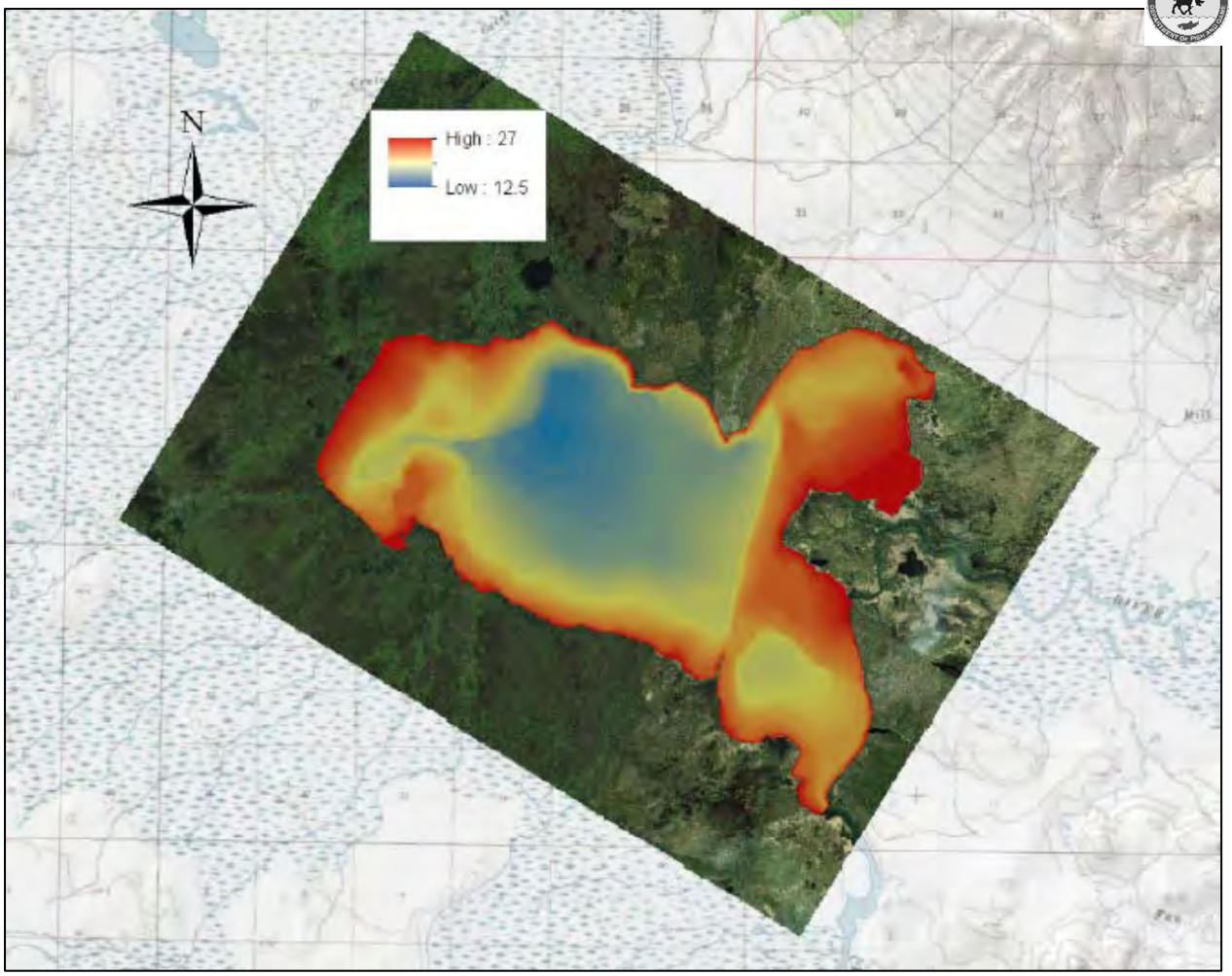

Figure 3. Black Lake Bathymetric Map from 2011 Survey (units of ft.; USACE, 2012)

Naturally occurring fluvial geomorphological changes within the Black Lake watershed have occurred over time. The West Fork River migrated roughly three miles south in the late 1960s or early 1970s. This shift has led to concerns about downcutting within the Black River and decreasing water levels in Black Lake. Decreasing water levels could result in warmer water temperatures which can negatively impact the salmon rearing habitat in Black Lake and cause early emigration of the smolts from Black Lake to the cooler waters in the deeper Chignik Lake. The North Alec River channel that discharges into Alec Bay (Figure 4) used to contain much of the flow from the Alec River, but over time this has changed. Now much of the flow from the Alec River goes to the South Alec River channel and discharges into the southern portion of Black Lake near the outlet (Figure 4). This change has led to concerns about potentially reducing the volume of sediment that enters Alec Bay, as well as how the increased inflow to the southern portion of Black Lake may affect the southern sand spit over time.

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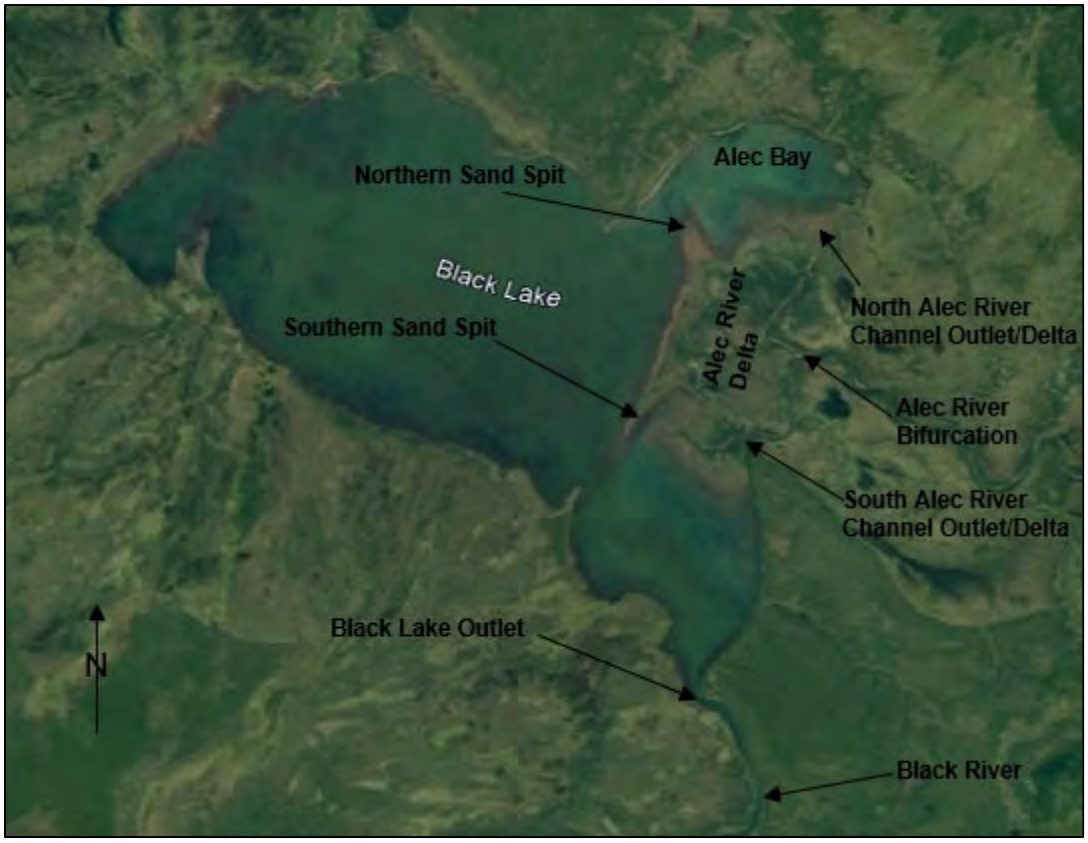

Figure 4. Black Lake and Alec River Components (Google Earth Imagery, 2022)

In 2012, the USACE evaluated discharge from the watershed and investigated questions stakeholders had about the changing fluvial geomorphology and its potential impact on the lake over time (USACE, 2012). These same questions are discussed in more detail in the following sections.

3.2 Fisheries Resource

The Chignik system provides habitat for two sockeye salmon runs, an early-season and late season run. The principal nursery or rearing area for a large portion of the young-of-the-year (YOY) sockeye salmon fry in the Chignik system is Black Lake, which receives the early-season run of spawning adults. Decreasing water levels or unusually warm summer weather, can result in warmer water temperatures than normal in Black Lake. These warmer water temperatures may cause premature emigration of early-season YOY fry into the deeper and colder waters of Chignik Lake. Chignik Lake is considered inferior early-spring rearing area for sockeye salmon relative to Black Lake. A large influx of YOY sockeye salmon fry into Chignik Lake may also pose a risk to Chignik sockeye salmon fry, which is derived from a late season run, because of the potential for increased food competition between these two stocks early in their life cycle. In recent decades, the two stocks did not typically interact within Chignik Lake until mid to late summer (Griffiths et al., 2013). Ongoing climate change may also be altering both the seasonal flow regime and the water temperatures in this watershed, which could further modify suitability of habitat.

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4.0 PHYSICAL GEOMORPHOLOGICAL CHANGE ASSESSMENT

Three physical geomorphological change assessment questions or concerns were discussed in the USACE 2012 study. These three questions focused on Black Lake depth and water temperature trends, the mechanism that impacts water depth, and how these mechanisms or geomorphic processes isolate the habitat between Black Lake and the outlet area. These same questions are summarized and updated below considering additional data, if available.

1. ***Will Black Lake continue to become shallower and warmer?***

The gage of record, which was installed in Black Lake and operated from October 2010 to September 2012 (USGS Gage 15297584), shows that Black Lake water levels fluctuate up to 4.5 ft. on an annual basis. This period of record displays similar trends to those reported in historical documents. Lake levels rise during the spring snowmelt and then generally decrease throughout the summer, interrupted periodically with steep rises in water levels during large fall storms.

Daily water level fluctuations due to wave set-up within Black Lake are also seen. This wave set-up phenomenon is important when measuring lake water levels or when comparing historical aerial photographs. Weather conditions can change the water surface of Black Lake at a particular location within a range of approximately 3 ft. (±1.5 ft.). The fact that Black Lake is subjected to weather and climate induced variations in water surface elevation (WSE) on variable time scales further complicates the comparison of historical WSE measurements.

A bathymetric survey of Black Lake was performed in 2011 and provided the elevation of the lake bottom, based on a local datum, as opposed to determining depths based upon the WSE at the time of the survey. A bathymetric contour map, stage (WSE) versus volume, and stage versus surface area curves were generated from the data collected. These showed that at a WSE elevation of 26 ft., the average depth of the lake is 6.3 ft. with a maximum depth of 13.6 ft.

To examine trends in WSE, changes in vegetation around the perimeter of the lake were used as a proxy for changes in the average WSE. To relate changes in vegetation to changes in average lake stage, two key assumptions were made: that vegetation around the lake responds to changes in average lake WSE and that the bathymetry of the lake remains relatively constant. A series of seven aerial and satellite images were examined for the 2012 technical report from 1957 to 2010 with an estimate of the perimeter vegetation line established for each image. The polygon area was then calculated, and an elevation assigned based on the surveyed surface area versus elevation curve. The elevation calculated cannot be considered a water surface elevation but rather a proxy for the average water surface. The values were then reduced by subtracting the median of the range measured. The results indicated that over the 50-year period of analysis, the average lake WSE decreased by approximately 1 to 2 ft. This corresponds to an average volume decrease between 17 and 30 percent.

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This analysis did include changes due to delta progradation at the mouth of the Alec River where there have been significant changes, therefore the actual changes in average annual water surface elevation are likely less than this estimate since some of these vegetation changes are a result of the delta progradation and not from a lower lake water surface elevation. Though the average volume appeared to be declining, based on recent lake stage measurements, the WSE during significant runoff events can still reach historic levels.

One of the concerns for Black Lake was, an increase in water temperature due to reduced depth and volume could cause salmon and other species to seek refuge in cooler water, such as that provided by the deeper Chignik Lake. A hydrodynamic model (Griffiths et al., 2011) was used to understand the impacts of water temperatures based on changes in lake depth and volume. The model results showed that air temperature is the driving force determining water temperatures in large shallow lakes subject to high wind mixing, such as Black Lake. The model also predicted that small increases in WSE would raise water temperatures, likely due to the increase of residence time of water in the lake. With an increasing air temperature trend being seen since the late 1970s averaging 0.7° F per decade and expected to continue into the near future (USACE, 2015), it is likely that Black Lake will experience further increases in water temperature despite any changes in WSE.

2. What is the mechanism by which Black Lake is becoming shallower?

Sedimentation rates occurring in Black Lake from inputs from surrounding watersheds (primarily the Alec River watershed) for a 50-year period of analysis were estimated using lakebed sediment coring techniques in a study by Kaufman (2012). During this study, a set of five sediment cores approximately 1 meter in length were collected in Black Lake. The tops of two cores were sampled for plutonium content to locate the depth of the onset of nuclear weapons testing (1953) and the peak of plutonium production (1963). Two cores were analyzed for radiocarbon dating using Carbon-14 (C-14) by accelerator mass spectrometry at University of California, Irvine to generate a sedimentation-rate model that extends centuries to millennia, depending on core length and sedimentation rate. Results from the lake coring indicated that approximately 1 to 4 inches of sediment had accumulated in Black Lake since 1963. This resulted in a 1 to 5 percent decline in volume over the 50-year period of analysis. This represented a small proportion of the overall volume loss of 17 to 30 percent at Black Lake, based on the examination of trends in WSE from changes in vegetation around the perimeter of the lake previously mentioned. Results indicate that other mechanisms must be accountable for a majority of the lake volume loss.

An often-suspected cause of reduced WSE and volume in Black Lake is geological and hydrological changes in the Black River. The confluence of a sediment-laden tributary (West Fork River) to the Black River shifted downstream in the early 1960s (Buffington, 2002). Movement of the heavy sediment laden discharge and channel constriction of the tributary downstream in the Black River moved the Black River away from a state of equilibrium. Often, after such a disturbance, a river will respond by downcutting its

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channel until equilibrium is restored. Evidence of such downcutting was visible upstream from the current West Fork River confluence toward Black Lake during both USACE site visits from 2002 and 2021 (see Section 4.0 - Physical Geomorphological Change Assessment; 2021 Site Visit). The evidence is extensive with numerous perched side-channels, bank erosion, and calving as far upstream as the confluence of Chiaktuak Creek (Red Salmon Creek) with the Black River, approximately two miles downstream of the Black Lake outlet. Signs of channel degradation diminish upstream from the confluence of Chiaktuak Creek with no visible signs of channel degradation obvious at the outlet of Black Lake.

To better understand the Black River and how it controls the WSE of Black Lake, surveys of the river were conducted in 2004 and 2011. Prior to the USACE involvement, a survey was also completed in 1993 by CH2MHILL. The surveyed topographic data were used to develop a hydraulic model of the Black River to better understand responses in the lake WSE to changes downstream in the Black River. The model was built by the USACE for the 2012 technical report using the surveyed channel cross sections. Based on calibration and validation results, the model was considered suitable for examining the hydraulics of the Black River and responding channel changes at the outlet of Black Lake. Three separate reaches were identified in the model (5):

Reach 1 – Chignik Lake to the confluence of the West Fork
Reach 2 – Confluence with the West Fork to Chiaktuak Creek
Reach 3 – Chiaktuak Creek to Black Lake

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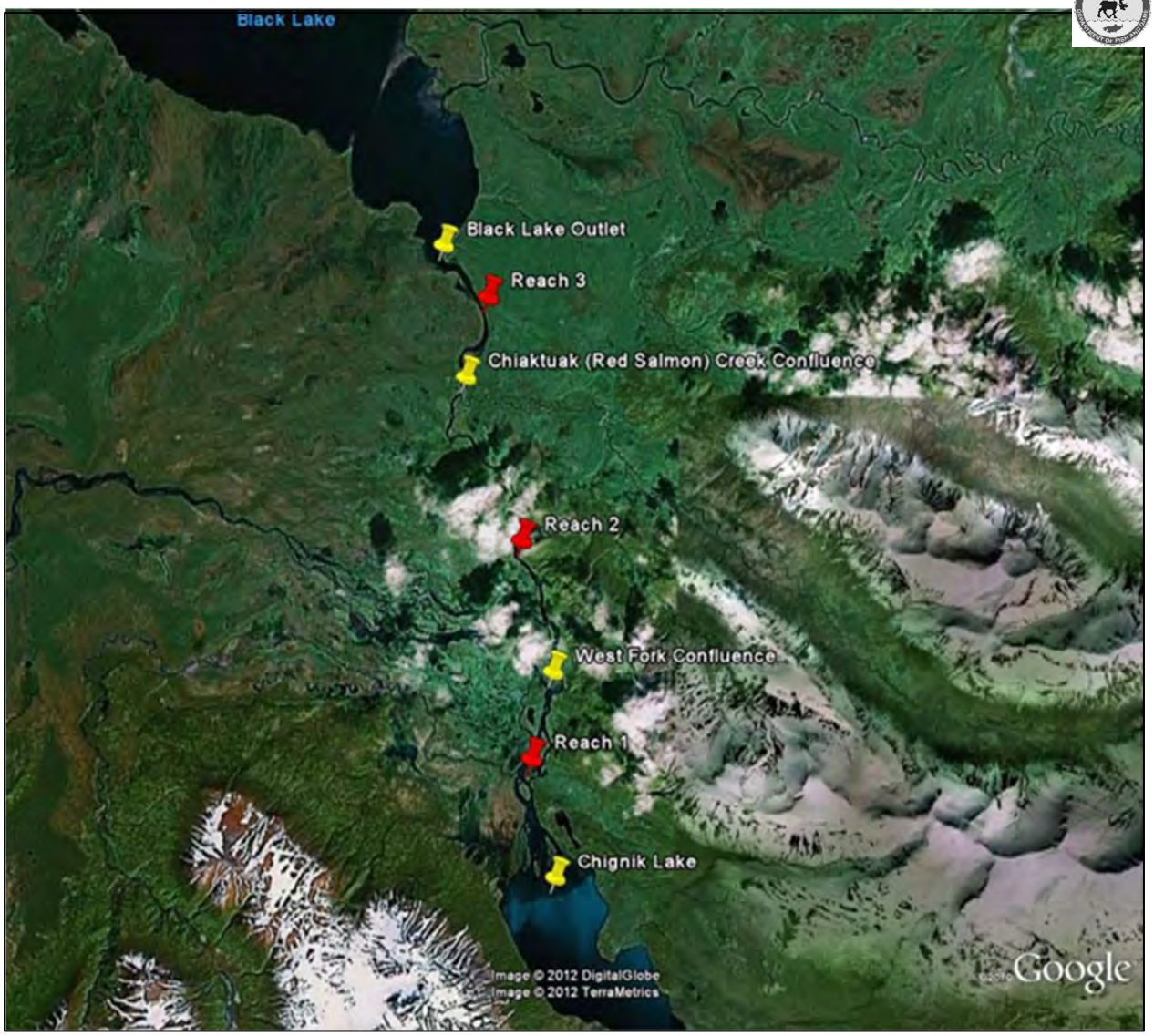

Figure 5. Black River Modeled Reaches

Based upon model results, it was believed that three mechanisms in the Black River were primarily responsible for the changes in the outflow of Black Lake:

1. A shift in the inflow location of the West Fork downstream, resulting in less flow within Reach 2 and reducing the upstream back water effect. This would affect upstream WSE.
2. Rapid erosion of sediment within Reach 2 after the removal of the West Fork sediment input along this reach after the West Form River migrated south in the late 1960s to early 1970s. Changes in the riverbed elevation within Reach 2 would likely affect upstream WSE.
3. Gradual long-term erosion within Reach 3 as channel velocities increase were the result of mechanisms 1 and 2. Lowering of the average riverbed elevations within Reach 3 would affect the WSE of Black Lake.

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Model results predicted that the shift of the West Fork River inflow to the Black River, as reported, would produce changes in the WSE of Black Lake without any changes required in the upper reach of the Black River. A significant portion of the changes were a result of the decrease in the volume of water within Reach 2 and erosion of sediment within the Black River when the upstream sediment supply from the West Fork River was removed. These results also explain the channel degradation that was visually observed within Reach 2 during the 2002 and 2021 site visits where the historic West Fork River channels are perched several feet above the Black River (see Section 4.0 - Physical Geomorphological Change Assessment; 2021 Site Visit).

Sediment grab samples collected along the Black River by USACE in 2011 indicate that Chiaktuak Creek is a source of larger-grained, erosion resistant streambed material. This was evidenced by the presence of armored point bars located immediately downstream of the confluence of Chiaktuak Creek and the Black River. While the Black River can transport finer-grained material at most flows, the larger-grained material is left in the bed as an erosion resistant feature. This agreed well with the visible downcutting in the upper extent of the Black River channel.

Model results and physical observations indicate that lower Black Lake WSE's are attributable to the shift in the location where the West Fork River enters the Black River. Cross section survey data collected in 2004 and 2011 indicate that while the trend in lower average lake WSEs may continue, the rate of change may be decreasing as the Black River approaches a new equilibrium following the shift in the West Fork River. It is to be expected that as the West Fork River continues to naturally migrate across its alluvial fan, that the water levels within Black Lake will fluctuate in response to the changing bed of the Black River.

3. Will geomorphic processes isolate habitat in the upper basin of Black Lake?

The U.S. Geological Survey (USGS) operated stream gages on the Alec and Black Rivers from May 2004 through September 2005 (Jackson et al., 2006). The data that was recorded indicates the Alec River contributes approximately 68 percent of the water flowing into Black Lake, predominantly through the north and south deltaic channels. The majority of the Alec River flows through its southern delta channel into Black Lake's Bay on the southern side of the southern spit, closest to the lake outlet (Figure 4). The northern delta channel flows into Alec Bay, which is the northeast corner of Black Lake (Figure 4). These inflows would likely be sufficient to ensure the southern spit remains open for the foreseeable future, even if all flows from the Alec River were to switch to its southern delta channel due to the 32 percent of flows into Black Lake that do not originate from the Alec River enter the lake to the west side of this spit. Major impacts to habitat access and water circulation from further extension of the spit are not anticipated, as the spit would remain open.

Different structural alternatives to raise the WSE in Black Lake were investigated during the USACE CAP feasibility study and all were deemed not viable for various reasons.

These included a control structure at the outlet of Black Lake, in-stream control structures in the Black River, a control structure in the Alec River directing more flow to the north channel, Alec River sediment traps, controlling beaver populations, and dredging Black Lake. Based on the report findings it was concluded that the best step forward would be a monitoring plan that included annual collection of Black Lake water surface elevation data, combined with periodic collection of cross section data from the Black River, and satellite or aerial imagery of the region.

UW-FRI Monitoring Reports

Since the 2012 USACE technical report on Black Lake, the University of Washington Fisheries Research Institute (UW-FRI) was contracted by the Chignik Regional Aquaculture Association (CRAA) to perform monitoring at the eight locations shown in Figure 6 (Freundlich & Schindler, 2021).

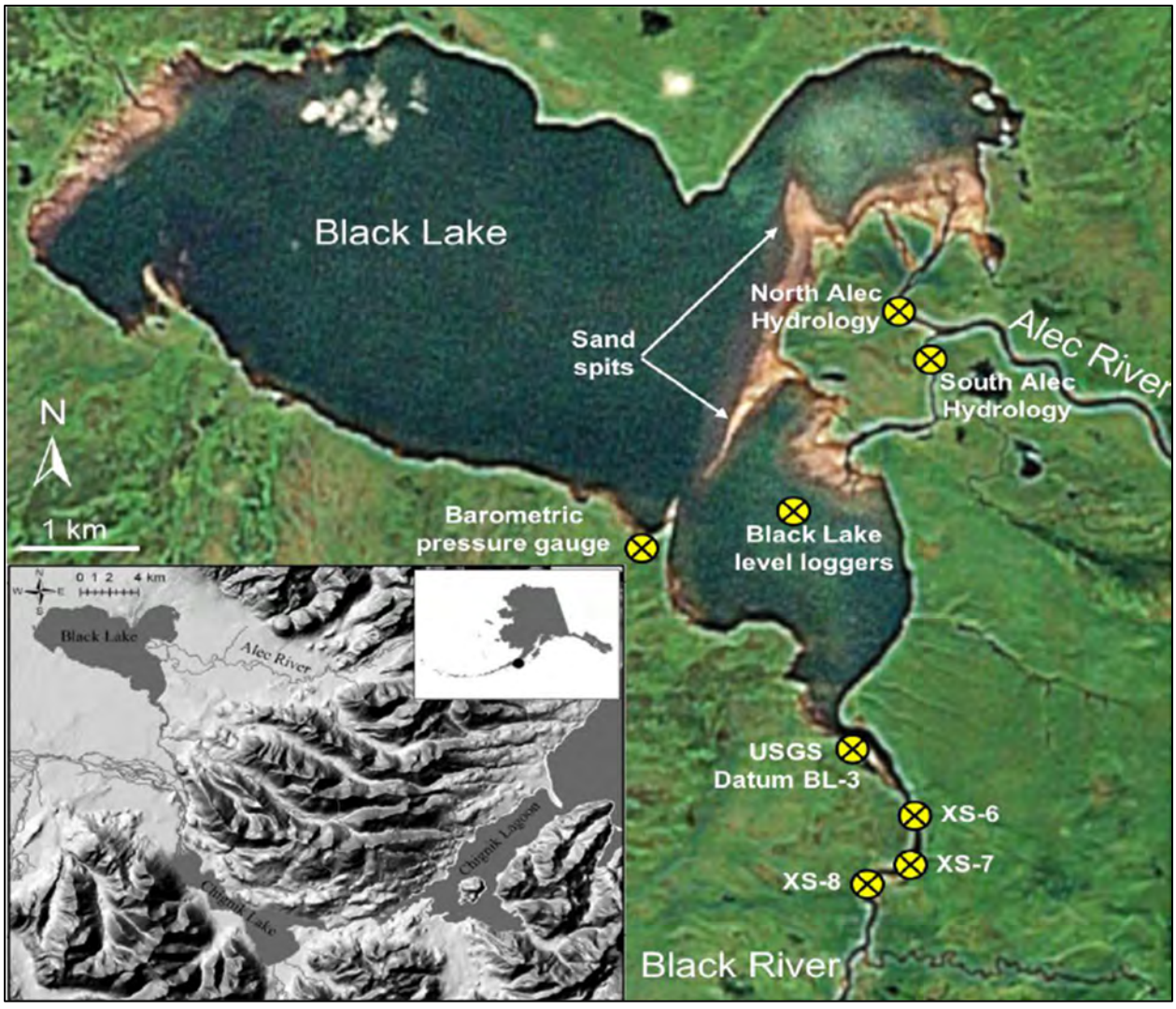

Figure 6. Alec River, Black Lake, and upper Black River with study locations marked (image: Landsat/Copernicus)

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The program has continuously monitored the Black Lake WSE since August 2012 for each field season (May through September) using two HOBO U20 Water Level Data Loggers (from 2010 to 2012 these measurements were from a USGS gage at the outlet of Black Lake) and synchronously measured the daily water temperature (Figures 7 and 8) (Freundlich & Schindler, 2021). Within Figure 7., the WSE was measured by the USGS gage at the Black Lake outlet until September 2012 (grey line) and corrected UW-FRI level loggers located in the Black Lake outlet bay from August 2012 until August 2020 (black line). The red line depicts the five-day moving average of WSE to negate the effect of wave action on WSE measurements. Dotted vertical lines highlight the May 1 – Sept 1 growing season for fish. Large flood (WSE > 26.5 ft.) peaks occurred on approximately May 28, 2011; January 30, 2014; February 28, 2014; November 21, 2014; January 8, 2016; October 14, 2016; December 30, 2017**;** and August 20, 2018.

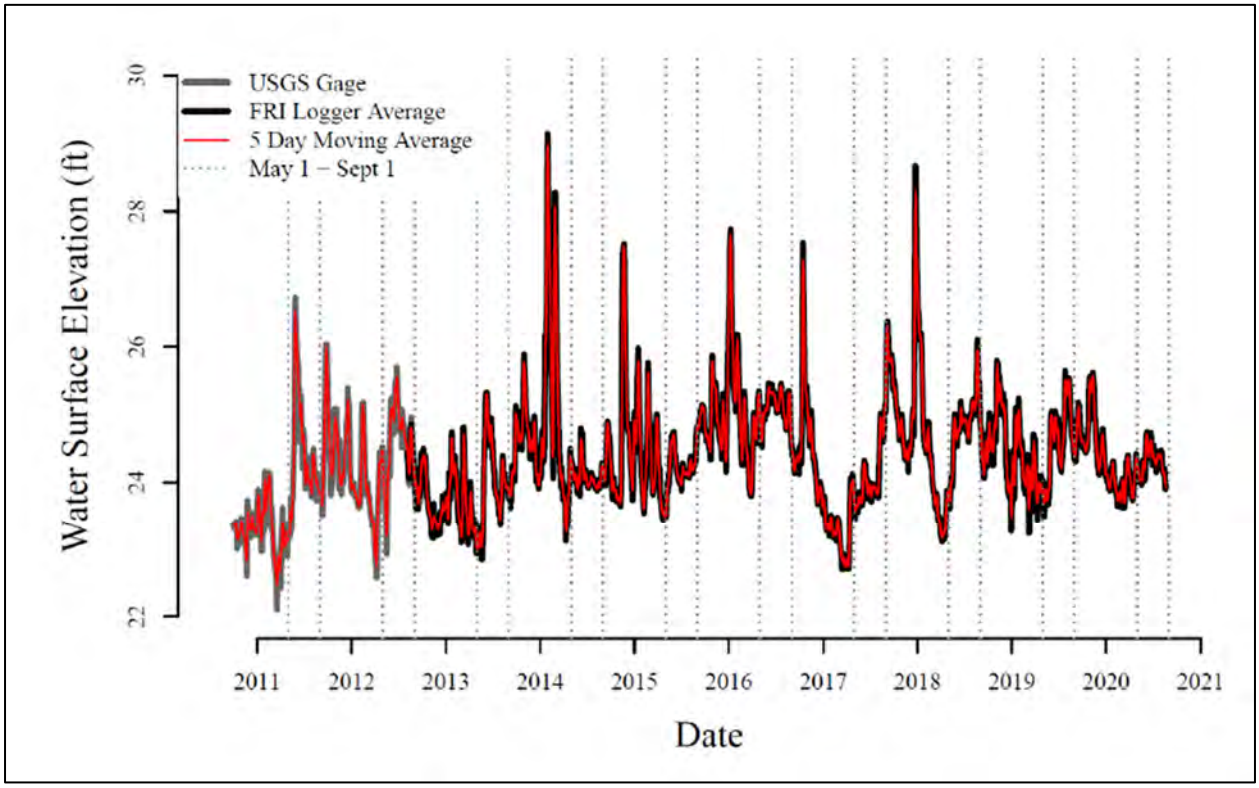

Figure 7. Black Lake WSE (units of ft. above mean sea level; Freundlich & Schindler, 2021).

Within Figure 8**,** water temperatures are measured by the same instrument that measures water level shown in Figure 7. The black line is the observed daily water temperature, whereas the red line is the five-day moving average plotted through this data.

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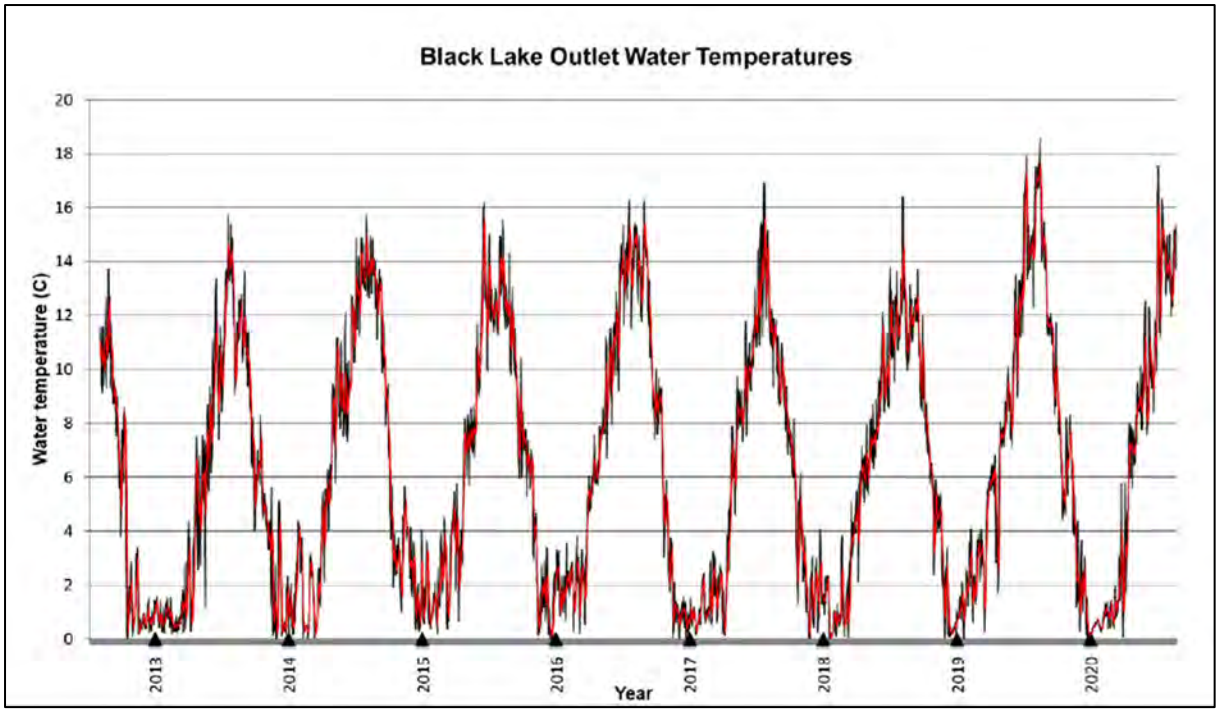

Figure 8. Daily water temperatures observed at the outlet of Black Lake (Freundlich & Schindler, 2021).
Note: Triangles on horizontal axes denote January 1 of each calendar year.

To monitor the flows in the Alec River and determine the proportion of flow going to the north and south channels, UW-FRI typically measured flow in the Alec River every 10-14 days throughout June – early September to capture the peak of spring snowmelt and the descending limb of the hydrograph in the late summer (Freundlich & Schindler, 2021). Measurements are taken at 1-meter intervals at the two North and South Alec Hydrology locations, shown in Figure 6, using a Swoffer flow meter (accuracy 0.01 m/s) at 60% of the channel depth. The results can be seen in Figure 9 (Freundlich & Schindler, 2021). During high flow events, approximately equal amounts of water flow out of the two channels. An increasing proportion of the flow enters the south channel as total discharge declines. Only a single data point was collected in 2020 due to a very restricted field season.

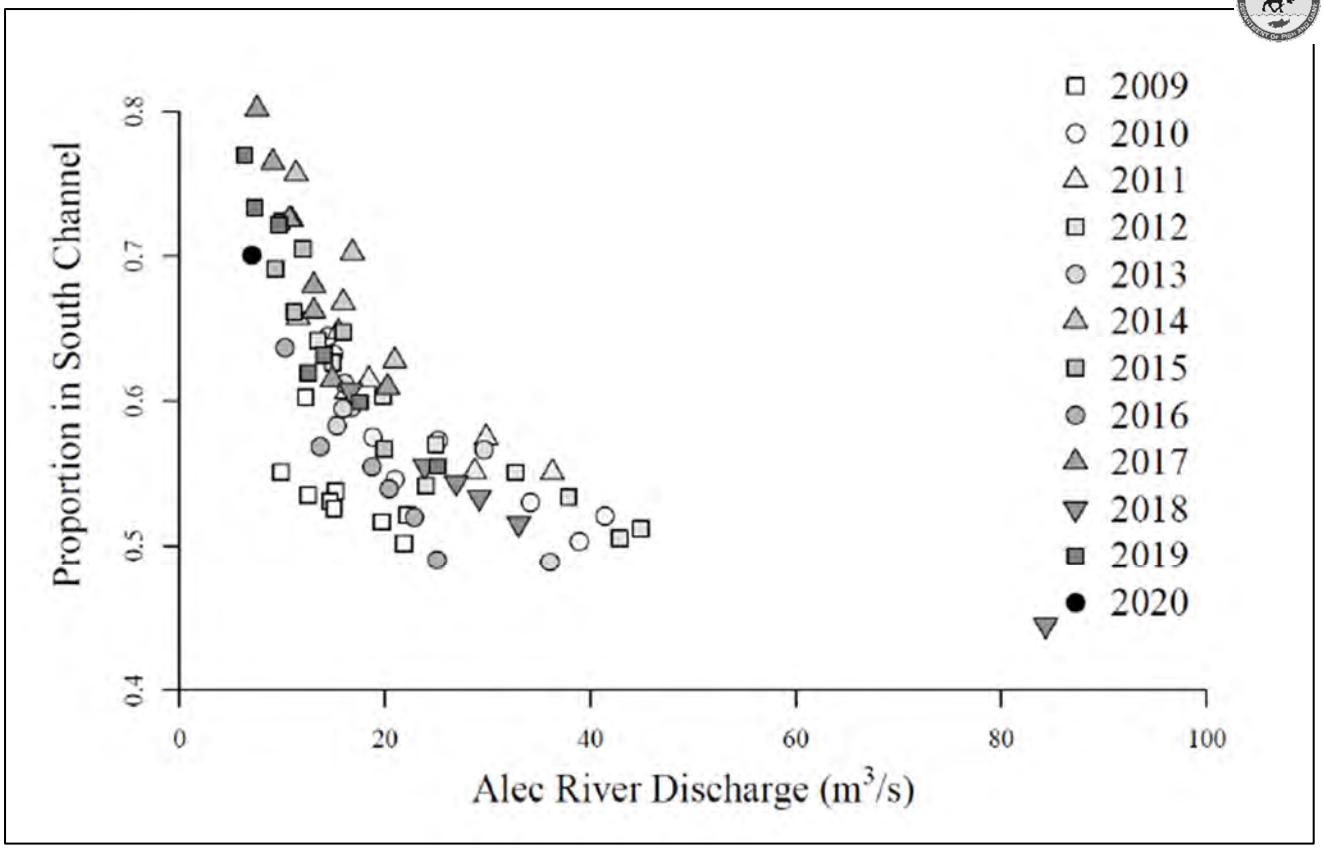

Figure 9. Proportion of Alec River discharge entering the south channel across a range of total discharge levels (Freundlich & Schindler, 2021).

Lastly, cross section surveys were taken for the locations downstream of the Black Lake outlet on the Black River (see Figure 6) that had experienced a large amount of erosion and incising after the West Fork migration in the early 1960s. Each cross section had been previously measured by the USACE in 2012 and is tied to known-elevation USGS control-point monuments to allow comparisons of elevation over time (Freundlich & Schindler, 2021). Elevations were measured using a self-leveling laser level (Spectra Precision LL100 Laser Level; Trimble Construction Tools, Dayton, OH), stadia rod, and forestry tape. Channel elevations were measured at 1-meter intervals within the active river channel, and at 5-meters intervals on the floodplain. Cross-sectional elevation measurements can be seen in Figure 10 (Freundlich & Schindler, 2021).

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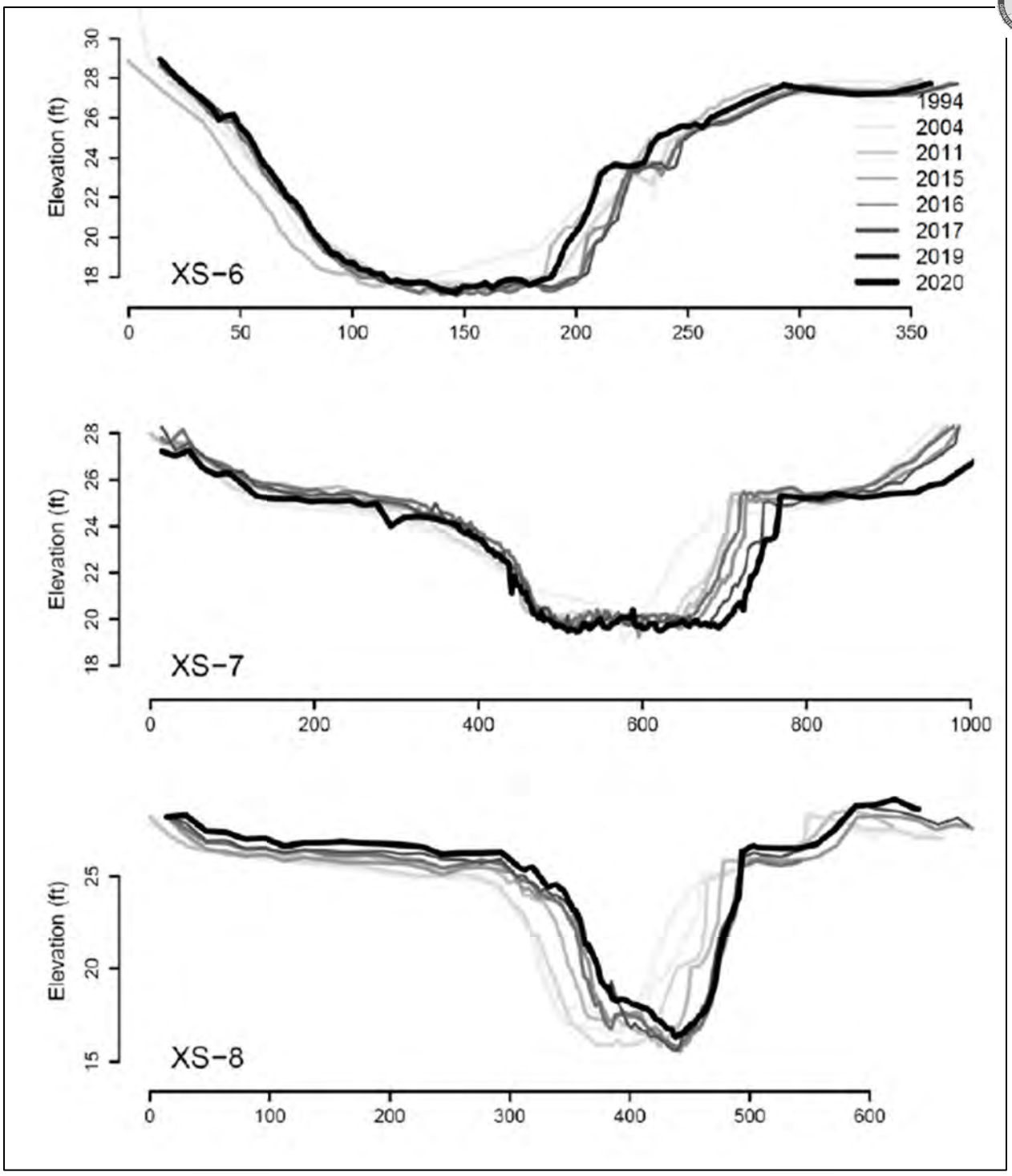

Figure 10. Comparison of 2020 Black River cross-sectional elevation measurements with previous surveys in 1994, 2004, 2011, 2014-2019 (Freundlich & Schindler, 2021).

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Capturing satellite imagery or aerial photographs of the area every five years was recommended as part of the USACE monitoring plan, yet these have not been obtained thus far.

2021 Site Visit

On 8 September 2021, three USACE employees flew to Black Lake via helicopter for a site visit.

Alec River

The Alec River flows from both the north and south channel of the Alec River were negligible, flowing at what seemed to be less than 50 (CFS) based on visual observations. As noted in previous reports (USACE, 2012 and Freundlich & Schindler, 2021), less flow was seen flowing in the north channel of the Alec River. The flow used to predominantly flow in the north channel as seen in the 1953 image in Figure 11. At some point after 1953 and before 1990, the flow began to flow primarily in the south channel. A large reason for this seems to be the sand bar that has accumulated in front of the north channel (Figure 11). This sand bar is seen in aerial imagery since 1990 and seems to be slowly expanding in size over time. From the 2021 site visit, dense vegetation can be seen on the sand bar, indicating its stability within the channel. On average, approximately 70% of the Alec River flow goes to the south, and the remaining 30% goes to the north (Freundlich & Schindler, 2021). This ratio has been observed since 2004 (± a few percent) (USACE, 2012). During high flow events, approximately equal amounts of water flow out of the two channels.

Figure 11. Alec River Bifurcation Over Time

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Spits

Aerial imagery from 1953-1993 show the presence of two sand spits in Black Lake in and southeast of Alec Bay (Figure 12). It is difficult to assess these images since the WSE at the lake is unknown during the times these images were taken, and as previously mentioned, the lake can fluctuate on average 4.5 ft. each year. One image could have been taken when the WSE was high, making the spits look less prominent than if the WSE were lower. Evidence of the sand spits forming can be seen as far back as 1953 and 1957 (Figure 12).

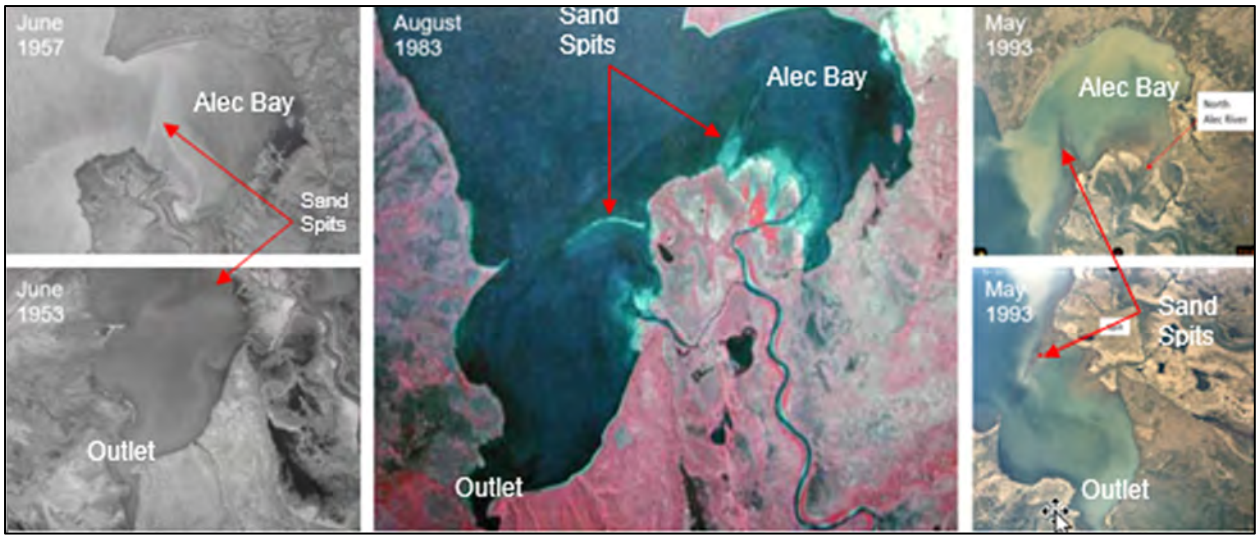

Figure 12. Satellite Imagery of Black Lake Spits Over Time

Figure 13 shows aerial images of the two spits in 2002 and 2021. These images were both taken during September, which would suggest similar WSE's in the lake with some variability to be expected. The spits appear to extend to the same point within the lake and to not have grown much in length over the last twenty years. The 2021 images show more vegetation on the spits, which indicate that they are stable within the lake although they do get inundated periodically throughout the year.

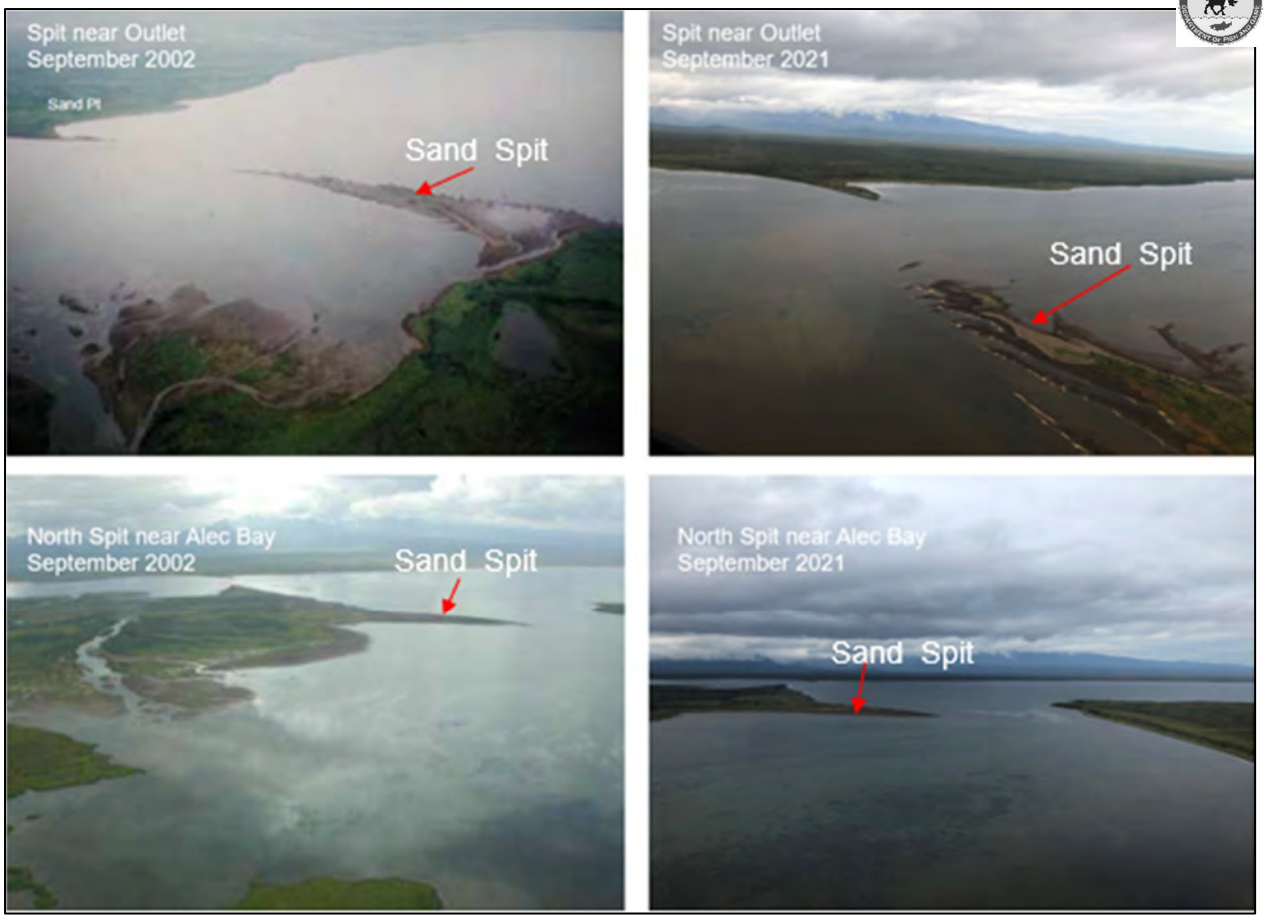

Figure 13. Aerial Imagery of Black Lake Spits Over Time

Alec River Delta

The Alec River delta is a lobate delta and has been migrating and changing over time (USACE 2012) depositing sediment and shifting mouth locations, which is typical delta behavior in a natural setting. The delta is formed as the velocity of the river slows entering the lake depositing the sediment load from the river. As sediment builds in a channel, new channels open. With most of the flow shifting to the south channel, the outflow at the mouth of the delta in the north channel is moving at a lower velocity, depositing more sediment near the mouth, and when the sediment reaches a certain elevation, the mouth of the delta will shift to account for the change in slope.

The Alec River delta will continue to change naturally over time as sediment is continually deposited near the distal edge of the delta, forcing shifts in both the magnitude of flow in the delta channels and over time the location of the channels. However, the current southern Alec River channel cannot migrate any farther east or south due to a high relic shoreline bluff along its south riverbank (Figure 14). These bluff soils are quaternary marine terrace deposits consisting of well sorted sand and gravel plateaus, ending locally with prominent wave-cut scarps (USACE, 2012). This marine terrace also resists the possibility of the Alec River delta from migrating south enough to discharge flow directly into the Black River and bypass the lake (USACE, 2012).

Based on previous analyses from the USACE 2012 technical report, the inflow from the Alec River would likely be sufficient to ensure the southern spit remains open for the foreseeable future, even if all the flows within the Alec River were to switch to its southern delta channel (USACE, 2012). Based on the estimated distribution of inflow into Black Lake, even if the Alec River is excluded, the remaining western Black Lake watershed recharge will maintain a hydrologic connection between the northern and southern areas of Black Lake (USACE, 2012). An estimated 32 percent of the water flowing out of Black Lake originates west of the southern sand spit near the outlet of the lake.

Figure 14. Overhead Color Infrared Photograph Showing the Marine Terrace Adjacent to Blake Lake (top) and Oblique Photograph Showing the Same Marine Terrace (USACE, 2012)

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Black River

After the West Fork River confluence migration in the early 1960s, the Black River experienced erosion and downcutting especially in reaches 2 and 3 (see Figure 5) due to the changes in location of sediment inflow. Two locations of riverbank erosion/collapse were documented in both a 2002 and 2021 USACE site visit between reaches 2 and 3. The riverbank appears to have stabilized at these locations over the almost 20-year period between the two photos from this migration (Figure 15, Figure 16), which is confirmed by the cross section surveys completed by UW-FRI (see Figure 10). The surveys of the cross sections from reach 3 near the outlet of Black Lake (see locations in Figure 6) date back to 1994 and show minor lateral channel migration and incision, which is expected from a natural riverine system.

The West Fork River currently appears to have migrated as far south as possible with a hardpoint preventing further migration. While no estimates have been made on when the West Fork River will migrate back towards Black Lake, if and when this does occur, one can expect to see aggradation within portions of the Black River again (USACE, 2012).

Figure 15. Bank Collapse between Reaches 2 and 3 in 2002 and 2021

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Figure 16. Bank Erosion between Reaches 2 and 3 in 2002 and 2021

5.0 FISHERY RESOURCES

Low adult sockeye salmon returns to the Chignik-Black Lake system are the driving force that initiated this study and are a primary reason for concern over potential changes in habitat conditions, especially in Black Lake. These return data are summarized at ADF&G (http://www.adfg.alaska.gov/index.cfm?adfg=chinookinitiative_chignik.main). Several factors that could affect sockeye salmon returns to the Chignik-Black Lake system are outside the scope of this study. These factors include changing ocean conditions, harvesting outside of the Chignik area, and competition with hatchery fish of various species.

While the USACE 2012 technical report focused on perceived problems in Black Lake (i.e., shallower, warmer, and isolation of the upper basin), a better approach is to view this area is as a system that provides resiliency for sockeye salmon. Variations in adult returns may be due to external factors mentioned above or due to year-to-year variations in the Chignik-Black Lake watershed. While external factors are beyond the scope of this study, it is important to recognize whether the Chignik-Black Lake watershed is experiencing natural variations or a downward trend. While variation is normal, a downward trend could lead to long term changes in fishery resources.

Within the Chignik-Black Lake system, there do not appear to be any factors that would limit access to returning adult sockeye salmon in the summer or limit their access to or quality of spawning areas. Common factors that could limit access to the system by returning adults are low water levels or blockages (either natural or due to human-activities). Spawning habitat can be degraded by very low water, siltation, major changes from flood events, and water quality problems such as contamination or low dissolved oxygen. None of these factors appears to be a persistent issue in this system that would drive a downward trend in the number of returning adult salmon.

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As discussed in the Section 4.0 - Physical Geomorphological Change Assessment, conditions in Black Lake have some variability but have been largely consistent for the past several decades. This consistency is due to the fact that Black Lake and Chignik Lake function as a connected ecological system rather than individual components. Griffiths et al., (2013) provides an in-depth analysis that discusses connectivity and resiliency in this system and forms the basis for the rest of the fishery resources discussion.

Connectivity allows the Chignik-Black Lake system to be a resilient ecological system. For juvenile salmon, connectivity functions in one direction in this system; emigration can occur for juveniles to head downstream to Chignik Lake, but they cannot go to Black Lake, nor can Chignik Lake-origin juveniles leave and move upstream to Black Lake. Juveniles rearing in Black Lake tend to have better body condition than Chignik Lake salmon fry rearing in their colder and less productive natal habitat. However, at some point in the summer some of the Black Lake rearing fish, notably those in poorer body condition, emigrate downstream to rear in Chignik Lake. Metabolic demands in warmer water are higher, and this can lead to an increase in growth rate, given the adequate availability of food. For Black Lake salmon fry in poorer body condition, there is likely an advantage to emigrating to the cooler and less productive waters of Chignik Lake. The salmon fry that emigrate from Black Lake tend to have similar body condition to salmon fry rearing in Chignik Lake. The proportion of Black Lake salmon fry that emigrate to Chignik Lake is variable among years, but there is always some degree of emigration. It is possible that by reducing the number of salmon fry in Black Lake through emigration to Chignik Lake that the salmon fry that remain in the warm and productive environment have adequate food to support their growth. The emigrants in poorer body condition may also benefit; first, by reducing their metabolic rate, but also by having a longer period where they can grow due the thermal mass of Chignik Lake (i.e., it holds it temperature for longer during the cool air temperatures in the fall).

This connectivity provides resiliency going forward for potential habitat changes over time. Juvenile salmon have options they can exploit based on a variety of water temperature regimes. The system has buffering capacity to absorb less than ideal conditions in one part of the system so that there can be a measure of success each year even with less-than-ideal conditions.

6.0 CONCLUSIONS

Annual seasonal WSE fluctuations in Black Lake occur, with historical WSE peaks still being seen after large storm events. The data does not show a downward trend of Black Lake WSEs. The water temperature within the lake also fluctuates yearly, with a high of around 65° F in 2019. This was an exceptionally warm year within the state of Alaska, and this temperature has not been reached in 2020 or 2021, the most resent measurement. Typically, the lake does not exceed 62.5° F. Black Lake is a shallow lake, and as such modeling indicates that air temperature is the primary control for the water temperature. With climate predictions for the state of Alaska showing a warming

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trend, the likelihood of higher temperatures being seen in the lake over time is probable Predicting the frequency of these higher temperatures, however, is not possible.

The proportion of flow going to the south and north branches of the Alec River has been consistent since it was first documented in 2004. The two spits located within Black Lake do not seem to have extended in length much, or at all, in several decades and can be seen in satellite imagery back to the 1950s. Therefore, changing the course of the Alec River is not advised. Negative consequences could arise from this, such as filling in Alec Bay due to the increased sediment influx to that portion of the lake. The Alec River delta has been behaving consistent with normal geomorphic processes since the 1950s, depositing sediment at the distal edge of the delta and shifting mouth locations over time. The geomorphic processes shaping the delta occur in a geologic time frame and have been occurring since before recorded history.

A major factor in the change in average WSE seen within Black Lake was due to the natural shift of the West Fork River in the early 1960s and the drastic incision that followed within the Black River, leading to an increase in the outflow at Black Lake. The Black and West Fork River's seemed to have reached quasi-equilibrium since its original shift, with no significant increase in bank erosion since 2002. Based on surveys, the channel is migrating laterally and incising at a reasonable rate. Due to this, the outflow from Black Lake should remain relatively stable over time unless another drastic shift in the river system were to occur. Since the West Fork River cannot migrate any farther south due to a hard point, it would only be able to migrate back towards Black Lake, which would cause aggradation within portions of the Black River and most likely increase the average WSE within Black Lake.

The hydrological changes observed in Black Lake are indicative of a hydrologic system functioning within the normal range of variability. The Chignik-Black Lake system continues to be a resilient ecological system. Adult salmon annual return numbers have, most likely, had very little impact from hydrologic and geomorphic changes. In the absence of a catastrophic event (i.e., volcanic eruption, significant landslide) the future geomorphic system and resulting impacts to the ecological system are expected to remain in the normal range of variability.

7.0 REFERENCES

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Griffiths J.R., Schindler D.E., Balistrieri L.S., Ruggerone G.T. 2011. Effects of simultaneous climate change and geomorphic evolution on thermal characteristics of a shallow Alaskan Lake. *Journal of Limnology and Oceanography*. 56(1),193-205.

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PC81

February 4, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, and sport fisheries. Salmon fishing in the South Alaska Peninsula region is very important; commercial salmon fishing is how I make a living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Ole Johansen
olegordon@hotmail.com
(907) 386-6206

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

Proposer-128, I wish to amend my proposal....

PROPOSAL 128

5 AAC 05.331. Gillnet specifications and operations.

As Amended-to exclude Nelson Lagoon from 45md, and to make North Area M Northern and North Western Districts (currently 70md) 45md for entire season.

Nelson Lagoon will stay status quo at 29 meshes deep. Only current 70 meshes deep salmon gear types be reduced to 45 meshes deep.

We have tried this mesh depth before, but local management testified that ADF&G would not support 45md in Nelson Lagoon. Who said anything about Nelson Lagoon wanting 45md, it would be insane to fish in a flounder infested, dirt blanket causing kelp location such as Nelson Lagoon with a 45md net. NO WAY! I would like to see all 70md nets in North Area M be reduced back to mesh depth of 45md as it was before mid 1980's. Deeper nets allow for more fish to be harvested each set. These deep nets allow the boats to remain fishing longer in the water without much threat of the boats being blown out to sea or onto the beach. Having shallower nets at 45md, the boats would not be able to hang on the nets in heavy weather for long without blowing into closed waters. These big boats are like sails, and when the net keeping them from blowing out to sea, they are able to keep fishing longer. Area M is an intercept fisheries, maintaining a 24/7 fisheries from 20th of June to the end of salmon season. 70md drags the bottom of the shallow North Area M waters, cutting off from top to bottom, no possible way for fish to avoid the nets, only to go around. While these 70md are dragging the bottom, they are slow and are 200ftm set net, saying in one place way longer that a 45md, that would not drag the bottom a second set off the beach. When nets were 45md, and 3days on 4days off in spring, and 4days on and 3 days off in July, Nelson Lagoon did not have a problem with the interception as it does now.

PROPOSAL 120

5 AAC 09.320. Fishing periods.

"Modify fishing periods in the Northern District.

As amended-Limit salmon harvests to 3 consecutive days of salmon harvest/week followed by 4 consecutive days NO harvest/week in the Area M Northern District Sections. 3 days on, 4 days off.

Limit salmon harvest to only one Area M Northern District Section at a time/week (1 sec only for 3 consecutive days only, followed by mandatory 4 consecutive days closure).

---Nelson Lagoon is failing, another bad season due to interception fishing is going to kill Nelson Lagoon off for good. Rolling closures and fleet put on limit proves that NLG fish are still coming when they actually

have a chance to get past all those 160 boats fishing 24/7 starting June 20th. I cant go 100 miles away in either direction from NLG to catch NLG bound salmon. NLG fish have always come down from the north (Bristol Bay) above OPH, Cinder River. Area M fisherman claim that those fish in OPH are BB fish, they mill back and fro on there what north. NO WAY. These guys anchor up all day long for the tide to change to flow back south away from closed waters, and not spread out throughout the harvest area. 90% if these boats fish the farthest north line, and always set their nets for fish running south to southern streams like Bear River and Nelson Lagoon. Everyone who has ever fished North Area M knows this to be true, you are not hearing the truth of what is going on. Did anyone ever tell you how those guys fish on the north line North Area M? Maybe this could shed a little light on that subject and reveal the true nature of these user group. You have Chignik and Nelson Lagoon, AREA M's own back yard getting pummeled every year. Look back at any proposal that Area M or CAMF has submitted over the years. Each proposal is to expand harvest area, increase harvests, or just make life easier for their fishery. You ask them these things I speak of. They are not for conservation, they are here to make a quik buck and go back to their winter jobs. This is a paid vacation, and many communities in Alaska are suffering because of their greed. Thank you for reading, please help us protect the only thing we know. Please someone help us!

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 120: Support **Proposal 128:** Support

PC83

January 30, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is very important to me as I live in Sand Point, Alaska and commercial fishing has been my livelihood as well as that of my wife, family, and grandkids. The cut back that was experienced last summer was not good. I set net fish and sell my catch to Trident Seafoods; without revenue from this fishery it will surely devastate the community. I believe we are not the problem for what is happening to certain salmon runs.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Artemie Kalmakoff
kajren18@gmail.com
(907) 383-2024

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC84

January 17, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Anchorage, Alaska and I work for Pacific Seafood Processors Association, a non-profit organization whose members include shoreside processors located in 21 communities across Alaska, including in the Eastern Aleutians. These processing operations and fishermen in the small communities of False Pass, King Cove, and Sand Point are dependent upon the commercial salmon fisheries for jobs, income, tax revenue, and the community infrastructure developed to support a viable salmon industry.

The ability to have a local economy in these communities is directly related to access to the salmon fisheries. These harvests sustain families and provide the vast majority of the operating revenue for the communities through local, borough, and state fish taxes. Without salmon, these processors and the fishing economy they support would not be possible in these communities. Salmon fishing in the South Alaska Peninsula region is very important; The fleet and processors worked hard in 2022 to significantly reduce chum harvest and there is a strong commitment to continue the approach used in 2022 and strengthen it to create greater responsiveness (move fishing to avoid chum), faster and more accurate information sharing across the fleet (to avoid chum), and more accountability via a database that the entire fleet would participate in.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums. According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Nicole Kimball
nicolek@pspafish.net (907) 223-1648

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 109: Oppose
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose

PC85

February 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Anchorage, Alaska but I fish in Area M occasionally. I grew up in False Pass and King Cove. I participate in commercial, subsistence, sport, and personal use fisheries, as well as through local business supporting fisheries. I am an Area M commercial fisherman and I do environmental work with and for the region. I am from the communities of False Pass and King Cove. Commercial fishing sustains our family and all of the families in the region. We are also subsistence users. The rich resources of the Bering Sea have sustained our communities and people for millennia. The constant attack on our small fishery and right to continue fishing here threaten our way of life—the Aleut/ Unangaŝ way of life. Without commercial fishing, our communities might cease to exist. Salmon fishing in the South Alaska Peninsula region sustains our families both economically and culturally. We have always been salmon fishermen. When we are salmon fishing, we are able to provide food and money for other necessities for our families.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Nadine Kochuten
nadine_907@hotmail.com
(907) 830-1737

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

Kodiak Aleutian Alaska Subsistence Regional
Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: 907-786-3888 Fax: 1-907-786-3898
Toll Free: 1-800-478-1456

PC86

In Reply Refer To:
RAC/KA.23019.LHS

FEB 03 2023

Ms. Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

During the Kodiak/Aleutians Subsistence Regional Advisory Council's (Council) fall public meeting held on September 21-22, 2022, the Council developed the following positions and comments on Proposals 98, 103, and 169 that will be taken up by the Alaska Board of Fisheries (BOF) at upcoming BOF meetings.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Kodiak and Aleutian Region of Alaska. The Councils were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence used of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

Alaska Peninsula/ Aleutian Island/ Chignik Finfish BOF Meeting comments

PROPOSAL 98

Modify waters closed to subsistence fishing for salmon to increase access for subsistence users who are not commercial salmon fishery permit holders. 5 AAC 01.425.

The Council **supports Proposal 98.** The Council supports increasing access for subsistence users, who do not hold a commercial limited entry permit, to harvest salmon for subsistence when fish are readily available. Current restrictions, which prohibit commercial permit holders from harvesting salmon when commercial fishing is closed, will remain in place. Both Federal Subsistence Board and State Board of

Fisheries have established customary and traditional use determinations for subsistence salmon in the Alaska Peninsula Area. The current regulation limits opportunities and causes unnecessary burden on subsistence users in this area. Moreover, subsistence fishermen are restricted from subsistence fishing during commercial salmon openings, while sport fishermen are allowed to fish.

PROPOSAL 103

Reduce the bag and possession limit for coho and sockeye salmon in the salt waters and freshwater drainages of Cold Bay. 5 AAC 65.022.

The Council **supports Proposal 103.** The Council supports this proposal and noted concerns from local subsistence users in Cold Bay, including the failure to achieve escapement of Sockeye Salmon in Mortensen's Lagoon since 2018 and an increase in sport fishing efforts on the north side of Cold Bay including Kinzarof Lagoon and outlet of Swan Creek. The Council supports this proposal to reduce the daily bag limit of Sockeye and Coho salmon combined to 5 per day that would provide for more conservative management for the saltwater and freshwater drainages of Cold Bay.

Statewide Finfish and Supplemental Issues BOF Meeting Comments

PROPOSAL 169

Classification of banned invasive species. Amend the list of banned and invasive species into two categories to allow the legal possession and import of edible portions of listed species that may be sport caught in other states for consumption. 5 AAC 41.075.

The Council **supports Proposal 169.** The Council supports this proposal because it will allow public removal of the Crustacean species of Signal Crayfish from the Buskin River area in Kodiak. Signal Crayfish are a banned invasive species that may not currently be "possessed" under existing regulations at any stage of its lifecycle. This regulation if adopted would allow for the harvest, possession, and consumption of Signal Crayfish, that are now present and prolific in the Buskin River and Buskin Lake on Kodiak Island. Sockeye Salmon return to the Buskin River annually and the system supports an important subsistence fishery. The Council has concerns that the Crayfish are consuming Sockeye Salmon eggs, alevin, and fry in Buskin Lake. This regulation would allow for harvest of Signal Crayfish from Buskin River and Buskin Lake, which will help reduce this invasive species and lessen negative impacts on Sockeye Salmon.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Lisa Hutchinson-Scarbrough at (907) 310-4097 or lisa_hutchinson@fws.gov.

PC86

Sincerely,

Della Trumble
Chair

Enclosure

cc: Federal Subsistence Board
Kodiak Aleutian Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 98: Support **Proposal 103:** Support

Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

PC87

To the Alaska Board of Fisheries

Re: Support proposal 108 For Chignik Area Salmon Management

The Kodiak Seiners Association urges you to consider **supporting proposal 108 as amended by the Kodiak Fish and Game Advisory Committee,** as it seeks to provide opportunity to fishermen in the Chignik Management Area, in a conservative management approach designed to limit significant pressure on a depressed Chignik early run, while recognizing historical harvest patterns.

Contrary to other proposals which would seek to open the Eastern Section of the Chignik management area with zero regard for a harvest component that is arguably non-local, this proposal provides conservative management strategies to allow traditional harvest of local stocks while limiting any expanding effort which might place additional harvest pressure on already fully utilized mixed stocks.

KSA is not advocating for the removal of the component of the Chignik historical harvest that is non Chignik fish, rather we are asking the board to help redesign the Chignik fishery that acknowledges a component of mixed stock harvest, yet take a conservative approach to doing so.

Sincerely,

Darren Platt
KSA President

Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

PC87

To the Alaska Board of Fisheries,

RE: Oppose Proposal 111 for Chignik Area Salmon Management

The Kodiak Seiners Association strongly **opposes proposal 111**. Under the current management plan, Chignik fishermen are provided ample harvest opportunities in terminal inner bay areas, which they have failed to exploit. Increasing harvest opportunities in the outer portions of the Eastern District in August would increase pressure on non-local, fully allocated, mixed stocks of all salmon species and impact adjacent regional fishing communities. The current management plan for Chignik provides no accounting, limitations, or recognition of mixed stock harvest. Due to recent restrictions designed to reduce the *traditional* harvest of non-local stocks that the Alaska Board of Fisheries has imposed on the adjacent areas of Kodiak and Area M, it would be contradictory to the Board's own actions and long-standing policy to promote the continued expansion of harvest on fully allocated, non-local mixed stocks in the Chignik area. Any changes to the harvest strategy in Chignik that could result in *any* increased harvest pressure on non-local stocks should only possibly be adopted once proper mixed stock accounting and limitations are imposed to assure that changing harvest patterns only increase harvest opportunities of local stocks without increasing pressure on non-local stocks.

Chignik fishermen are already prosecuting the Gulf of Alaska's *only* expanding fishery on fully allocated, non-local, mixed stocks. Additionally, the Chignik area has long advocated against the very type of fishery that this proposal promotes. The proposed changes would violate long-standing Board policy on the management of mixed stocks. Furthermore, it would contradict recent Board harvest strategies for adjacent areas while violating the long-professed values of Chignik area fishermen.

Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

PC87

To the Alaska Board of Fisheries

Re: Support proposal 112 For Chignik Area Salmon Management

The Kodiak Seiners Association urges you to consider **supporting proposal 112** as it seeks to provide protections for non-local stocks harvested within the Eastern District of the Chignik Salmon Management Area, and would limit any additional pressure or expansion of effort on an already fully allocated mixed stock fishery.

Draconian measures were taken at the Kodiak Board of Fisheries meeting in January of 2020 to limit the harvest of non-local sockeye in the Mainland district of the Kodiak Area, erasing a significant component of a decades old management plan. These measures came with harvest caps extending the entire length of the mainland section of the Kodiak Management Area. The Western-most border of the Mainland Section shares a line with the Eastern District of the Chignik Management area, and can be assumed that the stock composition of fish swimming east through the Eastern District of Chignik is a similar composition as those fish harvested in the Cape Igvak section of the Mainland District. The Kodiak Seiners Association requests that the Board apply consistency in its application of policy concerning the management of mixed stock fisheries. Why should Kodiak Fishermen bear the sole burden of conservation for the incidental harvest of non-local stocks?

This proposal seeks to allow opportunity for Chignik Fishermen to harvest pinks and chums under the historical harvest patterns, while providing similar protections for non-local stocks as have been imposed in the Kodiak Management Area. An excerpt from the Alaska Board of Fisheries, Mixed Stock Salmon Fisheries 5 AAC 39.220, dated March 16, 1993 reads, "*Mixed stock salmon fisheries are often the focus of intense political controversy. Fishermen need to know what standards will be used by the Board in making decisions affecting those fisheries. Equally important, fishermen need to be assured that those standards will be applied uniformly to all mixed stock salmon fisheries, not just those that engender controversy and notoriety.*"

Without some form of protections for the harvest of non-local stocks in the Eastern District of Chignik, Chignik fishermen will be allowed an unregulated allocation of already fully-utilized mixed stocks, and will inevitably place undue and increased harvest pressure on those stocks.

Sincerely,

Darren Platt
KSA President

Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

To the Alaska Board of Fisheries:

RE: Oppose Proposal 113 for Chignik Area Salmon Management

The Kodiak Seiners Association strongly **opposes proposal 113** due to the increased pressure these changes would impose on fully allocated, non-local, mixed stocks. The WASSIP study demonstrated the high numbers of non-local sockeye stocks in Western and Perryville districts, with numbers ranging from 35-50% stocks of non-local origin. Harvest patterns in Chignik have shifted drastically in recent years resulting in increased effort in these areas placing significantly higher pressure on non-local stocks. The East of WASSIP reporting group was reported in high numbers, meaning that harvest in this area likely focuses on non-local Cook Inlet and Kodiak bound sockeye. The graph below demonstrates how effort has recently shifted out of the Chignik Bay and Central sections and into the outlying areas where non-local stocks comprise a larger portion of the harvest:

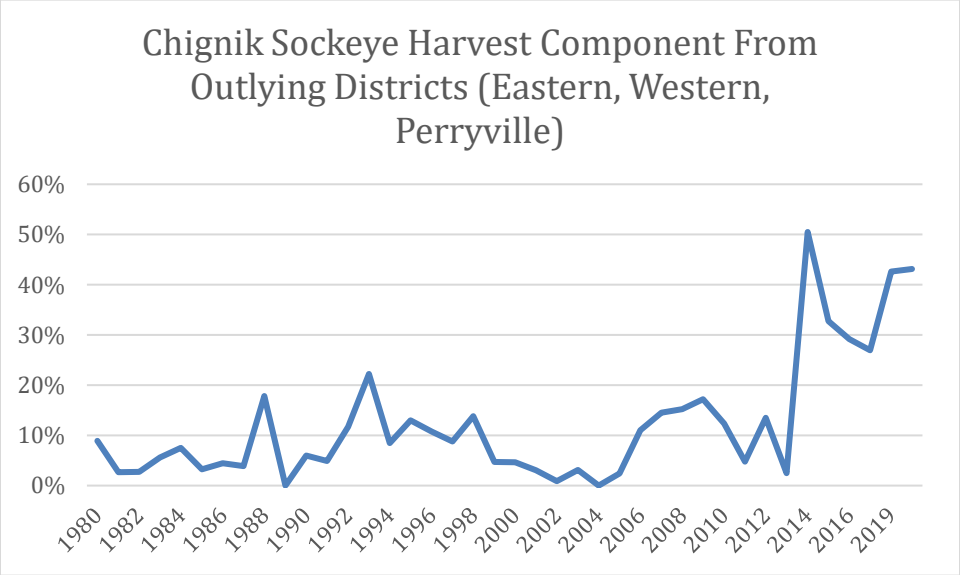

Figure 1: A substantial shift in effort beginning in 2014 has resulted in non-traditional harvest patterns in the Chignik, concentrating effort on non-local stocks.

Prior to 2014, effort in Chignik was highly concentrated in the Chignik Bay and Central sections. Though these areas also demonstrated a significant presence of non-local stocks, the WASSIP study found the highest presence of non-local stocks in the Western and Perryville sections. This means that Chignik is already prosecuting an expanding fishery on fully allocated, non-local, mixed stocks and any changes to the management plan should impose harvest restrictions

Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

in these areas. Proposal 113 instead proposes to liberalize harvest in these areas without providing any mechanism to protect stocks bound for Kodiak, Cook Inlet, and the South Peninsula.

The Chignik management plan fails to account for the presence of non-local stocks in Chignik, while relatively onerous and draconian measures have been adopted (and recently expanded) in Kodiak's fishery despite the lack of change of harvest patterns in the Kodiak area. Before allowing for any increased harvest opportunities in the Western and Perryville sections, the Board of Fisheries should first adopt provisions in the Chignik area that impose a burden of conservation of non-local stocks that parallel restrictions adopted in the Kodiak area. Furthermore, the Board should assure that the harvest of sockeye stocks not depart from the traditional patterns prior to 2014. Board policy dictates that Chignik fishermen must share in the burden of conservation of non-local stocks, and that expansion of effort on these stocks be prevented.

Changes to management in the Western, Perryville, and Eastern districts should assure that sockeye harvests in these areas not exceed the traditional 20% of the total sockeye harvest for Chignik in order to adhere to traditional harvest patterns in these areas. Additionally weekly caps on sockeye numbers harvested in these areas should be imposed, especially during July and August when high levels of Cook Inlet and Kodiak stocks are likely present, in order to ensure a burden of conservation of non-local stocks in the Chignik area. This would provide a more uniform and equitable salmon management approach in the Gulf of Alaska.

Public faith in the Board of Fisheries relies on the consistent inter-regional application of Board policies. It is difficult to reconcile the collection of restrictions placed on Kodiak fishermen to prevent the possible harvest of Chignik and Cook-Inlet bound stocks with the complete absence of similar restrictions in the Chignik area despite the known prevalence of non-local stocks harvested there. Kodiak fish and fishermen are equally deserving of protections and considerations as our neighbors. KSA asks that the Board of Fisheries first develop a plan on how to address the harvest of non-local stocks in Chignik before allowing for the continued growth of their fishery in areas known to have a high presence of fish bound for streams and communities outside of Chignik.

Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

To the Alaska Board of Fisheries,

RE: Oppose Proposal 114 for Chignik Area Salmon Management

The Kodiak Seiner's association is writing to express our strong **opposition to proposal 114**. The post-June fishery in Chignik has exhibited high rates of harvest of non-local sockeye stocks. Our opposition to this proposal is based on similar arguments presented in our opposition to **proposals 111** and **113.** The Eastern district of the Chignik management area is directly adjacent to the Cape Igvak section of Kodiak's Mainland district. The Board recently eliminated the post-June Cape Igvak management plan and imposed severe sockeye harvest restrictions in the outer waters of the entire mainland district with the intention of minimizing the harvest of non-local sockeye stocks. Chignik fishermen currently have no limitations on the harvest of non-local stocks and should have similar sockeye caps that trigger outer area closures for the Board to remain consistent in its application of management policy, allocation criteria, and distribution of conservation burden. Board arguments provided in deliberations at the Kodiak 2020 meeting should apply similarly to the Chignik management area in order to assure public trust in the fair application of Board policy. Energy should be focused on devising a plan to place limitations on non-local stocks harvested in the Chignik management area. Kodiak has long operated under the burden of the Cape Igvak management plan and the North Shelikof Straight Sockeye management plan that imposes a severe burden of conservation for non-local stocks on Kodiak fishermen. No such plan exists for the heretofore unacknowledged prevalence of mixed stock harvest by Chignik fishermen in the Chignik region.

PC87

Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

To the Alaska Board of Fisheries,

RE: Oppose Proposal 117 for Chignik Area Salmon Management

The Kodiak Seiners Association (KSA) opposes this proposal following similar reasoning to our opposition to **Proposals 111, 113,** and **114**. This proposal provides no accounting for the presence of non-local stocks and would constitute an expanded fishery on fully allocated, non-local mixed stocks. Chignik fishermen have been provided ample opportunities to prosecute targeted fisheries on local pink and chum salmon stocks in their inner areas and they have largely failed to exploit these opportunities. This proposal would simply allow Chignik fishermen to incorporate a larger portion of non-local mixed stocks in their harvests, a practice which they have consistently and passionately spoken against in adjacent areas. The Board would compromise fairness and consistency in its application of policy if it were to allow the continued expansion of a mixed stock fishery in the Chignik area while explicitly restricting similar fisheries in adjacent areas.

PC87

Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

To the Alaska Board of Fisheries

RE: Oppose Proposal 118 for Chignik Area Salmon Management

The Kodiak Seiners Association (KSA) **opposes proposal 118** due to lack of consideration for non-local stocks. Much of our reasoning mirrors our opposition to **proposals 111, 113,114,** and **117.** KSA is particularly concerned with the prevalence of Kodiak-bound late-run sockeye stocks. Kodiak is home to the only truly late-run sockeye stocks in the Western Gulf of Alaska. The Karluk system typically builds in strength with peak returns ranging from late August to late September. The Upper Station late sockeye run also peaks in late August, while the Ayakulik system experiences strong returns that typically do not beginning tapering until mid to late August. Late runs to these systems often produce well over 1,000,000 sockeye in aggregate. A large proportion of sockeye harvested in the Chignik area in August are most likely Kodiak-bound fish. Chignik is the only area in the Western Gulf with a growing mixed-stock fishery on non-local stocks and no conservation burden applied to their fishermen to protect the harvest of non-local stocks bound for adjacent management areas. KSA asks the Board to first devise a sockeye harvest strategy for the Chignik area that accounts for the non-local component of sockeye stocks, which imposes similar restrictions as those already in place within the Kodiak management area. The absence any restrictions on harvest of non-local stocks in the Chignik management area is a blatant inconsistent application of Board policy.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 108: Support With Amendments	**Proposal 111:** Oppose	**Proposal 113:** Oppose	**Proposal 117:** Oppose
	Proposal 112: Support	**Proposal 114:** Oppose	**Proposal 118:** Oppose

PC88

Submitted by: Mike Kramer

Community of Residence: Fairbanks

Comment: The Board should adopt proposal 140 without amendment.

The Board has altered the Area M June Fishery regulations at least every 3 years since 1984. Within Area M, The South Unimak and Shumagin Islands fisheries have always intercepted the largest numbers of AYK Chums, particularly in the June fishery. Proposal 140 limits fishing hours in June to protect AYK (aka CWAK) Chums.

The board will be lobbied by commercial harvesters to take less restrictive action than 140 calls for,. They will point to a number of other watered down proposals, such as proposals 131-139 and 141. They will suggest these other alternatives are less economically disruptive.

The BOG should remain focused on its role to protect and conserve stocks of concern, and to implement the subssitence priority. Proposal 140 is the only proposal that will fulfill the boards obligation to impose conservative management and ensure that tens of thousands of AYK Chums, that would have otherwise be intercepted will instead escape to their natal streams in the AYK region instead of being intercepted in Area M.

The ADFG attempts to redefine 140 as an allocation issue when it is clearly a conservation issue necessary to protect a threatened stock essential to the subsistence culture of the entire region.

Previous boards have conservatively managed these fisheries to conserve Bristol Bay sockeye stocks of concern. When the concern has been AYK Chums, the BOF has tried two primary approaches, delaying the start of the June season, and establishing Chum caps. Neither approach has worked because they have constantly been modified.

Currently the fishery starts on June 6. This is the earliest opening date in the previous three decades. Chum caps have ranged from approximately 400k to over 800k, and, like opening dates, have also been altered almost every year whenever ADFG has retained the authority top do so. With very low chum caps, such as in 2000, harvesters engage in chum chucking. Literally throwing dead Chums overboard to avoid the cap. Caps have been raised and lowered over the years seemingly based on factors unrelated to conserving Chums. Even with higher caps, there has historically been no consequence to exceeding the caps, especially when Bristol Bay Sockeye are thriving.

The fishery has, for far too long, been managed to meet the guideline harvest levels (GHL) of Bristol Bay Sockeye, and not to actually conserve AYK Chum stocks of concern.

The harvesters will argue that the WASSIP study is outdated and we need to wait for new long term studies before taking any conservation action. They will argue that if any conservation measure is considered, it should be very minimal.

The AYK needs to escape as many Chums as possible. In 2021, Area M harvesters killed 1,168,601 Chums while the Yukon only returned 8% of its most recent 10 year average return and the Kuskokwim only returned 6% of its most recent 20 year average return.

Both of these major river systems are facing a Chum salmon crisis of historical proportions. There is no commercial fishery and subsistence harvests have been essentially eliminated.

The South Unimak and Shumagin Island June fisheries also historically harvest a large number of AYK Chinook, another stock of concern. While currently only considered stocks of concern by ADFG ,Yukon Kings and Chums would both qualify for ESA listings. This BOF meeting may be the last chance the State of Alaska has to manage the harvest of AYK Chums and Chinook.

We don't need any more studies. The WASSIP study concluded that 57% of Chums caught in the June fishery were from CWAK.

In 2022 ADFG conducted a thorough genetic analysis of the South Unimak and Shumagin Islands Chum harvests in June. The department concluded that a total 72,275 CWAK Chums were harvested in these two areas during the June 6-June 28 Fishing periods.

The study found:

"Harvests of both Asia and CWAK were greatest in June and decreased throughout the season.

Most of the total estimated harvest of both Asia (199,253 fish, 57.6% of total) and CWAK (55,933

fish, 53.8% of total; Table 28) was harvested in the Unimak and Southwestern Districts seine

fishery..." (See, Special Publication No. 23-07, Genetic Stock Composition of Chum Salmon Harvested in Commercial Salmon Fisheries of the

South Alaska Peninsula, 2022

Chum caps have been enacted many times since 1984 and have always failed to promote AYK escapement. ADFG outlined the history of management changes in Appendix B1 of the GHL 2021 South Alaska Peninsula Salmon Annual management Plan. Some relevant excerpts are cited below.

"Although chum salmon have always been caught during the June fisheries, the unusually large chum salmon catches in 1982 and 1983 caused concern by fishermen 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 in order to allow “escapement windows.” The purpose of the “windows” was 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, eliminated fishing during the first 10 days of June, and eliminated 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. Additional restrictions during 1986 were the primary reasons for less than half of the combined South Unimak–Shumagin Islands sockeye salmon allocation being harvested in that year (Poetter 2007).

The regulations for the 1987 season were the same as those used in 1985. However, during 1988 and 1989 the BOF placed an annual 500,000 chum salmon catch ceiling on both fisheries combined.

In 1988, the abundance of chum salmon was about equal to sockeye salmon at South Unimak. This resulted in less than 40% of the South Unimak sockeye salmon allocation being harvested before the chum salmon ceiling was reached. Sockeye salmon abundance was higher in the Shumagin Islands and that fishery was able to harvest its allocation (Poetter 2007).

In 1989, sockeye salmon abundance was very high and sockeye salmon allocations were exceeded with relatively little fishing time. The Shumagin Islands sockeye salmon catch was 396,958 fish with an allocation of 264,000 fish; the South Unimak catch was 1,347,547 sockeye salmon with an allocation of 1,199,000 fish (Poetter 2007). A total of only 72 hours fishing time was allowed in the Shumagin Islands during 4 days. At South Unimak, 84 hours of fishing time was allowed with openings occurring during 5 separate days. The 1989 chum salmon catch was 47,528 fish in the Shumagin Islands and 407,635 fish at South Unimak for a total of 455,163 fish. The ratio of sockeye to chum salmon was low during the early part of the fishery and became high towards the end (Shaul et al. 1990).

After the 1989 season, the BOF made the following changes to the South Unimak and Shumagin Islands June fisheries:

(1) The starting date of the fishery was delayed until June 13 because the sockeye salmon to chum salmon ratio is normally lower during early June.

(2) The chum salmon ceiling for both fisheries combined was raised from 500,000 fish to 600,000 fish.

(3) The “window regulations” were eliminated because there did not seem to be a need for both a chum salmon ceiling and windows.

(4) The sockeye salmon allocation periods and allocations were changed. The percent of the total allocation by period were the same for each fishery.

Please make the time ead this entire appendix for a detailed history of all prior management regimes.

It is time we learned from past mistakes , and it is far too late to once again kick the can down the road citing a desire for more studies. The only action that will save AYK Chums is to get the commercial gear out of the water in June, 2023.

The current conservation concern facing AYK Chums is unprecedented and this board cannot avoid taking strong action now to protect this stock. Proposal 140 is the only proposal that ensures several thousand more AYK Chums will escape to spawn. Every single fish matters to conserve a stock of such monumental importance to the entire AYK region.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 140: Support

KUSKOKWIM RIVER
INTER-TRIBAL FISH COMMISSION
OUR RIVER, OUR PEOPLE, OUR FISH
P.O. Box 190 Bethel, AK 99559-0190 | (907) 545-7388 | info@kritfc.org | kuskosalmon.org

PC89

February 6, 2023

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o Alaska Department of Fish and Game
1255 W. 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526

RE: 2023 Alaska Peninsula Board of Fisheries Proposal Comments

Dear Chairperson Carlson-Van Dort and Members of the Board:

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) is an inter-Tribal agency representing the 33 Federally recognized Tribes of the Kuskokwim River watershed in fisheries management, research, and monitoring, and works to protect and sustain our Kuskokwim salmon fisheries and traditional ways of life using both Traditional/Indigenous Knowledge and the best available Western science.

Currently, KRITFC's subsistence-dependent communities are suffering through a multi-year, multi-species salmon collapse with resounding negative impacts on our food security, escapement goal attainment, and way of life. The simultaneous Chinook, chum, and coho salmon crashes on the Kuskokwim are inflicting nutritional, cultural, economic, ecological, and spiritual crises throughout our communities and watershed that are unprecedented and intolerable to our people. Please see our "2022 Kuskokwim River Salmon Situation Report" for more information about these crises on our river, attached to this comment and available on our website at https://www.kuskosalmon.org/documents.

Both our Tribes' local and Traditional Knowledge and the best available Western scientific genetic information confirm that significant numbers of chum salmon harvested in the South Alaska Peninsula (Area M) June fishery originated in Western Alaska. To protect these chum stocks amidst severe, unprecedented decline, **KRITFC urges the Board of Fisheries (Board) to adopt Proposal 140 as written in its entirety and to call upon Alaska Department of Fish and Game (ADFG) to implement in-season, real-time genetic sampling and analysis of Area M chum salmon harvests with further discussions of mitigation strategies.**

Before we acknowledge updated salmon genetics data recently released by ADFG, we want to address the past decade of salmon management in the South Alaska Peninsula and the Arctic-

Yukon-Kuskokwim (AYK) region. Until a few weeks ago, the best available scientific information intended to guide ADFG and the Board's management of South Alaska Peninsula and AYK salmon fisheries included genetic information from the Western Alaska Salmon Stock Identification Plan (WASSIP) studies conducted from 2007–2009. These studies showed that, on average, 57% of all chum salmon harvested in the South Alaska Peninsula June fishery are of Coastal Western Alaska (CWAK) stocks.[1] Should that average be applied to South Alaska Peninsula June fishery landings in 2021 as the best available information at the time, an estimated 690,000 CWAK chum salmon were harvested.[2] Compared to the record-low chum salmon returns, escapements, and harvests in CWAK rivers in 2021 – especially in the Kuskokwim and Yukon rivers – this degree of chum salmon interception is unbearably enormous.

In January 2023, ADFG released updated genetics information from the South Alaska Peninsula fishery for the 2022 season. This new data shows that, on average, 18% of South Alaska Peninsula June chum salmon harvests are of CWAK origin.[3] This marked declined signals two key messages: (1) First, since there is no other migratory passage from CWAK chum salmon that overwinter in the Gulf of Alaska to their spawning grounds except through the Alaska Peninsula, there is a severe decline in abundance of CWAK chum salmon stocks throughout their migratory range. (2) Second, this severe decline is linked to the cumulative effects of ADFG and Board mismanagement through their ignorance of both the best available genetic information from WASSIP (which assumed high CWAK intercept amidst unattained amounts reasonably necessary for subsistence [ANS] and escapement throughout the CWAK region) and their prolonged allowance of extended South Alaska Peninsula June fishery openers and high chum salmon harvest rates despite the best available information.

KRITFC recognizes that intercept in the South Alaska Peninsula June salmon fishery is not the sole cause of CWAK chum salmon declines, but until the Board can manage climate and environmental changes, it must do all in its power to manage anthropogenic fisheries in precautionary, sustainable ways. While in-river subsistence fishing families on the Kuskokwim and other CWAK rivers have been severely or completely limited from harvesting chum salmon – a critical component of our ANS/food security, cultural heritage, and Indigenous ways of life – and in-river chum salmon escapement goals have not been met in three years, commercial fishermen in the South Alaska Peninsula June fishery have been allowed to continue their harvests unabated. There are no further conservation measures that in-river fishing communities can shoulder, and yet, the burden of conservation is not spread equitably to other users harvesting from these same stocks – like Area M commercial fishermen.

[1] See KRITFC, "2022 Kuskokwim River Salmon Situation Report," pg. 9–11, 2022; A. R. Munro et al., "Harvest and harvest rates of chum salmon stocks in fisheries of the Western Alaska Salmon Stock Identification Program (WASSIP), 2007–2009," Alaska Department of Fish and Game, 2012; and M. B. Foster and T. H. Dann, "Genetic stock composition of chum salmon harvested in commercial salmon fisheries of the South Alaska Peninsula, 2022–2026," Alaska Department of Fish and Game, 2022.

[2] E. K. C. Fox et al., "2021 South Alaska Peninsula Salmon Annual Management Report and 2021 Subsistence Fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands Management Areas," Alaska Department of Fish and Game, 2021.

[3] T. H. Dann et al., "Genetic Stock Composition of Chum Salmon Harvested in Commercial Salmon Fisheries of the South Alaska Peninsula, 2022," 28, Alaska Department of Fish and Game, 2023.

The absence of any acknowledgement of the connections between commercial intercept and the viability of CWAK chum salmon escapement and the subsistence way of life; the prioritization of commercial fishery landings over state subsistence priorities and the health of subsistence fisheries; and the sheer lack of any meaningful action by the State of Alaska to bridge management of these fisheries, is inequitable, unsustainable, and inexcusable. It furthermore violates policies and regulations that this Board is obligated to follow, including 5 AAC 39.220 (*Policy for management of mixed stock fisheries*), 5 AAC 39.222 (*Policy for the management of sustainable salmon fisheries*), and 5 AAC 39.223 (*Policy for statewide salmon escapement goals*).

KRITFC demands attention on this issue by the Board, particularly since this fishery is managed by the Board without regard for in-season indicators (such as forecasts or escapement goals) in either Area M or CWAK rivers. With the dismal state of chum salmon abundance in the Kuskokwim, Yukon, and other CWAK drainages, it is imperative that the Board adopt sustainable, conservation-based, and precautionary management policies for the South Unimak and Shumagin Islands June salmon fishery to ensure the survival of CWAK chum salmon and our subsistence way of life.

KRITFC urges the Board to support Proposal 140 as written in its entirety as the most precautionary and scientifically and legally sound proposal before the Board this cycle. When the current *South Unimak and Shumagin Islands June Salmon Management Plan* was instated in 2004, it increased commercial fishing time and expanded the legal fishing districts from its predecessor to the detriment of CWAK chum salmon and in violation of Board and State of Alaska policies and regulations (e.g., 5 AAC 39, 5 AAC 39.222, and 5 AAC 39.223). Proposal 140 would repeal the existing *Management Plan* and replace it with a revised version of the 2001–2003 *Management Plan* that was developed and implemented to mitigate the interception of salmon bound for Western Alaska. Furthermore, **Proposal 140 is a compromise proposal relative to other proposals in front of the Board** (i.e., Proposals 133, 134, 135, 136, 137, 139, and 141) that, if adopted, will meet the sustainable management objectives of this Board and the State of Alaska and allow liberal fishing time and areas in the South Alaska Peninsula June salmon fishery.

KRITFC further urges the Board oppose all proposals that would increase commercial fishing time, areas, or harvests or more efficient gear types in Area M, including Proposals 144, 145, 146, 147, 151, and 152. Adopting these proposals to increase commercial fishing time contradicts the precautionary, sustainable management principles outlined in Board and State of Alaska policies and regulations (e.g., 5 AAC 39, 5 AAC 39.222, and 5 AAC 39.223) and does not reduce potential interception of CWAK chum salmon.

Finally, KRITFC recommends the Board call upon ADFG to **implement in-season, real-time genetic sampling and analysis of Area M chum salmon harvests** as one metric to track the yield and abundance of CWAK chum salmon. If the State of Alaska wishes to manage salmon fisheries with scientifically defensible and current data, including and especially fisheries in CWAK and Area M, it is imperative that it prioritizes the collection, analysis, and timely public distribution of such studies. **The Board and ADFG must also continue discussions with the public, including Tribal entities and subsistence users in Western Alaska, to create**

solutions that further mitigate Area M commercial fishery impacts on CWAK chum salmon stocks.

It is abundantly evident to KRITFC that the survival of our chum salmon stocks, the health of our ecosystems, and the customary and traditional way of life of our people is at stake with continued inaction by the Board. In this time of record-breaking chum salmon declines in Western Alaska, the Board must adopt Proposal 140, reinstall conservative management in this intercept fishery, and do everything in its power to save CWAK chum salmon.

Sincerely,

Dr. Michael Williams Sr.
Chair, KRITFC

Kevin Whitworth
Executive Director, KRITFC

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 140: Support
Proposal 144: Oppose
Proposal 145: Oppose
Proposal 146: Oppose
Proposal 147: Oppose
Proposal 151: Oppose
Proposal 152: Oppose

PC89

Kuskokwim River Salmon Situation Report

DECEMBER 2022

Last updated December 2, 2022

Prepared by the Kuskokwim River Inter-Tribal Fish Commission
P.O. Box 190, Bethel, AK 99559
Ph: (907) 574-0388 | F: 1-907-771-9378 |E: info@kritfc.org
Photo courtesy: Jonathan Samuelson.

Introduction

This situation report documents the current Chinook, chum, and coho salmon disasters on the Kuskokwim River and their impacts on the 33 subsistence-dependent communities in its watershed. The aim of the Kuskokwim River Inter-Tribal Fish Commission (KRITFC) in this report is to communicate the magnitude of our subsistence salmon declines and articulate the critical need for a new conservation-based, ecosystem-wide management approach, particularly in the marine environment. These multi-year, multi-species salmon declines threaten food, cultural, spiritual, and economic security in the Kuskokwim drainage, and they demand attention and immediate action by all management entities.

While this report focuses on the impacts of these salmon stock collapses in the Kuskokwim drainage, we are acutely aware of other watersheds in Western and Interior Alaska experiencing the same, if not more severe, declines. Moreover, this situation report is not meant to diminish our gratitude for the fish we have been able to harvest along the Kuskokwim. Rather, it is meant to be an honest documentation of the experiences of our communities during salmon shortages so we can act effectively and equitably to maintain our fishing ways of life for future generations.

About the Kuskokwim River Inter-Tribal Fish Commission

The KRITFC represents the interests of the 33 federally recognized Tribes of the Kuskokwim River in salmon management, research, and monitoring to protect and sustain our salmon fisheries and traditional ways of life. The work of our 27 Tribally appointed Fish Commissioners, 7 Executive Council members, and 5 In-Season Managers uses both our Yupik and Athabascan Dené Indigenous Knowledge and the best available Western science, and centers our values of unity, sharing in abundance and scarcity, respect for all life, and stewardship for our ancestors and future generations.

At A Glance: The Status of Kuskokwim River Salmon Runs, Subsistence Harvests, & Causes of Decline

- 2022 is the **seventh year in a row of successful collaborative salmon management** between KRITFC and the U.S. Fish and Wildlife Service at Yukon Delta National Wildlife Refuge.
- Chinook salmon escapement goals were met in 2022 because of **continued sacrifices and conservation efforts by Kuskokwim subsistence communities,** who only met about **one-third of their long-term Chinook salmon subsistence harvest needs**.
- **Chum salmon returns remain unprecedentedly low** in the Kuskokwim River, and **2022 is the third year of an alarmingly steep decline of coho salmon**.
- The sockeye salmon run remains strong, but it is not possible to harvest them in large numbers without impacting declined Chinook and chum salmon populations.
- **The 2022 season was the most restricted subsistence fishing season** ever seen on the Kuskokwim.
- With the coho salmon decline, it becomes clear that **Kuskokwim River communities now face a multi-species salmon collapse.** There appears to no longer be any highly abundant "backup" salmon species to fill unmet food security needs.
- Massive intercept catches of chum salmon occurred in the South Alaska Peninsula area (Area M) commercial salmon fisheries during June 2021 and 2022. The most recent and rigorous genetic analysis of samples from these fisheries showed that **Coastal Western Alaska stocks comprised an average of 57% of the chum salmon harvested in Area M, and nearly 1 million Coastal Western Alaska chum salmon were harvested in the two-year period of 2021 to 2022**.
- While the bycatch of Chinook salmon in the Bering Sea-Aleutian Island pollock fishery has declined, chum salmon bycatch remains high, with **no chum salmon bycatch caps** in place by federal managers.

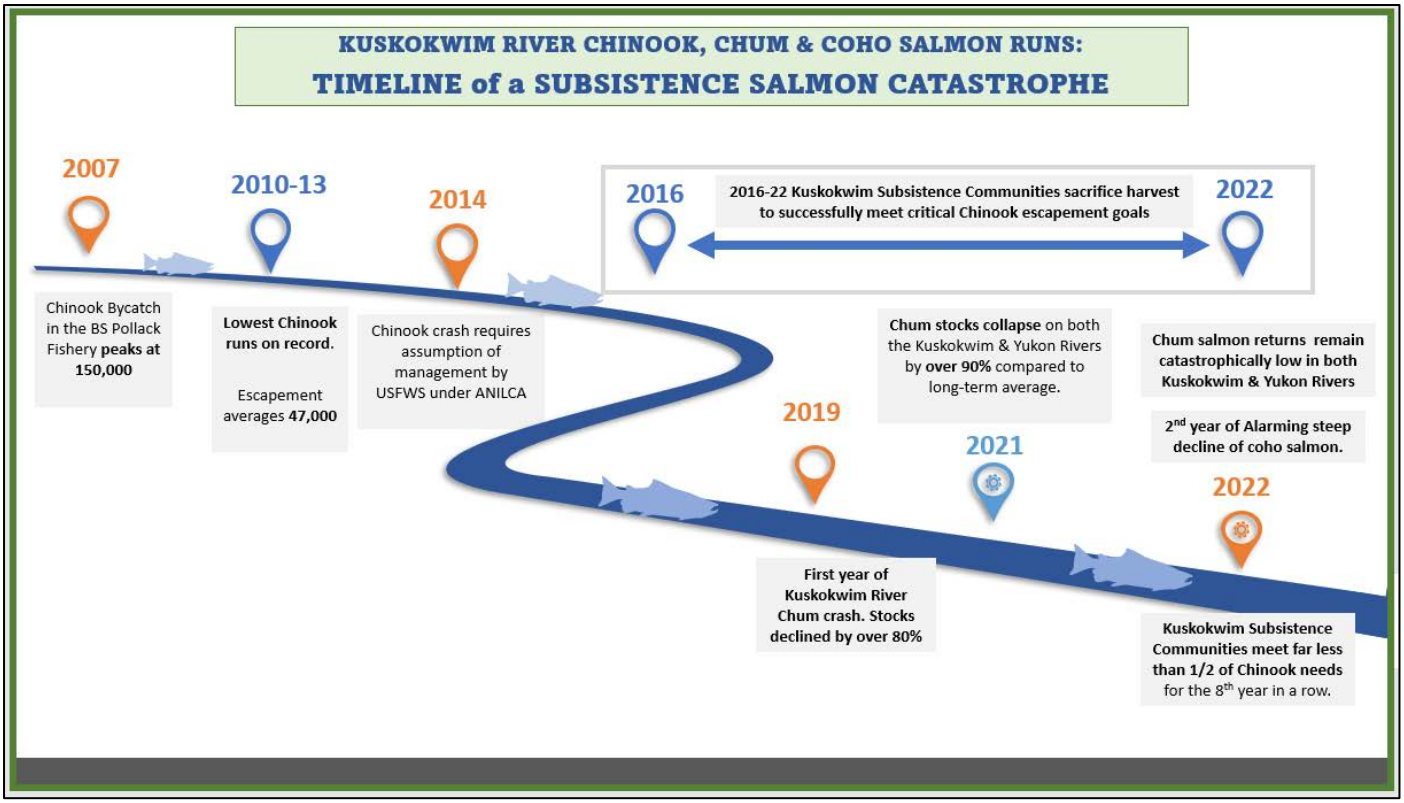

Figure 1: Timeline of a subsistence salmon catastrophe on the Kuskokwim River.

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The Multi-Species Salmon Collapse Threatens Our Well-Being & Way of Life

The Kuskokwim River has historically supported the largest subsistence salmon fishery in the State of Alaska, both based on the number of residents in the 33 villages who participate in the fishery and the number of salmon harvested (Fall et al. 2011). With some of the lowest per capita monetary incomes and highest poverty rates in the state, this region is characterized by a high production of wild foods for local use (Wolfe and Walker 1987).

Over the past thirty years, village residents in the Kuskokwim region have annually harvested over 360 pounds of wild foods per person for human consumption, with fish comprising up to 85% of the total poundage of subsistence harvests, and salmon contributing up to 53% of subsistence harvests (Simon et al. 2007; Wolfe et al. 2011). Residents harvest all five species of Pacific salmon: Chinook, chum, coho, pink, and sockeye. Historically, one out of every two Chinook salmon caught for subsistence in the state was harvested by Kuskokwim River communities. In other words, salmon-dependent communities in the Kuskokwim watershed utilize half of all Chinook salmon harvested for subsistence state-wide.

The importance of salmon, particularly Chinook salmon, to residents extends well beyond nutrition and economy to include socio-cultural identities and a way of life (Ikuta et al. 2013). The Indigenous people of the Kuskokwim – from our Yupik communities at the coast to our Upper Kuskokwim Athabascan Dené Tribes of the Interior headwaters – are, have been, and will always be salmon people. Salmon are essential to our physical, economic, cultural, and spiritual wellbeing.

From the late 1970's into the mid-1990's, the Kuskokwim River saw large runs of Chinook, chum and coho salmon, supporting significant commercial fisheries in addition to meeting subsistence needs in much of the watershed.

For example, between 1990 and 1995, an average of over 1.5 million salmon of multiple species were harvested in the commercial fisheries alone (Figure 2).

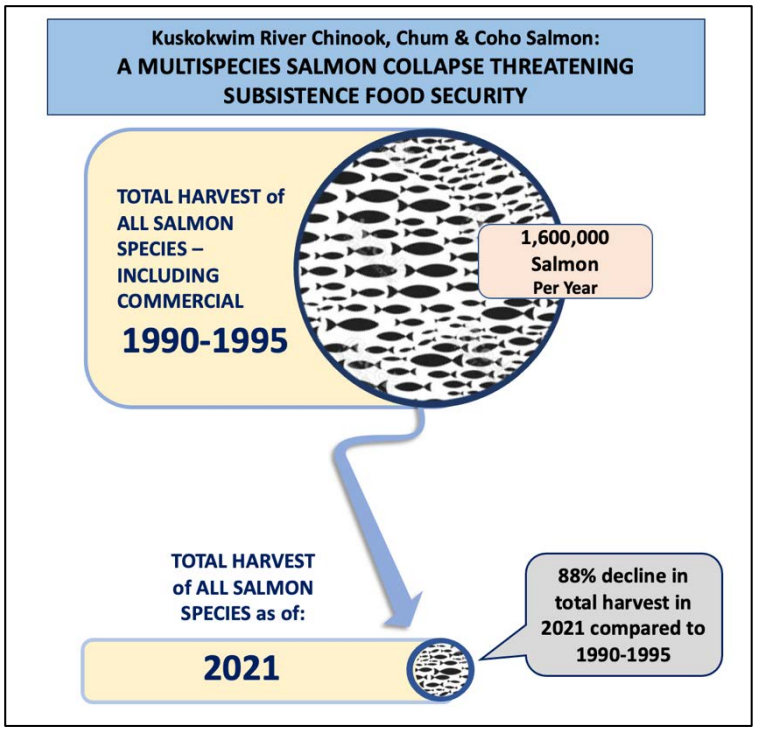

Figure 2: Total subsistence and commercial harvest of all Kuskokwim River salmon species, 1990–1995 compared to 2021.

As of 2022, the Kuskokwim River is experiencing a catastrophic multi-species salmon decline not seen in living memory, and our Elders, youth, and entire communities are suffering because of it. Since at least 2009, subsistence-dependent communities in the Kuskokwim drainage have witnessed steep declines in their salmon populations, beginning with Chinook salmon and now, within the past three years, extending to chum and coho salmon (Figures 1 & 2).

Due to the multi-species nature of the salmon collapse and the complete closure of much of the coho salmon run, the 2022 season was the most restricted subsistence fishing season ever seen on the Kuskokwim.

The State of Alaska Department of Fish and Game (ADF&G) closed all subsistence gillnet fishing in the flowing waters of the Kuskokwim River from August 17 through September 15, including fishing for non-salmon fishes. Because of prolonged conservation closures, subsistence fishing families not only faced salmon harvest restrictions, but also experienced challenges harvesting whitefish and other non-salmon species that are critical for traditional diets and well-being.

In the recent past, the subsistence harvest of chum and coho could help make up for the absence of Chinook salmon. This was not possible in 2022 with the steep decline of coho salmon on top of the Chinook and chum crashes. And, while sockeye salmon have increased in abundance, it is not possible to target them without potentially overharvesting the declined Chinook and chum populations present in the river at the same time. Kuskokwim River communities are realizing that there is no longer any "backup" salmon species to fill unmet salmon needs, leaving us with a heavy reliance on whitefish, moose, and other subsistence resources, as well as on store-bought foods of significantly less nutritional and cultural value. These current dramatic multi-species salmon declines are thus threatening food security and overall well-being within the Kuskokwim region, as well as the health of our drainage-wide ecosystem.

Impacts of the Prolonged Chinook Salmon Crash (2009–2022)

Since at least 2009, the Chinook salmon (king salmon, *kiagtaq, taryaqvak, gas, Oncorhynchus tshawytscha)* populations in the Kuskokwim River have crashed and remain severely depressed through the 2022 season. Many fishing families in upriver communities, including Nikolai, McGrath, and Takotna, reported Chinook salmon declines dating back to 2000 when average household harvests decreased to approximately half of what they had been in the 1990s.

The preliminary 2022 Kuskokwim River Chinook salmon total run estimate shows a midpoint of about 143,600 fish, and an estimated escapement of about 105,700 fish (though preliminary estimates are considerably uncertain because poor weather prevented aerial surveys) (Rabung 2022). The 2022 estimate is about 41% below the long-

term total run average from 1976 to 2009 (Figure 3). During the run, subsistence-dependent communities were heavily regulated with very few limited harvest opportunities per week and net size and gear restrictions to try to meet the critical escapement goals. As a result of the sacrifices of subsistence users working to rebuild the Chinook salmon stocks, the drainage-wide Chinook salmon escapement goal (65,000–120,000 fish) has been achieved every year that KRITFC and U.S. Fish and Wildlife Service at Yukon Delta National Wildlife Refuge (YDNWR) have collaboratively managed the run, including 2022.

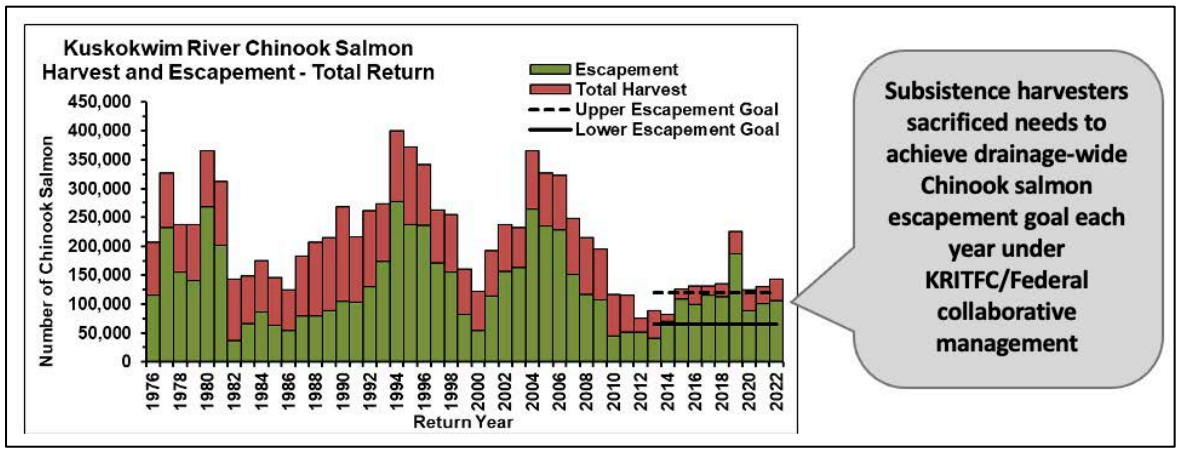

Figure 3: Kuskokwim River Chinook salmon escapement and total harvest by all user groups, 1976–2022. Note: 2022 data is preliminary. Source: Rabung 2022.

Despite Chinook salmon escapement goals being met throughout the period of KRITFC–YDNWR co-management, the Kuskokwim River Chinook salmon run remains concerning because of the inability to maintain expected historic yields, or harvestable surpluses, above the stock's escapement needs, despite the use of specific management measures. As a result, Kuskokwim River residents have not been able to meet their long-term harvest levels – termed amounts reasonably necessary for subsistence (ANS) by the Alaska Board of Fisheries (BOF) – of 67,200–109,800 fish since 2010 (Figure 4).

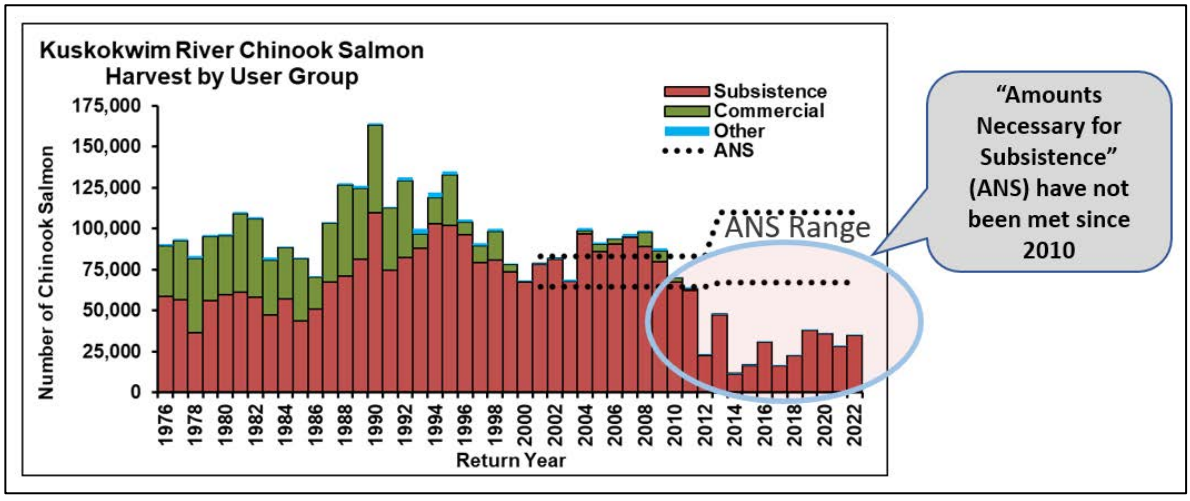

Figure 4: Kuskokwim River Chinook salmon harvest by user groups during 1976—2022, showing that long-term subsistence harvest needs (based on ANS) in the watershed have not been meet since 2010. Note: 2022 data is preliminary. Source: ADF&G AYK Database Management System.

While post-season household harvest surveys have yet to be conducted to estimate total salmon harvests during the 2022 season, based upon the in-season community-based harvest monitoring program operated by KRITFC, Orutsararmiut Native Council, and YDNWR, we estimate at this time that residents of the Kuskokwim River met only about one-third of their average long-term Chinook salmon harvest needs. Moreover, as the average size of Chinook salmon returning to the Kuskokwim has decreased, subsistence fishers are not only harvesting fewer numbers of fish but fewer total pounds of fish (Ohlberger et al. 2018). This compounds the food security crisis already unfolding with declined Chinook salmon stocks and restricted harvest opportunities.

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> June 16 was not a good day. Many Kalskag fishermen started at 6:00 am or 8:00 am and fished for eight to ten hours, with a range of zero to five Chinook salmon caught. One person caught ten kings after fishing almost the whole opener. Some are waiting because they can't afford to spend the whole day out for one or two fish. It was a hard day.
> *Megan Leary, Aniak*
> *(Native Village of Napaimute)*

Continued Recent Chum Salmon Crash (2020–2022)

Chum salmon (dog salmon, *aluyak, iqalluk, neqepik, srughot'aye, O. keta)* have been especially important for food security during years of poor Chinook salmon returns. Because of their lower fat content, they also provide unique traditional foods that cannot be prepared with other salmon species. While chum salmon harvests have declined in recent decades resulting from changes in customary and traditional use patterns, including fewer dog teams in the region, they are highly sought for preparing traditional delicacies like *eggamarrluk* (half-dried, half-smoked salmon) and for Elders and other family members who cannot consume fattier salmon species.

However, in 2020, 2021, and 2022, Kuskokwim chum salmon returns crashed unexpectedly. The 2022 chum salmon run appears to be the second lowest chum salmon return on record, better only than the 2021 return (Figure 5). Chum salmon used to return to middle and headwaters tributaries in the millions, feeding more than just human subsistence users, but bears, vegetation, and other life. The lack of chum salmon in tributary valleys has the potential to significantly affect the health of the Kuskokwim ecosystem.

Moreover, because in-season data showed a weak chum salmon return, Kuskokwim subsistence-dependent communities were restricted from harvesting chum salmon through area and gear type closures. For the second year in a row – and the second year in living memory – subsistence gillnet fishing in the lower Kuskokwim River remained closed through the majority of July, preventing families from being able to efficiently harvest sockeye salmon and non-salmon fish species to store food for the winter.

As a result of this crash and harvest restrictions to meet escapement and conservation goals, subsistence harvests of chum salmon in the Kuskokwim River from 2020 through 2022 have been well below the ANS range of 41,200–116,400 fish designated by the Alaska BOF, representing some of the poorest harvests on record.

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> On June 22, I caught only five chums; most people are catching five to ten. People are calling them 'precious.'
> *Mike Williams Sr., Akiak (Akiak Native Community)*
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> When I first came to Aniak in the 1960s, there were people who made their money off fur in the winter and fish in the summer; that's how they could buy a new outboard or net. They were able to do that because the chum salmon went up the Aniak valley to die. Elders talk about the stink up there, and the first year we had a sonar on the Aniak, we had a million chums up there; but no longer. We should think of chums as the sponsor of marine-derived nutrients and make sure we don't downplay this.
> *LaMont Albertson, Aniak*

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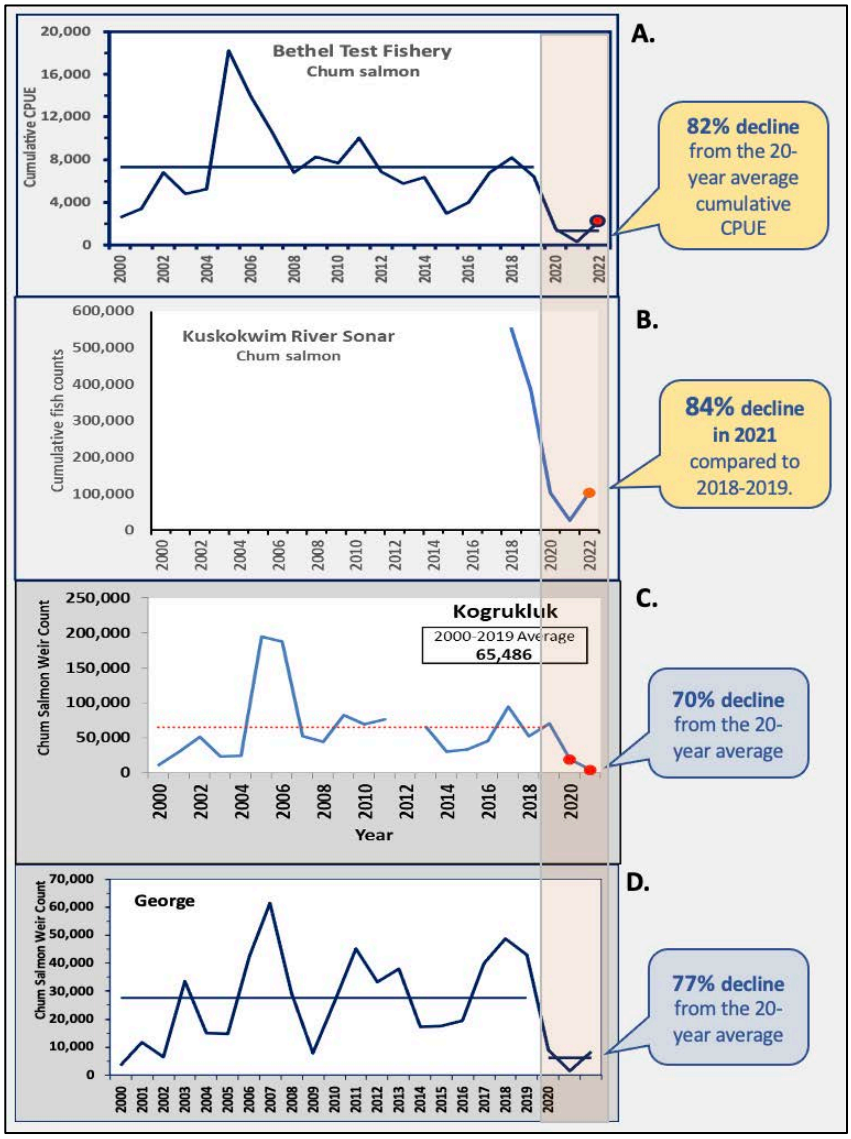

Figure 5: Evidence of low 2020 - 2022 Kuskokwim River chum salmon abundance:

A. Cumulative end-of-season catch per unit effort (CPUE) of chum salmon caught in the Bethel Test Fishery, 2000-2022.
B. Cumulative annual counts of chum salmon from the Kuskokwim River sonar project, 2018-2022.
C. Kogrukluk river weir, 2000-2021.
D. George River weir, 2000-2022.

Source: ADF&G AYK Database Management System.

Unprecedented Coho Salmon Crash (2022)

Coho salmon (silver salmon, *ciayuryaq, caayuryaq, uqurliq, qakiiyaq, nosdlaghe, O. kisutch*) are the last salmon species to return to the Kuskokwim each season. With the run beginning toward the end of July and continuing until ice covers the river, coho salmon provide Kuskokwim fishing communities with their final opportunities to meet their subsistence salmon needs.

In the past, Kuskokwim River coho salmon returns appeared to be highly productive, supporting both commercial and subsistence fisheries. During the 1990s, commercial harvests of coho salmon averaged around 460,000 fish per year, with a peak harvest of nearly 1 million coho salmon in 1996. However, this large commercial fishery was managed without a reliable in-season estimate of abundance or post-season run reconstruction, meaning there was no method for ADF&G managers to assess the long-term sustainability of this commercial fishery.

Unlike the commercial fishery, long-term coho salmon subsistence harvests until 2018 averaged and remained relatively stable around 35,000 fish. With ongoing Chinook and chum salmon declines, river-wide dependence on

coho salmon to meet subsistence needs is especially strong. Many families rely on coho salmon to fill their freezers, jar smoked strips, and taste the last fresh salmon of the season.

Available long-term run assessment data from the Bethel Test Fishery (BTF) show that the Kuskokwim River coho salmon run has declined significantly since 2018 (Figure 6), which corresponds with coho conservation concerns voiced by Kuskokwim residents in recent years at the State of Alaska's advisory body, the Kuskokwim River Salmon Management Working Group. BTF cumulative coho salmon catch-per-unit-effort (CPUE) has dropped 54% in the past four years. As a result of these declines, the coho salmon ANS of 27,400–57,600 fish was not met in 2018, 2020, 2021, or 2022.

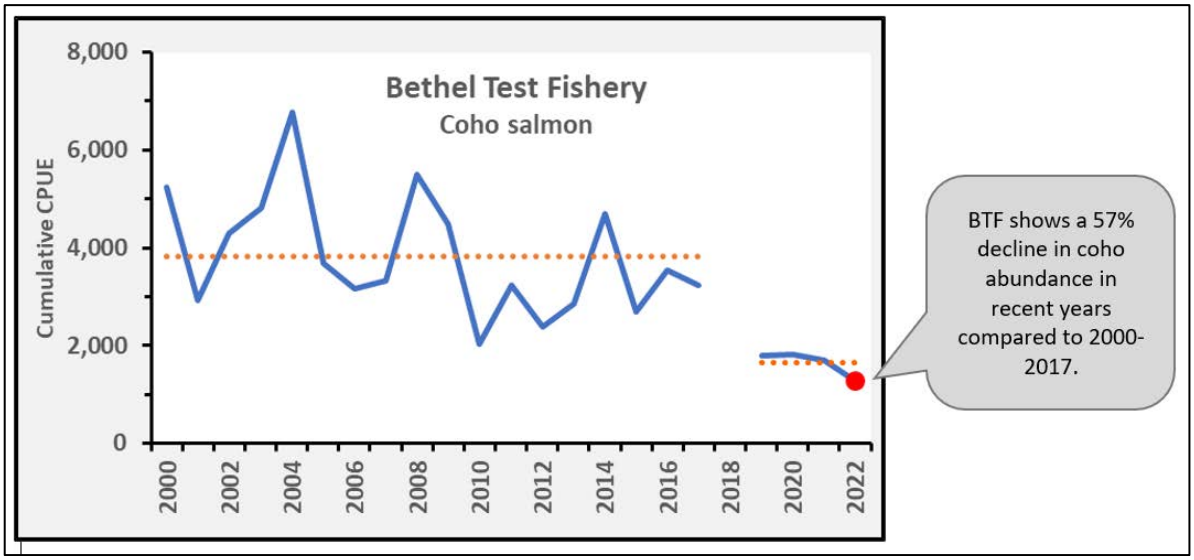

Figure 6: Cumulative end of season CPUE of coho salmon caught in the Bethel Test Fishery, 2000-2022, showing a steep decline in coho salmon runs for the past four years. The 2019–2022 average CCPUE was 57% below the 2000–2017 average. Source: ADF&G AYK Database Management System.

Despite recent years of steep coho salmon declines, ADF&G managers did not act until 2022, when they implemented a drainage-wide closure of the Kuskokwim from mid-August to mid-September to protect a record-low coho salmon return. This drainage wide closure effectively shut down all subsistence fishing, including the use of smaller-sized mesh nets targeting whitefish and the use of selective non-gillnet gear types, that resulted in severely harming subsistence communities by the lack of reasonable opportunity to harvest non-salmon species.

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> I'm really saddened and devastated for our Tribal families upriver who haven't had a chance to catch Chinook or chum salmon, and we don't get reds up here. Now there's no silver fishing. The people that live a subsistence lifestyle up here are going to be hit really hard. It was open downriver, but the fish take two or more weeks to get upriver. By the time the silvers were up here this year, we were closed and couldn't fish. It's devastation up here.
> *Betty Magnuson, McGrath (McGrath Native Community)*
>
> Everybody is caught off-guard by the silvers. A lot of people upriver who were waiting for the silvers to arrive do not have any chance for that. With the closures, we also effectively have no access to the fall whitefish and any other fish that people need to put away for the winter.
> *Jonathan Samuelson, Georgetown (Native Village of Georgetown)*

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Commercial Intercept & Bycatch Impacts on Critically Declined Western Alaska Salmon Stocks

Many potential factors have cumulatively caused declines in Coastal Western Alaska (CWAK) salmon populations. Salmon bycatch and interception in marine fisheries, while not the sole driver of current poor salmon returns to the Kuskokwim, undeniably impacts salmon stocks in this region and is a driver that is directly under human control. However, unlike many drivers of declines, humans can directly and effectively influence salmon bycatch and intercept levels – a particularly crucial power during present-day collapses in subsistence salmon fisheries. Moreover, the 33 Tribes of the Kuskokwim River share Indigenous values associated with deep respect and gratitude for subsistence foods, and the excessive waste of bycaught salmon is deeply offensive to the Tribal stewardship principles practiced by the subsistence cultures in the watershed.

At A Glance: Impacts of Commercial Salmon Interception & Bycatch

- **Both the South Alaska Peninsula (Area M) salmon fishery and the Bering Sea pollock fishery** are documented contributors to the severe chum salmon crash impacting communities throughout the Coastal Western Alaska region.
- The most recent and rigorous genetic analysis of samples from these fisheries found an average of **57% of the documented Area M chum salmon catch in June** were of Coastal Western Alaska origin**.**
- **Huge numbers of chum salmon** bound for Western Alaska rivers were harvested in the Area M fishery in recent years. A combined total of **nearly 1 million Coastal Western Alaska chum salmon were harvested in the two-year period of 2021 to 2022**.
- Chum salmon bycatch of Western Alaska stocks in the Bering Sea pollock fishery in 2021 was significant but smaller compared to the harvest in the Area M fishery. For comparison, in recent years the **Area M harvest of Coastal Western Alaska stocks has been 10 times larger than the Bering Sea bycatch of those same stocks.**
- **The South Alaska Peninsula fishery has profited** for more than 100 years off the sustained productivity of distant salmon stocks – especially the Yukon and Kuskokwim River chum salmon stocks, which were the most abundant stocks in the Coastal Western Alaska region prior to the current crash.
- There is **currently no limitation or cap on the number of Western Alaska chum salmon** that can be caught and sold in Area M or caught and discarded in Bering Sea pollock fishery, regardless of the impacts to spawner escapement or food security threats in the salmons' regions of origin.
- Fundamentally, both **state Area M harvest management and federal bycatch management are disconnected from** in-river stock assessments, escapement monitoring, and other best management practices to ensure sustainability of our Western Alaska salmon stocks that are harvested in these marine fisheries.
- Both state and federal policy declare that meeting salmon escapement goals and providing for subsistence uses are to be prioritized over commercial harvests. However, in practice, the current management regimes under **both North Pacific Fisheries Management Council and Alaska Board of Fisheries effectively prioritize commercial uses** over Western Alaska escapement needs or subsistence uses. For example, in 2021, when chum salmon harvests were severely restricted on the Kuskokwim and not allowed on the Yukon, **over 740,000 Western Alaska chum were legally caught** between both the Area M fishery and the Bering Sea pollock fishery.

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South Alaska Peninsula (Area M) Interception of Western Alaska Chum Salmon

The South Alaska Peninsula Management Area, more commonly known as a portion of Area M, neighbors the Chignik and Bristol Bay areas along the Alaska Peninsula and eastern Aleutian Islands (Figure 7). Managed by ADF&G, Area M is an intercept fishery that has operated since at least the early 1900's targeting all salmon species as they pass through the fishery.

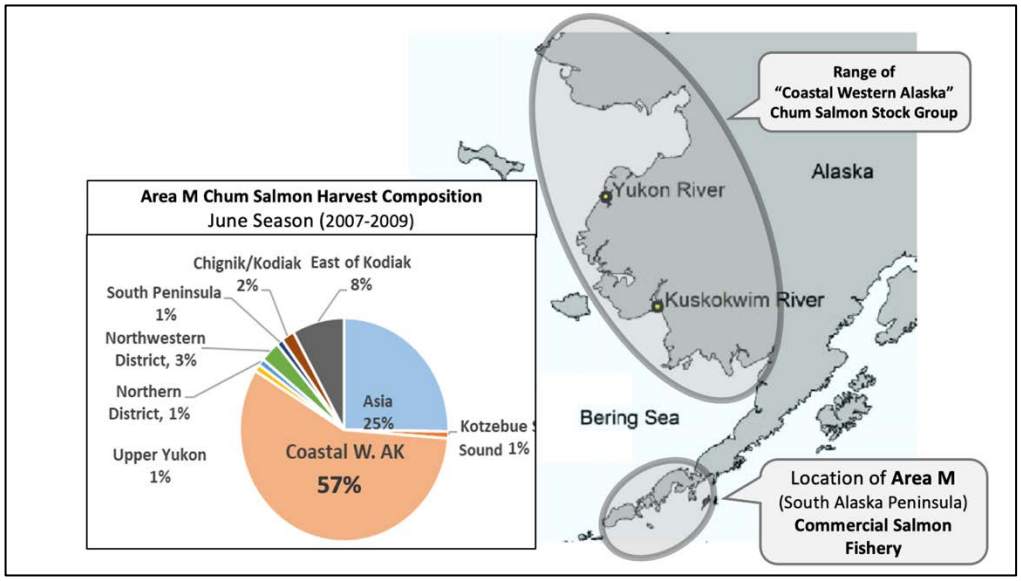

Figure 7: Map of South Alaska Peninsula intercept fishery with inset showing the average genetic composition of chum salmon caught in commercial fisheries there during June 2007–2009 as reported by WASSIP.
Source: Munro et al. 2012.

Arctic-Yukon-Kuskokwim (AYK) region immature chum salmon stocks travel to the Gulf of Alaska and North Pacific to rear and mature. As the salmon begin to mature in late winter and spring and migrate to their natal rivers to spawn, they must travel through the island passes at the end of the Alaska Peninsula (Figure 7). The Area M fishery is located in these island passes, which create natural bottlenecks, concentrating chum salmon stocks and making them more vulnerable to commercial fishing interception. Unlike salmon bycatch in pollock fisheries of the Bering Sea, where salmon are designated as a prohibited species that cannot be sold, harvesters in Area M can catch and sell as many salmon as possible during the ADF&G managed openings, regardless of where these salmon originate.

Districts in the South Alaska Peninsula – specifically the commercial fisheries in the South Unimak and Shumagin Islands – are a primary concern to Yukon and Kuskokwim subsistence harvesters. During the month of June, commercial fishing vessels in these Area M districts intercept and sell large numbers of chum salmon bound for the AYK region at a rate nearly 10 times more impactful than chum salmon bycatch in the Bering-Sea Aleutian Islands pollock trawl fishery (Figures 8 & 9).

For decades, fishermen from the Kuskokwim and other AYK rivers have urged the Alaska BOF and ADF&G to manage the South Unimak and Shumagin Islands June fishery to avoid intercepting AYK-bound salmon. A previous study (Seeb and Crane 1999) to explore genetic composition of South Alaska Peninsula resulted in a seasonal harvest cap which expired long ago. Continued public outcry led to the creation of the Western Alaska Salmon Stock Identification Program (WASSIP) to further identify the origin of stocks that the Area M fishery depends on.

The Coastal Western Alaska (CWAK) chum salmon genetic stock grouping includes the Kuskokwim, Yukon, Norton Sound, Kotzebue, and Bristol Bay regions, which, at this time, cannot be genetically differentiated. Based

on genetic analysis of samples from the commercial salmon fishery in the South Alaska Peninsula during 2007–2009, WASSIP showed that CWAK stocks comprised an average of 57% (range 52%–60%) of the chum salmon harvested (Munro et al. 2012; Foster and Dann 2022; Figure 7). This agreed well with the average of 57% observed in June 1993–1994 by Seeb and Crane (1999; range 15%–72% over periods and years).

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> Again, it’s subsistence users as the ones trying to save them. Without my dog team, I don’t take many fish. Some people want to put restrictions on commercial fishing for a bit so the fish come back, but they’ll never stop commercial fishing in the ocean because it’s called ‘progress.’ They say they feed the world. I always say, look what happened to the East Coast, West Coast, and now it’s up here: There’s no more fish. History repeats itself.
>
> *Robert Lekander, Bethel (Orutsararmiut Native Council)*

These analyses of stocks of origin conducted 14 years apart suggest considerable stability in the proportion of CWAK chum salmon in the South Alaska Peninsula commercial intercept fishery during the period 1993-2007. The rationale for assuming CWAK chum salmon currently continue to comprise the majority of the Area M June chum salmon harvest is based on the evidence that Kuskokwim salmon stocks, which rear in the Gulf of Alaska, must pass through the Area M region, making them highly vulnerable to harvest regardless of their total abundance.

It is important to note that these studies are based on sampling of chum salmon after they have been caught at sea and then delivered to the processor. There is significant uncertainty in the number of chum salmon that are landed, discarded or released, and not reported in the Area M fishery. Chum salmon caught and released, rather than harvested, by these commercial vessels are highly unlikely to survive and thus will not return to their natal streams to spawn. Impact rates based on documented harvest and genetic studies are therefore conservative estimates at best.

WASSIP findings at the time showed that despite the large proportion of chum in the Area M fishery 2007–2009, the harvest rate on CWAK chum salmon was fairly small compared to total returns in their rivers of origin (Munro et al. 2012). With current declines in AYK rivers, the impact is clearly more pronounced. Based on our estimate of the likely number of CWAK chum salmon harvested in the commercial salmon fisheries during the month of June from 1980–2021, the harvest of Kuskokwim and other AYK region chum salmon stocks in this intercept fishery in recent years has been massive (Figure 8).

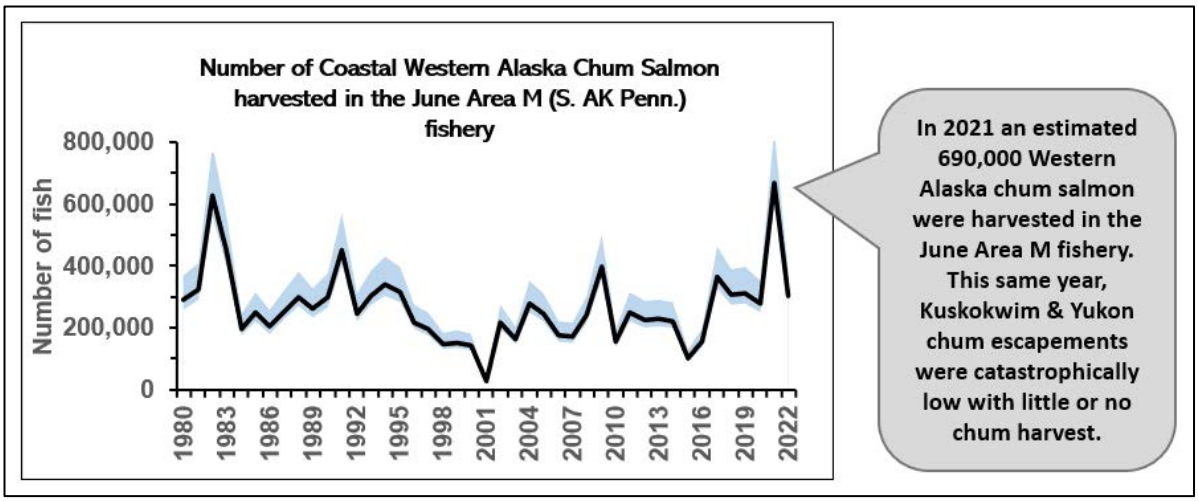

Figure 8: Estimates of the number of Coastal Western Alaska and Yukon River chum salmon harvested in the during the month of June 1980–2021. Data are derived from genetic analysis of chum salmon in the South Alaska Peninsula salmon fisheries sampled in 1993–1994 and in 2007–2009. The solid line shows the mean estimate of (57% of all harvest), and the shaded area shows the plausible range (51%–72%). Source: Seeb and Crane 1999; Munro et al. 2012; Fox et al. 2022.

In 2021 alone, an estimated 690,000 chum salmon bound for Western Alaska rivers were harvested in the June South Alaska Peninsula. (Figures 8 & 9). With a preliminary 2022 chum salmon harvest of over 544,000 fish, a combined total of nearly 1 million CWAK chum salmon were harvested in this commercial fishery between 2021 and 2022. For comparison, that is larger than the total combined estimated chum salmon in-shore returns (or, the harvest and escapement in-river of the total year's run size) in 2021 to both the Yukon *and* Kuskokwim Rivers.

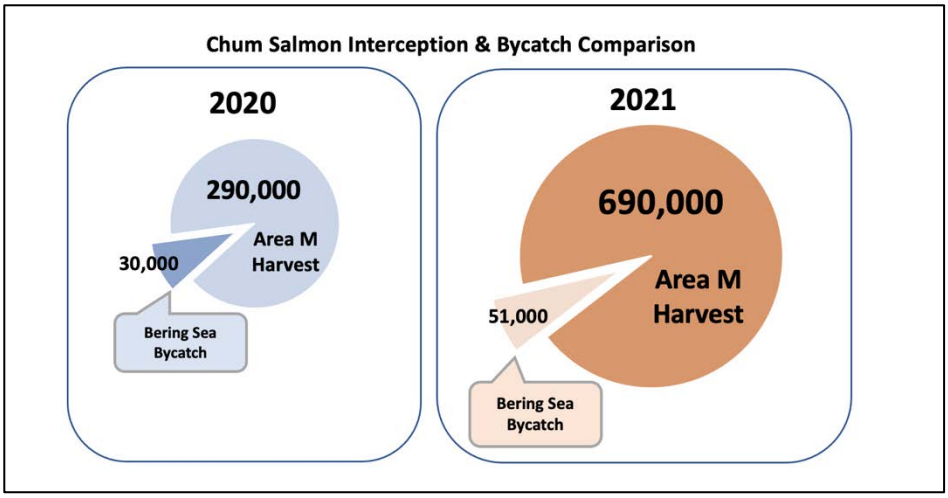

Figure 9: Catch of chum salmon from Coastal Western Alaska and the Middle- and Upper-Yukon in the BSAI pollock fishery (small pie slice) and the Area M South Alaska Peninsula salmon fisheries (remaining portion of pie) in 2020–2021. Stock composition source: Seeb and Crane (1999) and Foster and Dann (2022).

Bycatch of Western Alaska Chinook and Chum Salmon in the Bering Sea Pollock Fishery

Bycatch, or the unintended catch of one species while targeting another, also accelerates AYK region salmon declines, including on the Kuskokwim. In the Bering Sea–Aleutian Islands (BSAI) management area, the commercial pollock trawl fishery accounted for 99% and 87% of all 2021 chum and Chinook salmon bycatch, respectively (NOAA 2022). These salmon, many of which are bound for the Yukon and Kuskokwim drainages, are not the target of the pollock fleet. Because of this, Chinook and chum salmon caught by the pollock fishery cannot be sold but must be discarded or donated.

The North Pacific Fishery Management Council (NPFMC) manages chum and Chinook salmon as prohibited species catch in Alaska, meaning they cannot be targeted or sold by federally managed commercial fisheries. In response to record-high chum and Chinook bycatch levels from 2003–2007, the NPFMC implemented Chinook salmon bycatch caps, based on prior year salmon returns to the Kuskokwim, Upper Yukon, and Unalakleet rivers, as well as salmon avoidance incentives for the commercial fleet.

The establishment and strict enforcement of bycatch caps and full observer coverage on-board vessels appear to be effective in significantly reducing Chinook bycatch in recent years. An estimated total of 126,104 Chinook salmon from CWAK rivers were caught as bycatch in the BSAI pollock trawl fishery 2011–2020 (annual average: 12,610 salmon). While there are no new genetic analyses of bycatch since 2020, as of December 1, 2022, over 8,300 Chinook salmon have been caught as bycatch in 2022 directed BSAI commercial fisheries, and over 6,000 of those were caught and discarded by non-community development quota program (CDQ) commercial pollock vessels (NOAA 2022).

CWAK Chinook stocks comprise the largest portion of Chinook salmon bycatch in the BSAI pollock fishery most years, especially during the A-season (January 20 to April). From 2011 to 2020, CWAK stocks averaged over 44% of the estimated Chinook salmon bycatch, and over 60% of bycatch in some years (Guthrie et al. 2022). From 2017 to 2020, the relative proportion of CWAK stocks caught in the pollock fishery increased from 24% to 52% of Chinook salmon bycatch (Figure 10).

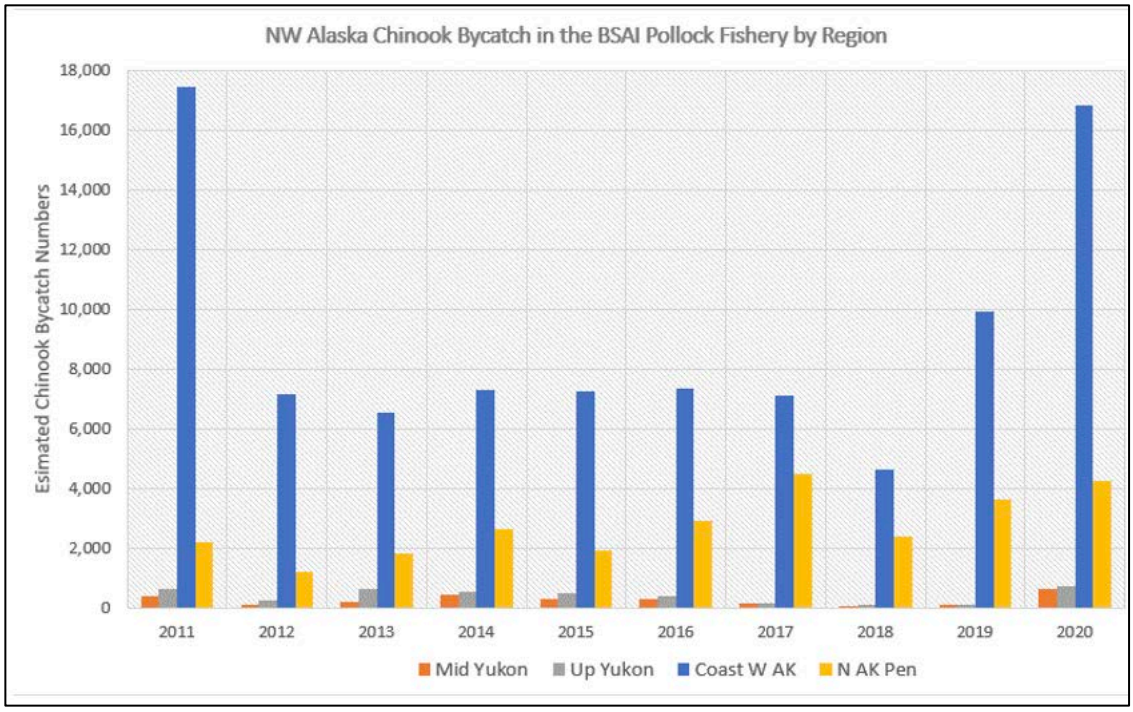

Figure 10: Estimated Chinook salmon bycatch numbers in the BSAI pollock fishery 2011–2020 by northwest Alaska region, with bars showing the origins of different regional stock groupings. This graph shows only up to year 2020, when the latest genetic analysis and reporting took place. Source: Guthrie et al. 2022.

Chum salmon bycatch in the Bering Sea, primarily occurring in the B-season (June 10 to November), increased dramatically after 2011 (Figure 10). The CWAK rivers accounted for approximately 9% of chum incidentally caught in the 2021 BSAI B-season pollock fishery, and an annual average of 37,423 salmon were caught as bycatch during 2011-2021 (Barry et al. 2022; P. Barry, NMFS, pers. comm.).

Genetic analyses from recent years confirm that Western Alaska, Upper/Middle Yukon, and Southwest Alaska chum salmon stocks are impacted by pollock trawl bycatch annually. A very low proportion of Upper/Middle Yukon chum salmon were caught in BSAI B-season pollock fishery in 2020 and 2021, which may have been an early indicator that the Upper/Middle Yukon chum salmon are experiencing a decline in stock status. In-season data from 2022 shows over 245,000 chum salmon across all genetic reporting regions have been taken as bycatch through December 1, 2022, with over 242,000 fish taken as bycatch by non-CDQ commercial pollock vessels (NOAA 2022).

> “
>
> We need to look at both ends, from the beginning of the routes of the salmon to the headwaters spawning grounds. Are we conserving salmon for the people in the high seas fisheries and Alaska Peninsula fisheries that are intercepting our fish?
>
> *James Nicori, Kwethluk (Organized Village of Kwethluk)*

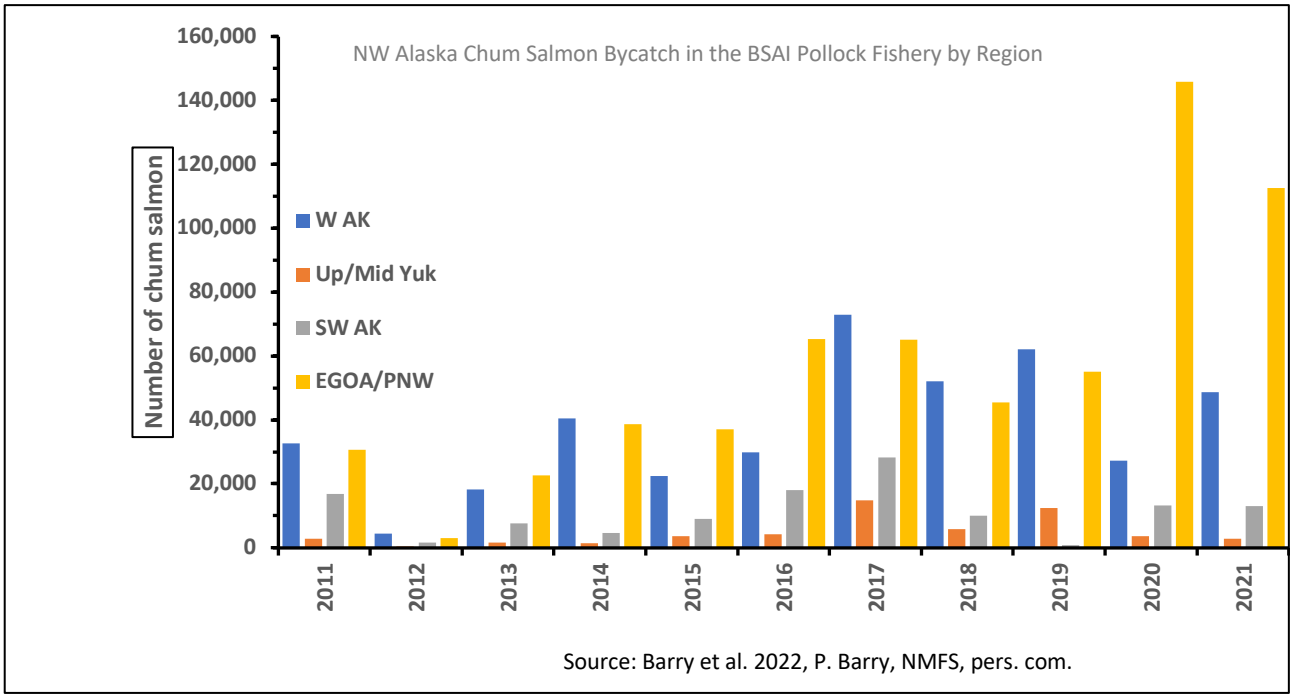

Figure 11: Estimated chum salmon bycatch in the BSAI pollock fishery, 2011–2021 showing bycatch composition by Eastern Pacific reporting group. Source: Barry et al. 2022; P. Barry, NMFS, pers. comm.

Salmon Intercept and Bycatch Management Concerns

Given the combined impacts of the Area M intercept fishery and BSAI salmon bycatch on AYK chum salmon stocks, it is of grave concern that neither the Alaska BOF nor NPFMC have demonstrated any willingness in recent years to take action to limit the take of Western Alaska chum salmon in the fisheries they manage. Moreover, both state and federal agencies have fragmented systems and prioritize commercial fishery profit over meeting spawner escapement and subsistence harvest needs.

A root problem with NPFMC management of BSAI salmon bycatch and ADF&G management of the South Alaska Peninsula June chum salmon intercept fishery is their disconnection from Kuskokwim and Yukon rivers in-river stock assessments, escapement monitoring, and other best management practices to ensure sustainability of distant stocks that are harvested in this intercept fishery.

For example, ADF&G managers in the AYK region repeatedly claim that they have no authority nor obligation to coordinate with Area M managers to ensure that the Area M fishery is not overharvesting chum salmon stocks essential for escapement and subsistence uses within AYK rivers,. ADF&G has also been reluctant to fund updated genetic data collection following the end of the WASSIP program in 2009. Earlier this year, Governor Dunleavy tasked ADF&G with initiating an Area M genetics update only after the public pressure prompted the State legislature to allocate funding for updated genetic stock identification analysis for the years 2022 to 2026. It is not the fault of Western Alaska subsistence fishing communities for the State's lack of prioritization to protect AYK-bound chum salmon, yet they are the ones suffering because of it.

In the BSAI pollock fishery, there is currently no cap or limit on the amount of chum salmon that the pollock fleet can take as bycatch, despite sustained pressure from AYK region Tribes and subsistence users on NPFMC decisionmakers, most recently at the June 2022 NPFMC meeting.

Regulations written in the Alaska BOF policy and federal Alaska National Interest Lands Conservation Act (ANILCA) declare that meeting escapement needs and providing for subsistence uses are to be prioritized over commercial harvests in both state and federal fisheries. However, in practice, the current management regimes under both the Alaska BOF and NPFMC effectively prioritize commercial uses over Western Alaska salmon escapement needs or subsistence uses. For example, in 2021 – when Kuskokwim chum salmon harvests were severely restricted and Yukon River communities were allowed no harvest opportunities for the entire season – over 740,000 Western Alaska chum salmon were legally caught between both the Area M fishery and the Bering Sea pollock fishery (Figures 7 & 9).

Thus, while subsistence communities on the Kuskokwim and throughout the AYK region are forced to sacrifice their local harvests to help meet escapement goals essential for sustainable salmon management and stock rebuilding, state and federal managers are prioritizing commercial yield and profit. ADF&G and the Alaska BOF solely focus on allocating and managing the commercial harvest among different subdistricts in Area M; meanwhile, escapement and subsistence needs in AYK rivers that have produced the majority of the salmon intercepted in this lucrative fishery for over 100 years are disregarded by Area M managers. BSAI pollock fishing vessels have no mandates to avoid chum salmon bycatch and the NPFMC continues to manage their fishery with a single-species, profit-driven lens.

Inequitably, the entire burden of conservation is being carried by subsistence fishing communities as downstream harvesters in Area M and marine vessels in the BSAI are focused on maximizing harvest and profits while in-river subsistence harvesters face restrictions to meet escapement goals.

> “
>
> I'm worried about the farther-up people, those upriver, who wait around to catch their fish. They don't meet their needs, and sometimes I think, How can we help the upper river people get fish?
> *Ralph Nelson, Napakiak*
> *(Native Village of Napakiak)*
>
> Some people still get fish and hang them, but it seems like the subsistence way of life is dying. There used to be a lot of fish camps, but now they're run-down, hardly anybody there. Some families sold their property. It's sad. These people gave up their fish camps. The new generations fish less.
> *Paul Cleveland, Quinhagak*
> *(Native Village of Kwinhagak)*
>
> We can't give up. We've got to work together, remember where we came from, help each other, and help our people to work together.
> *James Nicori, Kwethluk*
> *(Organized Village of Kwethluk)*

Moving Forward: The Necessity of Collective Conservation & Restoration Efforts

The Kuskokwim River watershed is facing a food security and ecological crisis, given the river-wide declines in Chinook, chum, and coho salmon. This crisis, brought on by the cumulative effects of cross-regional overharvest, unsustainable management, climate change, and other factors, threatens a total collapse of our ecosystem and Indigenous way of life.

Local subsistence users are currently the only users bearing the brunt of conservation and supporting salmon stock rebuilding efforts. Unfortunately, conservation in a mixed-stock fishery means that Alaska Native subsistence users – who rely on salmon for our physical, spiritual, cultural, and economic wellbeing – are unable to fish for healthy runs of sockeye salmon or non-salmon species like whitefish while protecting species of concern.

In-river harvest restrictions imposed upon traditional and customary harvesters of these fish should be a last resort for managers, yet they are currently the only real conservation efforts in place. Salmon originating in the Kuskokwim drainage migrate through many other jurisdictional boundaries during their lifetimes, but instead of approaching salmon conservation from a cross-boundary, ecosystem-centered perspective, agencies maintain management divisions and restrict the fishing communities who depend on salmon to thrive – and who continue to steward the spawning grounds as they have since time immemorial.

Rebuilding and carefully stewarding our salmon runs throughout their lifecycle through co-management, conservation, and community-based monitoring remains our goal. This is critical as the effects of this crisis are not isolated to the Kuskokwim Region. The sustainability, health, and productivity of Alaska's fisheries, like Area M and the Bering Sea, depend on the careful management of populations elsewhere. It is imperative for all harvesters, managers, executives, and agencies, whether in or out of the Kuskokwim region, to contribute to Western Alaska salmon restoration efforts. Only our collective efforts can halt the decline of our subsistence fisheries that are critical to the wellbeing of this ecosystem and our way of life.

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PC90

Agdaagux Tribe of King Cove
P.O. Box 249
King Cove, Alaska 99612
phone 907.497.2648 fax 907.497.2803
atc@arctic.net

February 3, 2023

Board of Fisheries

Alaska Dept. of Fish and Game P.O. Box 115526

1255 W. 8th Street

Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska. As President of the Adgaagux Tribe of King Cove, I wish to extend Agdaagux's support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan by taking the following positions on the below-listed proposals:

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans, including our tribal members, have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of

action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community—King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon—are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities—including ours—die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Etta Kuzakin

President of the Agdaagux Tribe of King Cove

PC91

January 23, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries. I've been commercial fishing in the South Peninsula since I was six years old. I've been a captain for over 33 years. My kids have not missed a summer fishing with me since they were both six years old. My daughter is 28 and my son is 20. I've been on many boards over the years including the ADF&G advisory board in Sand Point.

Salmon fishing in the South Alaska Peninsula region is extremely important. Without salmon fishing, all that my family has worked for over centuries will be lost for absolutely no reason. My son has just begun running the boat for some fisheries; last summer I broke four ribs and he took over for salmon and saved our summer and our business. If our area loses any salmon time our family business will not survive and I will have to sell the business. We're barely making it by with all fisheries involved in the South Peninsula. The communities in the area will not survive without salmon. Period.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Robin Larsen
robinlarsen77@yahoo.com
(206) 484-6486

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 109: Oppose
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose

PC92

January 31, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Anchorage, Alaska and I participate in commercial fisheries. I am a resident of Anchorage, a student at UAA, and commercial deckhand on the F/V Jodi Marie, which salmon seines in Area M. While the quality of runs that the Kuskokwim has had in the past few years has been subpar, there is no scientific data or research that concludes the seiners of Area M are to blame. The true target of that should be the draggers who destroy the ocean bottom and catch millions of pounds of bycatch, but have enough money behind them that they can deflect the blame to our small fleet. To cut our June fishing days in half would cripple the fishery, but also the canneries and cities that call the South Alaska Peninsula home.

Salmon fishing in the South Alaska Peninsula region is very important. Although I'm from Petersburg and have only fished in the Aleutians for two summers, it is very clear that the communities of Sand Point, King Cove, and False Pass depend on salmon as their livelihood, just like Petersburg, and just like Bethel. As I was a deckhand during the 2022 season, I can say that all the boats came together and put aside their personal greedy interests to stand down when we were catching too many chums and work together to cooperate so that we wouldn't lose fishing time. I know that the Area M seiners will continue to work to not interrupt other districts' fish runs, but without scientific research to support a direct correlation between our fishery and the poor quality of theirs, I believe it would be a rash and wrong decision to approve proposal 148 or 149.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Chase Lockhart
chasetdlockhart@gmail.com
(907) 650-7202

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

My name is Cherilyn Lundgren and I live in Sand Point. I am employed with Aleutians East Borough School District in the Business Office. I have worked for the district for 17 plus years. I am a daughter of a retired Area M fisherman and a wife of an Area M fisherman and have children that also fish Area M.

I oppose the following proposals 106, 109, 119, 120, 126, 128, 133-143, & 148-150 against the South Alaska Peninsula Salmon Fisheries.

Aleutians East Borough is home to over 3000 year-round residents, many with a heritage in the Eastern Aleutians that goes back hundreds of years. Our population has always been dependent on fishing. We have no other industry that sustains our communities. Without fishing, we cannot maintain our cities and local jobs. This will have an immeasurable impact on our families and school. The School District employes local teachers and teacher aides, who know and care for our children. 6 of the 26 teachers employed have returned to teach in the district that they graduated from, and we have others that have moved into the community making the community their home.

Aleutians East Borough School District started with 6 schools and since I started working in 2005, 2 of the schools have been closed due to enrollment. Currently we have 1 of the 4 that is under the State enrollment requirement and Aleutians East Borough has been supporting the school to keep the doors open. Enrollment for Aleutians East Borough School Districts largest school has fallen under 100 students, and this has impacted our state funding. Fortunately, the Borough has helped with funding to keep these schools in operation when they have dropped under the student count required for State funding. Without the revenue from the fish taxes there is no guarantee the Borough will be able to help the schools stay open.

South Alaska Peninsula region (Area M) is being blamed from all sides. Before considering these proposals to further restrict our fisheries which would affect the communities of Aleutians East Borough. More research and studies need to be done. Decisions can not be made by accusations, they need to be made with facts and consideration of the environmental effects happening around us.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 109: Oppose
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose

PC94

February 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial and subsistence fisheries. I have lived and fished in Sand Point for 25 years, my wife works for the school district, and both my children attended & graduated from Sand Point School. Salmon fishing in the South Alaska Peninsula region is very important. The fact that our boat continues to remain almost all local hire gives me the most pride on a boat that fishes year-round. I have had family & friends who have used salmon settlements to pay for their education, and at times return to the area.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Taylor Lundgren
fvtemptationinc@gmail.com
(907) 383-5693

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC95

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial fisheries. Salmon fishing in the South Alaska Peninsula region is my way of life.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Jason Mack
kimnjason@yahoo.com
(907) 497-4211

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC96

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries, as well as through local business supporting fisheries. I am the King Cove Harbor Master. Salmon fishing in the South Alaska Peninsula region is the life of our community.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Charles Mack
harbor@kingcoveak.org
(907) 602-8770

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

February 6, 2023

PC97

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska and I participate in subsistence and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is important because it is a source of food and income.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Makrina Mack
kccadmin@artic.net (907) 497-3373

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC98

February 3, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. Specifically, I work as a deck hand. Salmon fishing in the South Alaska Peninsula region provides my yearly income and subsistence for the winter. I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Sincerely,

Earl Mack
lildubbs350@gmail.com
(907) 497-7038

PC99

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is very important as part of my yearly income and subsistence.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Sincerely,

Kjell Macks
kmack@aebsd.org
(907) 497-3330

Submitted by: Julian Manos

PC100

Community of Residence: King Cove/Anchorage, Alaska

Comment: Madam Chair & Members of the Board,

What is currently happening in the Arctic-Yukon-Kuskokwim (AYK) region is terrible. I was at the AYK meeting in January. I listened to people testify, listened to the current hardship that has beset the region, listened to the struggles of food scarcity, listened to the fear of loss of cultural identity, and I couldn't feel anything but sadness and frustration for what's going on there; as a fisherman, as family member, and as a fellow Alaskan resident. And as a mixed stock fishery that harvests salmon runs that are headed for various parts of the state we as a fleet in Area M have tried to do our part in mitigating our effect on stocks of decline. Both in compromises/cutbacks at every Board of Fish meeting since 2013, self-imposed stand downs that have come at direct costs to us, and in trying to support fisheries science and genetic sampling. We are currently in year one of another genetic study to try to asses our impact. The science seems to point to a combination of factors, however it also points to us as unlikely of being more than a minor or possibly negligible contributing factor. Cutting our time and area in the June fishery will lead to negligible benefits for other regions and drastic instability and hardship for our area.

Please, we must continue to search for ways to help find a solution of alleviating the hardships that are occurring in various parts of the state that rely on fish; through the statewide fisheries research that is actively being done and will continue to be done. And please, we must give things time to figure out if the changes that have already occurred over the last ten years to our management plan are actually doing anything to help declining stocks. But as I've said before, at some point we will be compromised out of a viable fishery if our management plan continues to be slashed. Boats will likely try to leave or be sold, our communities that rely on the fishery will suffer, and it will lead to destitution as we are compromised out of existence.

My name is Julian Manos, myself along with four others (including my father and brother) own and operate three combination seiners and a tender vessel in Area M. We also have a house and a shop in King Cove and like many in the South Peninsula spend most of our time living and working in the region. I started my fishing career first as a crew for my dad in Area M before going on to become captain of a seiner in the Alaska Peninsula in 2012 as a 22-year-old having spent the previous fall/winter/spring rebuilding a sunken boat I had purchased in Kodiak. I've since moved on from that boat, selling it to my skiff man who now seines in Area M. Another crew member has gone on to become one of our partners and runs one of our seiners out there as well. I mention this because it highlights the importance of young new entrants into this livelihood we are fortunate to be a part of. It seems harder and harder for our younger generations to overcome the barrier of entry into commercial fishing. Rising costs of everything from fuel to permits has made this an industry comprised predominantly of the old. For the posterity of our industry, of our state, and of ourselves we must continue to allow access for future generations. Part of successfulness in fishing and getting into fishing is stability, literally, but also stability in the regulatory process that keeps our states fisheries both sustainable and successful. Changes to management plans inherently create instability. At times they may be necessary, however, these changes should be backed by fisheries science and research, tools that are integral to our states long term sustainability.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 144: Support With Amendments
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC101

Submitted by: Tom Manos

Community of Residence: King Cove/Girdwood, Alaska

Comment: Madam Chair & Members of the Board

Every fish counts! It counts for those of us in Southwestern Alaska, In Coastal Western Alaska and in the AYK. For those of us that make a living off healthy, sustainable salmon runs science matters as witnessed by the health, in general, of the Alaskan Salmon fisheries. Please don't misinterpret me, every summer that I must sit on the beach instead of fish due to run concerns I have had to correct Alaska Fish and Gamed scientists, statisticians, and area management biologists. Perhaps I didn't always make impartial arguments to management and in retrospect I have experienced better fishing and healthier fisheries in my 50 years of participating in Alaskan commercial salmon fishing. I do not violate management regulations; I am always respectful of the people that work in management. I believe actions that dismiss sound management science, in the interest of political influence for one user group over another, will spell the end to a healthy and important salmon industry in Alaska. I am glad that I will not be around for the future that creates, and I am sad for my children, and my grandchildren, and those that follow. My education was in economics not science, I believe what is going on in the AYK region will be answered by scientists, not economists or politicians. These answers are important in making management decisions as well as environmental choices that favor salmon. Unfortunately, those efforts don't always occur on a time scale relevant to humans.

As I said my college degree was in economics not science. The economic argument is clear for my fishing business. We participate in Alaska fishing year round in addition to Salmon, we fish for Pacific Cod, Pollock, Tanner crab, and Sablefish. In 2022 half of our fishing income came from Salmon and half of that came in June. We voluntarily gave up 30% of our June fishing time to prevent it from being taken away from us by Board Action. The Economic math is clear we likely gave up 15 % of our yearly income. Our fishing business of which I am the oldest partner by more than 30 years is not rich but we are successful , taking away our June fishery will change that for the vibrant young group of Alaskans that are my partners. Our efforts quite likely had little impact on restoring the health of the AYK Chums because we are not the problem. Smarter people than me are making that science argument clear. When I put on my fisherman hat I can make a strong argument that the Asian chums we catch during that June fishing period does more for restoring the health of AYK Salmon than the relatively small number of AYK chums that we intercept. Do not interpret this to mean that each fish doesn't matter, the bottom line on my fish ticket is made up of every single fish I deliver.

In conclusion, taking away our access to healthy Salmon runs in June, is more than one nail in the coffin of our fishing business made up of more than 20 young Alaskans. I have spent a lifetime working to build this business with my sons and partners, and these actions could have a significant negative economic impact for us. I respectfully urge this Board to pay attention to the well documented, peer reviewed science that has and is responsible for keeping all Alaskan fishing resources healthy.

Respectfully,

Tom Manos

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC102

Submitted by: Andrew Manos

Community of Residence: Anchorage

Comment: Madam Chair members of the Board,

I have seen abundance and scarcity in my career. I have seen and caught part of the 70+million sockeyes returning to Bristol bay. I have also participated in the 2016 disaster relief for pink salmon returning to Alaskan waters. In area M we are the canaries in the coal mine so to speak. We are an intercept fishery and each year we get exposed to the abundance and scarcity of the Pacific Ocean. For all of the data, new and old, genetic and otherwise, I believe that there is no evidence for area M being the cause of the run failures that have occurred across the state.

The Alaska Peninsula salmon fishery has had a consistent management plan for the last 20 years and people have been harvesting salmon in this region for thousands of years. In the last twenty years the fisheries around us have fluctuated in run strength but our fishing opportunity has stayed consistent. Changing area m management plan will not fix issues in other areas. Area M is not the "smoking gun." There is a huge amount of change happening in our oceans, with climate shifts and increased hatchery releases. I don't think doing harm to the communities of the Alaskan Peninsula will do anything to address the root issue.

Last year over 70% of the June Chum harvest was hatchery fish, with the vast majority destined for Asia. We have no control over the output of Asian hatcheries, yet we are made to pay the price. We have experienced our own run failures with our pink stocks. For eight years we were not able to fish on our even year pink returns. While the Humpy may not be the most charismatic salmon it is essential for a purse seiners success. The even years appear to be rebuilding and I am hopeful of a consistent august run moving forward but it took time to get here. I believe time and research is ultimately what is going to be needed to heal the faltering stocks around us. Snappy political action may feel good but if it isn't doing good then all it does is harm.

Reducing opportunity in Area M will cause harm to the local communities and fishermen that rely on the summer salmon season. For new entrants into the fishery the possibility of drastic pollical action is yet another barrier to entry. If opportunity is taken away from the Alaska Peninsula there will be young fishermen that will either choose a different carrier or potentially loose an existing operation. Right now with cod stocks on a steady decline salmon is more important than ever for the fleet in Area M. For the last ten years we have been told to compromise, but as far as I can tell that means lose. We have given up area in Pavloff and time in the Shumagins. So far all I have seen is harm done by these compromises, the concerned stocks have not rebounded and our local fleet has lost traditional, weather protected areas to fish.

I feel for the communities affected by run failure and would like to see positive change for these communities and fisheries. To enact these changes requires an incredibly complicated collaboration between science and politics. Fish and game have good scientists working on this problem trying to grasp the entirety of the situation. I would urge the board to listen to your biologist and stive for positive change that does the least amount of harm.

My name is Andrew Manos I have fished in area M since 2008. I have participated in Salmon, Cod, Black Cod, Pollock and Crab fisheries in and around the South Peninsula my entire career. I have a residence in King Cove Ak where I spend around 5 months of the year, the remainder is spent in anchorage with my wife and two children.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

PC103

Submitted by: Lena McCarty

Community of Residence: Ruby Ak 99768

Comment: See attached I don't know the proposal number but I am in opposition of commercial fishing in Area M. They are taking our fish. We have no fish in our area. I've fished all my life, I'm 75 years old, and never seen disaster as having no fish to harvest. CONGRESS NEED TO STOP THE TRAWLERS FROM COMING INTO OUR STATE WATERS.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

PC104

January 20, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Petersburg, Alaska and I participate in commercial fisheries. As a lifelong salmon fisherman, watching opportunity disappear due to the perception that a fishery is having a negative impact without a firm science base is the most terrifying part of the current political climate. Fisheries will need to be adjusted due to changing conditions, however, this should be done in a manner that aligns with the facts and not the political angles of the actions. Salmon fishing is too important of an economic driver in the state to be slashed without good science-based reasons. Please allow Fish and Game to continue to manage based on science and not perception. Salmon fishing in the South Alaska Peninsula region is very important, as it is how I make my money and how I employ my crew. Without salmon I can't afford the boat and the maintenance or any of it. I don't have a pile of family quota or another fishery that generates the mainstay income for my family like salmon does. It's my livelihood and my living.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Charles McCullough
intrepidfisheries@gmail.com
(907) 518-1567

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC105

January 31, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Anchorage, Alaska and I participate in commercial fisheries. Commercial fishing is the reason I have a roof over my head and food**.** Salmon fishing in the South Alaska Peninsula region is our only real means of support.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Kathleen Mckinney
katieyvonnemckinney@gmail.com
(907) 942-5525

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC106

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. I am a third-generation fisherman of Area M. It comes down to livelihood. It is every family's wish to hand down their operations to the next generation. To strip OUR Area M salmon season away from us is pure hatred. It is so much easier to blame and pin communities against each other than to step up to the plate and own the situation. Do the homework. HEAR the facts. At the end of the day all we want to see our families and community flourish!

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Jose Medina
medina3@gci.net
(907) 830-1450

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC107

February 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska and I participate in commercial, subsistence, and personal use fisheries. I am Aleut shareholder. This is where my bloodline is from. I voice for the elders who need the fisheries to be open in order to live off their native foods that they haven't eaten their whole life, and for my children to have jobs that my father once did. Salmon fishing in the South Alaska Peninsula region feeds families. It's people careers. It's everything to most in this area.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Sincerely,

Alexsis Mistler
mistleralexsis@gmail.com
(907) 521-3442

PC108

January 21, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial and subsistence fisheries. I'm a third generation fisherman; I grew up fishing with my grandfather and father and now I'm fishing on my own. Salmon fishing in the South Alaska Peninsula region is very important, as it has provided an income for my family while also supporting the community businesses that are needed to support the fisheries.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Sincerely,

Benjamin Mobeck Jr
benjamin.mobeck@yahoo.com
(425) 210-0035

PC109

Submitted by: Timothy Murphy

Community of Residence: Anchorage, Alaska

Comment: To The State of Alaska Board of Fisheries;

My comments regarding Chignik related proposals as well as proposal 133 in the South Alaska Peninsula which I also submitted.

Proposal 106 I submitted. If you read the regulations you can easily see how much leeway adfg currently has regarding guestimation of escapement prior to the 1st

commercial harvest period in the CMA, and that the current language is written to produce harvest opportunity for intercept fisheries.

The proposal I submitted returns management practices to a long used escapement level prior to the first commercial harvest period. This allows for an actual deposit of

40,000 sockeye thru the weir, giving more early season time for subsistence opportunity, an increased window of time to guage early run strength, prior to the

first commercial fishing period in the CMA.

The previous language prior to the first commercial harvest period in the CMA also included "AS WELL AS A SIGNIFICANT BUILDUP OF SOCKEYE SALMON IN CHIGNIK LAGOON", there

does not appear to be the possibility of a significant buildup with so few sockeye able to make it back to the CMA so that language is not necessary.

Proposal 105

Oppose.

ADFG is attempting to create a new normal via creating a singular BEG, they already no longer take scale samples during the transition period between early and late runs to

ensure accuracy in managing escapement. Without genetics the biologists at ADFG can plug in whatever numbers they need to "manage" Chignik sockeye.

Without the use of genetic sampling, instead using "models" that do not reflect Chignik sockeye's current status of not making minimum escapement goals and being

declared a disaster is management in the opposite direction of returning the sockeye fishery back to it's traditional, historical norms. These stocks were rightfully

named a stock of management concern in 2022. ADFG is clearly unwilling to be in support of regulatory and mangerial change to return the Chignik salmon fishery to its

historical, traditional norms and creating an overall BEG will remove any responsibility to ensure adequate early run sockeye, if all you need is X amount of escapement

between June 1st and August 31st- (which was the very early date ADFG opted to pull Chignik Weir in 2022) there need be no accountability to letting the early run of

sockeye in Chignik be removed from any future salmon seasons.

This is an exerpt from a Chignik Salmon Season Annual summary:

Chignik Salmon Management Plan

The Chignik Salmon Management Plan (5 AAC 15.357) was originally adopted in 1999. The

goal of this plan is to allow traditional salmon fisheries in the CMA while achieving the established escapement goals for early-run (Black Lake) and late-run (Chignik Lake) sockeye salmon (Table 1), as well as local stocks of Chinook, pink, coho, and chum salmon. Purse seines and hand purse seines are the only legal commercial salmon fishing gear within the CMA. Legal seine gear ranges from 100 to 125 fathoms in length in the Chignik Bay District and from 100 to 225 fathoms in length in all other districts (5 AAC 15.332). To assist management efforts, the management plan is organized into districts or groups of districts: the Chignik Bay and Central Districts, the Eastern District, and the Western and Perryville Districts (Figure 2).

Proposal 107

OPPOSE

South Alaska Peninsula currently fishes on sockeye stocks with no regard to escapement is why the historical sockeye fishery in Chignik has had 2 disaster declarations and poor salmon fisheries since the 2018 salmon season. However, we do appreciate their support inthe needs for harvest opportunity. If you look at South Alaska Peninsula's Orzinski Lake escapement, they have not made its meager escapement goal in several recent years. That is a management issue, they wont even close the salmon fishery to ensure their systems acheive escapement goals, we cannot copy their management model in the CMA.

Proposal 108

Oppose.

There has been no June sockeye targeted harvest in the CMA since 2017, the Chignik Weir is the only guage necessary for determining the salmon run/management in the CMA.

Proposal 109

Support.

Proposal 110

Oppose.

The current regulations see that the CMA is closed for salmon fishing more than any other salmon seine fishery in the State of Alaska.

Proposal 111

Support.

Proposal 112

Oppose.

To put a sockeye harvest cap on what has been for over a century- a sockeye fishery, is foolish. Sincerity of the proposer is in question as an identical proposal was not submitted for the South Alaska Peninsula which harvests exponentially more of the stocks named in the proposal.

Proposal 113

Support

While I would like to see more pink and chum opportunity in the western and perryville districts, sockeye returning to the CMA must be ensured passage thru these districts.

Proposal 114

Support

Opening the eastern district after July 1 would be less impactful on CMA bound early run sockeye as well as give much needed harvest opportunity to a fishery

that has been closed more than any other salmon seine fishery in the state of Alaska since 2018.

Propsoal 115

Oppose

Look first at the pink and chum harvests in Area M and compare to harvest in CMA.

How much pink and chum has been harvested in the CMA since Jan 1, 2018 to date vs South Alaska Peninsula?

How many days of commercial harvest opportunity has there been in the Western and Perryville districts since Jan 1, 2018? How many days of commercial harvest in Area M?

no version of this proposal should be passed.

Please produce the documentation to verify Area M closed with Chignik fishing 7 days a week as stated by proposer.

Proposal 116

Same as Proposal 115.

Oppose

Proposal 133

Support.

Returns the South Alaska Peninsual Salmon Management Plan to a PRE 2004 management plan, with reduced impacts on Chignik and AYK salmon stocks. Please investigate how the management plan was altered in 2004 which led to a massive expansion of an intercept fishery.

Thank you,

Timothy Murphy

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 105: Oppose
Proposal 106: Support
Proposal 107: Oppose
Proposal 108: Oppose
Proposal 109: Support
Proposal 110: Oppose
Proposal 111: Support
Proposal 112: Oppose
Proposal 113: Support
Proposal 114: Support
Proposal 115: Oppose
Proposal 116: Oppose
Proposal 133: Support

PC110

1

Native Village of Belkofski
P.O. Box 57
King Cove, Alaska 99612
Phone: 907-497-3122/Fax: 907-497-3123
kcbtc@arctic.net

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska. As President, I wish to extend Belkofski's support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan by taking the following positions on the below-listed proposals:

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Belkofski is located on a point at the eastern end of the Alaska Peninsula, 12 miles southeast of King Cove. Before moving to what is now known as Belkofski, the Aleut people lived in Nikoliski. Russians originally settled Natives at Belkofski in 1823 to harvest the large concentration of sea otters inhabiting the area's reefs. At the height of this exploitation, Belkofski was one of the most affluent villages in the area. In the 1880s, there were three stores, and residents imported building materials and furniture from San Francisco. The Holy Resurrection Russian Orthodox Church was built in the mid 1800's. When the otter industry diminished at the turn of the century, so did the population of Belkofski. Remaining residents trapped. Cash employment in the Pribilofs, King Cove or Sand Point lured residents away from the village. When the last of the Belkofski residents moved to King Cove in the early 1980s, they took the church's bells and icons with them and built a new Orthodox church at King Cove. Belkofski is a summer fishing camp, used by King Cove residents and other area Unangan.

We have tribal members that participate in all facets of the fishery in the South Alaska Peninsula region (often referred to as "Area M"). Our tribal members rely on the Area M fishery to support their families, put food on their tables, and maintain their connection to these waters that our people have lived among since time immemorial.

Alaskans, including our tribal members, have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community—King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon—are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities—including ours—die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Lynn Farr
President

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC111

February 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial fisheries. I'm a commercial fishermen and city council member, and I employ five local fishermen on my boat. Salmon fishing in the South Alaska Peninsula region is very important. Not only does my business rely on salmon fishing, but my five crew local crew members and their families rely on salmon fishing. Plus, the city relies on the fish tax to operate.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Alvin Newman
ajn.63@hotmail.com
(360) 220-7272

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC112

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is very important as a source of food and income.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Kimberly Newman
kimnjason3@yahoo.com
(907) 421-7032

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC113

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. I run the AC Store here in King Cove—we sell goods to the boats as well as assist with other needs. Salmon fishing in the South Alaska Peninsula region is important because it provides jobs and food for a majority of the community. Without it I believe the city of King Cove would be no more. People would not be able to live or survive here without it.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Shannel Newman
alissaroxlynn@hotmail.com
(907) 331-7417

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC114

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is important because it is the biggest source of income and food.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Madeline Newman
annickaeileen@hotmail.com
(907) 497-7759

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC115

Submitted by: Connie Newton

Community of Residence: Cold Bay

Comment: I am writing in opposition of fisheries proposal 103.

This proposal as written changes the possession limits for both Coho and Sockeye salmon in all Cold Bay fresh water creeks and saltwater areas.

Regarding the salmon survey from the fall of 2022, by the Ak. Dept. of Fish and Game showed an above average count of Coho returns to Russell Creek, which is the most popular of the 4 local Silver Salmon Fisheries. As for the Sockeye Salmon, the surveys have shown a decline in one of our major sockeye systems-Mortensen, while there has been an increase in other systems that are now primarily used by both sport and most of our subsistence users

The unnecessary lowering of Coho Salmon limits will harm our local businesses, non-resident tourism and our area families.

Using science and management knowledge of our Coho and Sockeye fisheries here in Cold Bay, a compromise would be best suited for all who utilize these fisheries at this time. Please consider leaving the Coho Salmon limit as is and reduce the Sockeye Salmon limit to 3 daily in our area.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 103: Oppose

PC116

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

I live in King Cove, Alaska and I participate in commercial, subsistence, and personal use fisheries, as well as through local business supporting fisheries. Salmon fishing in the South Alaska Peninsula region is very important. My family has been a part of the salmon fisheries for generations—it has provided us a way of life.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Fanny Jo Newton
kccadmin@arctic.net
(907) 764-3289

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

NORTON SOUND ECONOMIC DEVELOPMENT CORPORATION

Serving the fisheries of the Bering Strait Region

Brevig Mission Diomede Elim Gambell Golovin Koyuk Nome Saint Michael Savoonga Shaktoolik Stebbins Teller Unalakleet Wales White Mountain

PC117

February 6, 2023

Ms. Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
333 Raspberry Road
Anchorage, AK 99518

Re: Comment on Proposal 140

Dear Chairwoman Carlson-Van Dort and Fellow Board Members,

Please accept this letter on behalf of Norton Sound Economic Development Corporation (NSEDC) in support of Proposal 140 which aims to reduce the impact of the Area M June chum salmon fishery's interception of salmon bound for western Alaska rivers.

NSEDC is the Community Development Quota (CDQ) organization representing 15-member communities and more than 9,200 people in the Norton Sound/Bering Strait region of Alaska. NSEDC provides economic development through education, employment, training and financial assistance to our member communities, with our biggest economic driver tied to our investments in regional commercial salmon, crab and halibut fisheries. NSEDC owns and operates three regionally based processing plants, four buying stations and a fleet of tender vessels that support more than 150 Norton Sound resident commercial fishers. NSEDC also operates salmon monitoring projects that assist the Alaska Department of Fish and Game with management of subsistence, sport, and commercial fisheries. Revenues earned by our local commercial fishers are often used in furtherance of subsistence fishing.

NSEDC shares the following concerns and comments as expressed by the Northern Norton Sound Fish and Game Advisory Committee.

Chum salmon bound for eastern Bering Sea drainages are in decline. Not only are the local commercial terminal fisheries limited, but the amount necessary for subsistence (ANS) is frequently not met. Even more importantly, escapement goals are frequently missed. The largest of these stocks of chum salmon are designated by genetic work as the "coastal western Alaskan chums", CWAK for short. A number of terminal fisheries and in-river fisheries have been established to sustainably manage these salmon. These sub-stocks all generally track together as to relative abundance, prospering or failing together.

The CWAK component of the June Area M chum salmon fishery has reportedly declined from 57% of the harvest to about 18%, a decline of two-thirds. Perhaps it may be that some of the other stocks have proportionally increased; that some of the CWAK decline has resulted from natural causes not studied; and that some of the Area M fishers' attempts to avoid chum harvest could have played a role. Nevertheless, this declining trend is concerning, even catastrophic. Both WASSIP and the most recent

2022 study found significant Area M harvests of CWAK chum salmon bound for Arctic/Yukon/Kuskokwim (AYK) and Bristol Bay (BB) area rivers.

State statute, the state constitution and regulation all speak to sustained-yield or optimal-yield management of fisheries. Escapement goals are to be set with the intent of ensuring adequate reproductive potential to not only sustain a reasonable human use, but to ensure genetic depth. The resultant genetic depth helps to prevent inbreeding or loss of adaptations specific to particular habitat conditions. These concepts have been discussed time and time again: at statehood; when fishing districts were first set in the 1960s; once again in the late 1990s when regulations were refined to require management plans that incorporate escapement goals; and more recently as the science of management evolves. Mixed-stock fisheries with both weak and strong stocks present, such as we now have in Area M, have been a concern throughout this evolution. The reason there are so few mixed-stock fisheries in the state is that this concern developed early in the sustained-yield approach to management.

The northern districts of AYK began to see declining chum salmon returns in the late 1980s. By the late 1980s and the 1990s, runs were at their lowest points since tracking began around the time of statehood. Northern Norton Sound returns were very poor, and escapements and subsistence harvests were so bad that the first and only Tier II fisheries in the state were put in place. This chum crisis in Nome brought on Customary & Traditional as well as ANS determinations for many western Alaska subsistence fisheries, establishing a management standard to truly prioritize subsistence use.

Generally, these findings pertained to salmon as a group rather than a specific stock. At that time, it was determined that when one salmon species failed, people would move to an alternate salmon species. In Northern Norton Sound substitutes for chum were often coho, sockeye and, rarely, Chinook. Pink salmon were not considered equal to chum but were a supplement in a shortage. Unfortunately, coho and sockeye stocks are currently in decline, joining Chinook and chum, and essentially leaving Norton Sound residents with no salmon species to turn to. At the AYK Board of Fisheries meeting this January, the Norton Sound Manager told members that the ANS for salmon had been attained only twice since the year 2000. This alarming statistic demands action as required by fishery regulation.

During the early salmon decline of the of the late 1980s and early 1990s, regulations were passed to slow the June Area M fishery by placing windows to allow salmon passage to more terminal fisheries and spawning grounds. The language in the current proposal 140 is a revival of that earlier language. Within a few years of the 1990s regulation changes, however, the June Area M fishery rules were liberalized even beyond the regulations of the previous decade. This coincided with the downward spiral of chum and Chinook fisheries to the north. With each successive board cycle, the Area M fishery has enjoyed some relaxation of the commercial fishery regulation. In the past 20 years, fishing time, fishing area, and gear depth in Area M have all increased significantly, while in the same time period the numbers of chum and Chinook returning to AYK did quite the opposite.

The wild chum stocks of AYK and Bristol Bay have trended down to the point of massive closures. This has not been true for the enhanced chum salmon stocks of the Gulf of Alaska and Asia, because they are much more stable, if not increasing. The Bering Sea wild salmon, of all species, are declining in size as well. This is likely a sign of food shortage or being out-competed by salmon from south of the Alaska Peninsula. The decline in number and size are classic signs of a weak stock. Overharvest of weak stocks results in extirpation. Delay in addressing the issue violates the “precautionary principles of sustainability” as noted several times through the state’s fishery regulations.

Certainly, the western Alaskan public is participating in conservation of these salmon stocks, often due to management actions. There are several examples of grassroot conservation efforts that demonstrate ownership in the resource. There have been voluntary reductions in fishing despite managers announcing openings. In Norton Sound, private funding exceeds ADF&G funded projects. Small, targeted enhancement projects have been developed. Much is at stake for western Alaska residents—local economies, food security and cultural stability, yet short-term sacrifices are currently being tolerated in hopes of a long-term solution. It is time for the other stakeholders in the chum fishery to ante-up.

Existing regulations that have already been passed by the Board of Fisheries speak of sustained-yield principles[1], avoidance of overharvest of mixed-stock fisheries[2], management plans based on attaining escapement goals[3], the priority of subsistence[4], and equitable sharing of resources by all users of fishery resources[5]. All of these regulations require action to encourage the return of chum to their natal western Alaska watersheds. The incidental take of western Alaska chum in the Area M June fishery is a known and controllable impediment to this regulated mandate. At what point do we see meaningful management changes to the June Area M fishery in order to reverse and contribute to the conservation of the wild salmon runs of the Bering Sea? Proposal 140 is a logical starting point.

Sincerely,

Janis Ivanoff
President & CEO

cc: Charlie Lean, Northern Norton Sound Advisory Committee Chair
Renae Ivanoff, Norton Sound Fisheries Research and Development Director

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 140: Support

[1] 5AAC 39.222. Policy for the management of sustainable salmon fisheries. (c)(1)(G)
[2] Sec.16.05.251. Regulations of the Board of Fisheries. (17)(h); 5AAC.39.220. Policy for the management of mixed stock fisheries. (a), (b), (c)
[3] 5AAC 39.222. Policy for the management of sustainable salmon fisheries. (c) (2) (A-H); (c) (3)(C); (c)(F); (c)((5)(A)
[4] 5AAC 99.010. Boards of Fish and Game subsistence procedures. (c)
[5] Sec. 16.05.251. Regulations of the Board of Fisheries. (17)(e)(1-7)

United States Department of the Interior

Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

PC118

IN REPLY REFER TO:
OSM.23006.JK

FEB 2 2023

Ms. Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The Alaska Board of Fisheries will consider 55 proposals at its Alaska Peninsula/Aleutian Island/Chignik Finfish meeting from February 20-25, 2023.

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed the proposals and believes that adoption of any of these proposals will not have significant impacts on Federal subsistence users or fisheries. During the meeting, OSM may wish to comment on other agenda items that may impact federally qualified subsistence users.

We appreciate the opportunity to comment on these important regulatory matters and look forward to continuing to work with the Alaska Board of Fisheries and the Alaska Department of Fish and Game.

Sincerely,

Sue Detwiler
Assistant Regional Director
Office of Subsistence Management

cc: Federal Subsistence Board
Interagency Staff Committee
Benjamin Mulligan, Alaska Department of Fish and Game
Art Nelson, Alaska Department of Fish and Game
Mark Burch, Alaska Department of Fish and Game
Administrative Record

PC119

Submitted by: Orutsararmiut Native Council

Community of Residence: Bethel, Alaska

Comment: The Orutsararmiut Traditional Native Council (ONC) of Bethel, Alaska and its Natural Resources Subsistence Committee have passed anonymously in support of the Alaska Peninsula/ Aleutian Island/Chignik Finfish Proposals of Area M: Proposals of Concern: 133, 134, 136, 137, 138, 139, 140, 141, 143, 148 and 149.

ONC also passed a resolution anonymously in support of the Alaska Peninsula/Aleutian Island/Chignik Finfish Proposal 140 as outlined, "PROPOSAL 140

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time" proposed by the Fairbanks Advisory Committee Fisheries Sub-Committee.

ONC's mission is charged with protecting and promoting the health, safety, general welfare, cultural preservation of Tribal members, and pursuant to the Tribe's inherent sovereignty, constitution and bylaws. ONC's Natural Resources Department provides services as a central clearinghouse on resource questions within the Bethel area, active as an informational center and investigates/advocates Tribal interests in specific cases ranging from State, Federal and Village corporations. We work closely with the Alaska Department of Fish and Game, Kuskokwim River Inter-Tribal Fish Commission and U.S. Fish & Wildlife Service on all Kuskokwim fish and game resource issues. Tribal members, non-tribal members, citizens of Bethel, and many more people living within the service area of Orutsararmiut Native Council experience poverty and most of many depend on the Kuskokwim River and region's natural resources of fish, and wildlife to sustain their cultural subsistence economy. Our tribe along with other tribal communities dwelling within the Arctic/Yukon/Kuskokwim (AYK) region have witnessed iniquity through harsher regulated conservation methods, enforced closures in both Yukon and the Kuskokwim Rivers preventing our peoples from participating in cultural seasonal fishing harvest opportunity periods while the State of Alaska and the Board of Fish promotes the unlimited sanctioning of the commercial fishery industries harvest caps. ONC trusts in supporting the Alaska Peninsula/Aleutian Island/Chignik Finfish Proposal 140 as outlined: "Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time", will allow passage of salmon stocks meant for the Arctic/Yukon/Kuskokwim Regions ensuring cultural subsistence harvest opportunities and supporting the migration of salmon stocks to the spawning tributaries as they are meant to.

Our Alaskan Native Peoples who strongly live a subsistence cultural lifestyle only take what is needed to feed their families, we shouldn't have to be placed under regulated conservation methods that restrict us from harvesting salmon in rightful due seasons while the commercial industry and all those connected in holding hands together profit. Our cultural values in living a subsistence lifestyle is worth defending especially when we are faced with opposing the Donlin Gold Mine Project. Be the help that we need you to be.

ONC has also passed anonymously in opposition of AK Peninsula/Aleutian Island/Chignik Finfish Proposals of Area M: 142, 145, 146, and 147.

ONC has not taken any action on proposals 135 and 144

Thank you, this concludes my comment.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 133: Support
Proposal 134: Support
Proposal 135: Oppose
Proposal 136: Support
Proposal 137: Support
Proposal 138: Support
Proposal 139: Support
Proposal 140: Support
Proposal 141: Support
Proposal 142: Oppose
Proposal 143: Support
Proposal 145: Oppose
Proposal 146: Oppose
Proposal 147: Oppose
Proposal 148: Support
Proposal 149: Support

PSPA
PACIFIC SEAFOOD
PROCESSORS ASSOCIATION

PC120

February 1, 2023

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair
Via email: dfg.bof.comments@alaska.gov

Chair Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (Board) Alaska Peninsula/Aleutian Island/Chignik Finfish meeting scheduled for February 20 - 25. The Pacific Seafood Processors Association (PSPA) is a nonprofit seafood trade association representing seafood processing businesses across coastal Alaska, including those that serve fleets in the Chignik, Bristol Bay, and Area M salmon fisheries. **PSPA is opposed to proposals before the Board which seek to significantly alter the regulations for the South Alaska Peninsula fisheries at this time.**

Many of these proposals request further reductions to the fishing periods in the Shumagin Islands and Dolgoi Islands Area and will thus have a significant negative impact on Area M fishermen, processors, and the communities dependent on these fisheries, especially Sand Point, King Cove, and False Pass. The ability to have a local economy in these communities and to continue operating processing plants, which require large volume, is directly related to access to the salmon fisheries. These harvests sustain families and provide the vast majority of the operating revenue for these communities through local, borough, and state shared fish taxes. Without salmon, the multiple processors and the fishing economy they support would not be possible in these communities. Aleutians East Borough reports that 32% of the fish taxes they received in 2022 were from salmon, 80% of the private sector jobs in the borough communities are seafood-related, and the majority of Area M salmon permits are owned and used by Alaska residents.[1]

The Area M fleet and processors worked hard in 2022 to significantly reduce chum harvest using voluntary time and area closures and stand-downs implemented on the water in response to chum conditions as they changed throughout the season. This reduced chum harvest in 2022 by 50% compared to 2021. There is a strong commitment to continue this approach in 2023 and strengthen it to create greater responsiveness and accountability. This means moving quickly to avoid chum when chum rates increase, faster and more accurate information-sharing across the fleet (to avoid chum) through a formal database (portal) in which the entire fleet would participate, and accountability for each individual vessel. This type of adaptive management requires vessels to cooperate and share catch data and location, processors to provide daily reports in near real-time, and vessels to move or stop fishing when directed to do so.

Chum and sockeye abundance and distribution change constantly over time, and this type of approach is the only way to constantly monitor and reduce chum harvest in response to those changing conditions.

[1] AEB residents averaged 72% of the Area M purse seine salmon permits fished between 1980-2020. Source: Northern Economics, Inc. The Importance of Fisheries to the Aleutians East Borough. Prepared for Aleutians East Borough, March 2022.

Allowing flexibility in both fishing areas and times allows the fleet to move off chum hot spots to areas with lower chum harvests quickly and the fleet's proposal ensures compliance and accountability. Given the recent genetic report[2] that indicates that 17% of the June harvest (seine and drift) were of coastal western Alaska origin, it is important to support an approach that can both optimize harvest of sockeye for the benefit of Alaska and local communities while minimizing harm to other fisheries. A flat cap on chum harvest or severely limiting the areas/times the fleet can fish does neither of those things and does not actually serve the board's intent to lower chum harvest. Those are coarse responses that don't allow the fishery to adapt to conditions that change year by year, let alone day by day. This is why the fleet and processors have responded to the Board's strong direction to change management and reduce June chum harvest, because it was clear that 2021 chum harvest was unacceptable, especially during times of severe declines in AYK runs.

The ADFG 2022 chum salmon genetic study results, published in January 2023, show that the majority of chum in the June harvest were of Asian origin (58%), and the aggregate coastal western Alaska grouping (17%) is comprised of chum destined for a combined grouping of rivers across 800 miles of coastline including Bristol Bay, Kuskokwim, Yukon, Norton Sound, and other river systems. ADFG is clear that stock composition estimates alone do not indicate what proportion of the total run of the coastal Western Alaska grouping or Upper Yukon chum salmon was harvested in the Area M fisheries, but the genetic results are still informative. Many of these fish were likely destined for Bristol Bay, where the Nushagak's 2022 harvest and escapement was 473,800 chum. Harvest rates as well as additional years of sampling (the genetic report noted future sampling planned) would help provide additional context for the Board, similar to the previous WASSIP studies.

The Area M seine fishermen, processors, and Aleutians East Borough have invested significant time and funding into developing an on-the-water program that has proven to reduce chum harvest while targeting sockeye salmon. The fleet is prepared to implement a similar but improved agreement in 2023, which would allow them to change or cease fishing in near real-time based on information coming through the portal developed by the Borough and the Area M Seiners Association. The intent is to continue to reduce chum harvest while maintaining sockeye fisheries that are critically important to these communities.

Thank you for the opportunity to comment.

Sincerely,

Nicole S. Kimball

Nicole S. Kimball
PSPA Anchorage

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose	**Proposal 128:** Oppose	**Proposal 137:** Oppose	**Proposal 142:** Oppose
Proposal 109: Oppose	**Proposal 133:** Oppose	**Proposal 138:** Oppose	**Proposal 143:** Oppose
Proposal 119: Oppose	**Proposal 134:** Oppose	**Proposal 139:** Oppose	**Proposal 148:** Oppose
Proposal 120: Oppose	**Proposal 135:** Oppose	**Proposal 140:** Oppose	**Proposal 149:** Oppose
Proposal 126: Oppose	**Proposal 136:** Oppose	**Proposal 141:** Oppose	**Proposal 150:** Oppose

[2] http://www.adfg.alaska.gov/FedAidPDFs/SP23-07.pdf

PC121

Submitted by: Pauloff Harbor Tribe

Community of Residence: Sand Point

Comment: The Pauloff Harbor Tribe of Sanak (Pauloff Harbor Village) is a federally recognized tribe and our ancestors lived on Sanak Island for thousands of years. Currently, no one lives on Sanak Island and the location of the tribal office is in Sand Point, Alaska where most of our tribal members now live. Even though tribe members no longer live on Sanak Island our ancestral home, we continue to subsistence, hunt, and make a living from the waters around the island as our ancestors have.

The Pauloff Harbor Tribe is providing comment to the Board of Fish for the regularly scheduled meeting, February 20-25, 2023, Alaska Peninsula/Aleutian Islands/Chignik Finfish.

The Pauloff Harbor Tribe is very concerned about several proposals submitted to the Board of Fish seeking to limit an already limited salmon fishery in AREA M. These proposals if approved by the Board of Fish will harm our tribal members and our communities in AREA M without improving the fishery for those who seek to reduce our fishery.

Regarding Chignik runs, Chignik has seen an improvement in those stocks and there is no need to further restrict AREA M because of Chignik stock.

Past restrictions had serious effects on our membership and communities. The tribe has seen the outmigration of our members looking for better opportunities to make a living. Our communities were once thriving and growing but now they are barely making it. With the consistent threat to our livelihood, our people are leaving because they don't see a future.

Thank you for your consideration please maintain the status quo for the current ADF&G Alaska Peninsula Management Plan.

Sincerely,

George P. Gundersen

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

PC122

January 8, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is my livelihood.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Dean Pedersen
north5520@gmail.com
(907) 355-1054

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

February 4, 2023

PC123

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is essential to myself and my family. My community is built around fishing and is how families, including my own, make a living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Grace Pedersen
pedersengrace@gmail.com
(907) 715-1445

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC124

February 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is very important. My husband is a lifelong fisherman and an Area M permit holder.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Traci Pedersen
aktraci@gmail.com
(907) 355-1056

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC125

January 10, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Anchorage, Alaska and I participate in subsistence and personal use fisheries. I used to be a commercial fisherman and permit holder out of Sand Point for many years. I now work for Eastern Aleutian Tribes since 2003. Salmon fishing in the South Alaska Peninsula region is very important to me and my husband.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by supporting the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Lori Pedersen
pedersenlms@gmail.com
(907) 301-6594

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 107: Support	**Proposal 112:** Support	**Proposal 130:** Support	**Proposal 145:** Support
Proposal 108: Support	**Proposal 115:** Support	**Proposal 131:** Support	**Proposal 146:** Support
Proposal 110: Support	**Proposal 116:** Support	**Proposal 144:** Support	**Proposal 152:** Support

PC126

Submitted by: Dale Pedersen

Community of Residence: Anchorage,Alaska

Comment: See attached

Please use science when you make decisions that affect our livelihoods. I know there are a lot of numbers getting thrown around about all the chums getting caught in area M that aren't true. There has been, since 1982,about 4 billion chum salmon fry getting released into North Pacific Ocean.

Personally I really believe there is something going on with AYK River system that is affecting returning salmon stocks.

I also believe that whatever you do to us is not going to help their problems in any way shape or form.

Thank you,

Dale Pedersen

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 105: Support
Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC126

January 5, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in Sand Point, Alaska and I participate in commercial and subsistence fisheries. I am Alaskan born; commercial fishing is all I have ever done. I graduated high school in 1980 and never went to a day of college. I attended AFN in Anchorage this year only because of their resolutions to shut Area M down. To see all the communities bickering against us was very disheartening, to say the least—especially when the science says it's not our fault. Why don't they try hatcheries where the runs aren't producing? Wouldn't that make more sense than closing Area M? Salmon fishing in the South Alaska Peninsula region is very important especially due to commercial fishing salmon now more than ever with the ever-shrinking cod quotas—is very important to everyone who tries to maintain a household out here.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Dale Pedersen
spotsboy@gci.net
(907) 229-6919

BOF Alaska Peninsula Comments
PO Box 232 Petersburg, AK 99833

Petersburg Vessel Owner's Association
(907) 772-9323
email: pvoa@gci.net

PC127

February 1, 2023

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

Re: Alaska Peninsula, Aleutian Islands, Chignik Finfish Proposal Comments

Dear Madam Chair Carlson-Van Dort and Board of Fisheries Members,

Petersburg Vessel Owner's Association (PVOA) is composed of 85 members participating in a wide variety of species and gear type fisheries in state and federally managed waters and businesses supportive to the industry. PVOA members fish throughout Alaska from Southeast to the Bering Sea. Targeted species include salmon, herring, halibut, sablefish, crab, shrimp, sea cucumbers, and geoducks.

We are writing today in opposition to proposals 148 and 149 that would substantially reduce fishing periods in Area M. Our members are sympathetic to the drastic declines in chinook and chum salmon returns to the Yukon and Kuskokwim Rivers in recent years and hardships faced by subsistence communities. However, this decline is not caused by the Area M mixed stock salmon fisheries.

Collaborative research between NOAA Fisheries and the ADF&G identified several factors in Chinook and chum salmon stock declines including:

- warm water temperatures in recent years,
- changes in what salmon and their prey are eating,
- changes in fish metabolism and growth rates; in warm conditions fish typically grow faster and need more food to survive winter,
- changes in maturity; when fish mature at an earlier age they produce fewer eggs[1].

The current management plans for Area M have continually been reviewed by the Board of Fisheries with consideration for the eight principles outlined in the Board's Policy for Mixed Stock Salmon Fisheries.

These principles speak to wild stock conservation and subsistence priority. In considering proposals 148 and 149, the following principles are pertinent.

[1](2022, August 23). *What's Behind Chinook and Chum Salmon Declines in Alaska?* NOAA Fisheries. Retrieved January 16, 2023, from https://www.fisheries.noaa.gov/feature-story/whats-behind-chinook-and-chum-salmon-declines-alaska#:~:text=Climate%20Change%20seen%20as%20the,the%20Yukon%20and%20Kuskokwim%20rivers.&text=NOAA%20Fisheries

-Principle 2, '… Most mixed stock fisheries are long standing and have been scrutinized many times by past boards. Consequently, existing regulatory management plans are understood to incorporate conservation burden and allocation…'

-Principle 3, 'The policy should recognize that salmon resources are generally fully utilized and that stability is an important aspect of the fisheries.'

CFEC data shows many of the S01M, S03M, and S04M permits that could lose access to half of their fishing time during peak months under these proposals are owned by Alaska residents of small, coastal, fishery dependent towns. In most recent 2021 CFEC Census Tables, 3 permits were owned by residents of False Pass[2], 48 of King Cove[3], 2 of Cold Bay[4], 17 of Nelson Lagoon[5], 88 of Sand Point[6], and 5 of Petersburg[7]. Further, in 2022, Alaska residents own 269 of these permits[8]. Consistency in access to these fisheries are important for the ability of these permit holders and their crews to provide for their families.

-Principle 4, 'new or expanding fisheries on mixed stocks may potentially change management schemes for conservation or may change existing allocations.'

The Area M salmon fisheries are neither new nor expanding. They were established prior to the Limited Entry Act and among the original fisheries to be permitted by CFEC in 1975[9].

Further the Board's Mixed Stock Policy states, 'Intrinsic within the management of mixed stocks is the question of how conservation and allocation of weaker stocks which may be present shall be achieved. In each regulatory decision, the board must weigh how harvests of healthy stocks will be managed in order to protect less robust components of fisheries.'

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[2]CFEC, Fishery Statistics, 2021 Census Table Menu, False Pass, https://www.cfec.state.ak.us/gpbycen/2021/013004.htm
[3]CFEC, Fishery Statistics, 2021 Census Table Menu, King Cove, https://www.cfec.state.ak.us/gpbycen/2021/013006.htm
[4]CFEC, Fishery Statistics, 2021 Census Table Menu, Cold Bay, https://www.cfec.state.ak.us/gpbycen/2021/013003.htm
[5]CFEC, Fishery Statistics, 2021 Census Table Menu, Nelson Lagoon, https://www.cfec.state.ak.us/gpbycen/2021/013007.htm
[6]CFEC, Fishery Statistics, 2021 Census Table Menu, Sand Point, https://www.cfec.state.ak.us/gpbycen/2021/013011.htm
[7]CFEC, Fishery Statistics, 2021 Census Table Menu, Petersburg, https://www.cfec.state.ak.us/gpbycen/2021/195424.htm
[8]CFEC, 2022 Permits Status, All Fisheries, https://www.cfec.state.ak.us/pstatus/14052022.htm
[9]CFEC, Basic Information Table, Fishery Group: Salmon, S01M, S03M, S04M, https://www.cfec.state.ak.us/bit/X_S01M.htm, https://www.cfec.state.ak.us/bit/X_S03M.htm, https://www.cfec.state.ak.us/bit/X_S04M.htm

The potential 50% reduction in fishing time in the *South Unimak and Shumagin Islands June Salmon Management Plan*, *Post-June Salmon Management Plan for the South Alaska Peninsula*, and *Southern District Mainland Salmon Management Plan* under proposals 148 and 149 would fundamentally reduce the sustainable harvest of healthy stocks traditionally harvested in Area M. These include pink salmon bound for the Alaska Peninsula, sockeye salmon predominantly of Bristol Bay and Alaska Peninsula origin, and chum salmon bound for a number of areas including; Japan, Russia, Artic-Yukon-Kuskokwim, Bristol Bay, the Alaska Peninsula, and southcentral Alaska.

We advise caution in any amendments to Area M fishery management plans to prevent reductions in harvest of healthy salmon stocks to the extent optimum yield will likely not be attainable.

Area M fishermen are cognizant of the poor salmon returns to the Yukon and Kuskokwim Rivers and took voluntary actions in 2022 to the extent their chum harvest was reduced by 50% year-over-year from 2021. These measures, in cooperation with ADF&G, included test fisheries and voluntary stand downs. The fleet is actively coordinating similar efforts for 2023.

Thank you for your time and dedication in considering public comments. We are happy to answer any question in by phone or by email at: pvoa@gci.net.

Respectfully,

Megan O'Neil

Megan O'Neil
Executive Director

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 148: Oppose **Proposal 149:** Oppose

PC128

Darren Platt

PO Box 1413

Kodiak, AK 99615

darrenplatt@yahoo.com

January 28, 2023

Alaska Board of Fisheries

Chairman Marit Carlson-Van Dort

I am writing in **opposition to proposals 111, 113, 114, 117 and 118**. The Chignik Management Area (CMA) is the only region of the Western Gulf of Alaska prosecuting an unchecked mixed stock fishery on non-local stocks. The Alaska Department of Fish and Game now recognizes this shortcoming in the past management approach to Chignik, and it is time for The Board to finally address this longstanding omission in their development of a management plan for the CMA. The WASSIP study clearly demonstrated high incidence of non-local sockeye and chum stocks harvested in the CMA, with particularly high components of non-local stocks in the Western and Perryville districts. Sockeye harvests in the Chignik area have been incorrectly treated as stocks of local origin, thereby allowing Chignik fishermen to prosecute an expanding intercept fishery on Kodiak, Cook Inlet and Bristol Bay stocks. Meanwhile, The Board has consistently imposed increasingly onerous restrictions on the purported harvest of non-local stocks in the Kodiak area, without providing any protections for Kodiak stocks harvested in the Chignik area. The Board should impose harvest caps of sockeye occurring in the Western, Eastern, and Perryville districts similar to those imposed on Kodiak fishermen in the Shelikof straight. Such actions would demonstrate consistency and parity in The Board's treatment of the Gulf of Alaska's salmon fisheries.

Darren Platt

PC128

Darren Platt

PO Box 1413

Kodiak, AK 99615

darrenplatt@yahoo.com

January 28, 2023

Alaska Board of Fisheries

Chairman Marit Carlson-Van Dort

I am writing in **support of proposal 108,** if and only if **proposal 112 is adopted** *and* management provisions requiring concurrent openings in the Western and Perryville district are eliminated so that the test fishery is only prosecuted only in the Eastern District. Chignik fishermen have historically harvested local and non-local stocks in June, as demonstrated in the WASSIP study. This proposal would provide them the opportunity to sustain that harvest. However, eastern district sockeye harvests should remain within the thresholds imposed in proposal 112 in order to prevent excessive pressure on Kodiak and Cook Inlet stocks. This proposal would provide uniformity of management in the western gulf where short test fisheries provide fishing opportunity as well as run strength analysis without imposing excessive pressure on potentially weak stocks. The proposal should not require openings, but simply allow them during timespans that department staff determine would not place excessive pressure on Chignik stocks if the local run appears weak.

Darren Platt

PC128

Darren Platt

PO Box 1413

Kodiak, AK 99615

darrenplatt@yahoo.com

January 28, 2023

Alaska Board of Fisheries

Chairman Marit Carlson-Van Dort

I am writing in **support of proposal 112,** however, the sockeye harvest limits included in the proposal should be extended through September to ensure sufficient protections for late-run sockeye bound for the Kodiak area. Similar limits should also be imposed on the Western and Perryville districts where recently intensified harvest of non-local stocks should be limited to traditional levels. Chignik has always operated with an essentially unlimited allocation of non-local stocks through the application of a management plan that erroneously assigns all sockeye harvest as local origin stocks. It is time for CMA fishermen to bear the burden of conservation of non-local mixed stocks.

Darren Platt

PC128

Darren Platt

PO Box 1413

Kodiak, AK 99615

darrenplatt@yahoo.com

January 28, 2023

Alaska Board of Fisheries

Chairman Marit Carlson-Van Dort

I am writing **in support of proposal 119** which would allow a salmon troll fishery to be prosecuted in the CMA. Troll fisheries provide entry opportunities and low cost resource access to new fishermen and typically result in a high value/low volume impact. Before a new fishery is initiated, a working group should be formed to asses the potential impacts on non-local stocks and to determine whether reasonable harvest caps on silver, chinook, and chum salmon would produce a fishery that is manageable, sustainable and economically viable.

Darren Platt

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 108: Support With Amendments
Proposal 111: Oppose
Proposal 112: Support With Amendments
Proposal 113: Oppose
Proposal 114: Oppose
Proposal 117: Oppose
Proposal 118: Oppose
Proposal 119: Support With Amendments

PC129

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in Unalaska, Alaska and I participate in subsistence fisheries. Subsistence salmon fishing is important to our community.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Christopher Price
chris@qawalangin.com
(907) 359-3515

PC130

Alaska Board of Fisheries

P.O. Box 115526

Juneau, Alaska, 99811-5526

Submitted via online form

RE: Opposition to Proposals 133, 134, 135, 136, 137, 138, 139, 140, 143, 148, 149 and 150

Dear Fisheries Board Members,

I am responding to the Alaska Board of Fisheries Request as the Qawalangin Tribe of Unalaska's (QTU) Fisheries Manager for comments in preparation for the regularly scheduled Alaska Peninsula/Aleutian Islands/Chignik Finfish February 2023 Meeting. QTU stands in solidarity with our sister Unangaŷ tribes who's fishing opportunities would be most affected by the multiple proposals that seek to limit the mixed-stock salmon fisheries in Area M of the south Alaska Peninsula to Unimak Pass, including the Shumagin Islands (south Alaska Peninsula salmon fisheries). I am in strong agreement with the Aleutian Pribilof Islands Association's (APIA) statements on these proposals regarding Area M fisheries management. APIA is a tribal consortium that represents and serves QTU and the other 12 Unangaŷ tribes of the Aleutian region.

These proposals threaten the tribes' and communities' sustainability and Unangaŷ culture by curtailing access to local fisheries. Despite the stated goals of preserving the salmon fisheries for all the communities across Alaska that rely on those runs, the outcome of these proposals will not be accomplished by the proposed means.

The following proposals fall into three categories: concerns about Chignik sockeye, concerns about western Alaska chum, and concerns about Chinook, and so have been separated to better discuss the conservation activities of each species and area. The rational for the following four Chignik sockeye proposals have a shared faulty assumption; current management efforts appear to be improving escapement and local fishing opportunities and these successful actions should be allowed to continue at this time.

We oppose Proposal 133 because while this proposal intends to improve Chignik sockeye harvest opportunities by reducing areas fished in Area M, both Chignik sockeye escapement and harvest opportunities have improved over the last two years while recovering from environmental change, making these area closures unnecessary at this time.

We oppose Proposal 134 that asks to revert to the 2001-2003 Management Plan, but adds Chignik sockeye and Coho salmon, because Chignik sockeye escapement has been improving under the current plan and without an ADF&G-identified Coho issue in this management area, it does not warrant

reverting to an outdated management plan. The call for better genetic studies is appropriate to improve our scientific understanding and management of Alaska's changing fisheries.

We oppose Proposal 135 that calls to manage to an 82% Unimak to 18% Shumagin Islands sockeye ratio, because this proposal may not be based on actual current proportions, nor is it necessary while the current management plan provides increasing escapement and harvesting opportunities in the Chignik area.

We oppose Proposal 150 because this proposal would increase the south Alaska Peninsula fishing areas that falls under the SEDM, setting a precedent to increase the area under more restrictive management, despite increasing escapement and harvest opportunities in the Chignik fisheries that demonstrates the effectiveness of the current management plan. Allow the current management plan to continue to provide greater escapement and fishing opportunities.

The following six proposals driven by concerns for chum salmon in western Alaska are well intended and motivated by the significant recent losses suffered by these stocks. These proposals are unlikely to accomplish their stated goals of improving chum returns to western Alaska, for several important reasons.

1) Only 17% of south Alaska Peninsula harvested chum are bound for western Alaska, including to Bristol Bay, where significantly more chum salmon are harvested.
2) A chum cap will only increase the race for fish and fishing pressure on the early runs, ensures harvest up to the cap, and disadvantage local fishermen who benefit from longer, more conservatively-paced seasons.
3) Decreasing fishing areas will increase fishing concentration on each remaining area and increase fishing pressure on each fish pulse, growing the likelihood of harvesting a run returning to an environmentally-vulnerable location.
4) Decreasing fishing time will increase fishing pressure during each opener and reduce the ability of fishermen to make test sets, plan for and execute voluntary stand-downs, and result in greater indiscriminate harvests.
5) The historic management plans requested were not developed for today's environmental conditions and would lose the voluntary gains made in the reduction of chum salmon.
6) Overly prescriptive fishing regulations deny lifelong fishermen the ability to apply their knowledge to reduce incidental catch by fishing the long game, in each season and over their lifetimes, as many local fishermen have been doing.

We oppose Proposal 136 because a chum cap would increase short-term competition, where fishermen will be forced to derby fish up to the cap to get their share of the catch in any given season. This strategy rewards frenzied fishing, while disadvantaging the local fisherman who needs as long and as productive of a fishing season as possible, while also ensuring that at least 280,000 chums will be harvested every year. The current voluntary fishing measures may be able to harvest less than 280,000 fish in June, especially as more of the fleet implements avoidance measures.

We oppose Proposal 137 because this proposal could result in unsustainable harvest levels for processors, unprofitable seasons for fishing families, and unrestrained harvests when there were openers, bringing into question if the stated goal of reduced chum harvest would be met. The proposal notes the unusually high harvest of 1,168,601 chum in the 2021 south Unimak and Shumagin Islands June Salmon fishery. The introduction of a new processing plant, increasing the number of active

permits, and bringing in new to the area fishermen, created a rare situation that will not be repeated in the near term. The 2022 chum proportion being the lowest in 20 years shows how effective voluntary fleet measures can be, but these effective reductions would be very difficult to accomplished in a 100-hour fishery.

Proposal 138 is opposed because the proposal does not include appropriate justification to require such an extreme financial impact. No specific under-reporting, illegal fishing or scientific information need was identified that could improve conservation or enforcement. It would also be unworkable in both observer costs per fishing business, and in berth space for an additional non-family member on tight working vessels.

We oppose Proposal 139 because this proposal would revert to reduced areas and times, concentrating effort and the race for fish. By diminishing the fleet's ability to take the voluntary actions that brought chum ratios to the lowest they have been in 20 years and less than half the number of fish as the year prior, this action would likely result in increased chum harvest.

These following two South Alaska Peninsula Salmon Management proposals were so concerning to the Aleutian Pribilof Islands Association Fisheries Committee, that the Board of Directors passed a resolution asking the Alaska Board of Fisheries to oppose Proposal 148 and Proposal 149. The stated goals are to reduce chum interception; however, the methods proposed solely focus on reducing the south Alaska Peninsula salmon fisheries.

Proposal 148 specifically intends to halve the fishing time in 3 Area M management plans if Y-K preseason forecasts fall below lower escapement goals, reduce fishing areas, and add gear restrictions. Each of these individual management strategies has the potential to increase chum catch as smaller areas are fished harder in shorter timeframes, in order to preserve the area's fishing businesses. Despite claiming to be non-prescriptive, these combined actions would force fishermen to fish faster, in smaller areas, with less time to make test sets, coordinate across the fleet, and voluntarily move off the chum to other areas and give time for runs to pass.

We also oppose Proposal 149 because, with the exception of the important request to increase genetic studies, each requested management action has the potential to increase chum harvest over current voluntary measures, and combined, would certainly force the choice between costly voluntary conservation measures and scratching out a meager salmon season.

These following two Chinook and other salmon proposals do not demonstrate the relationship between the south Alaska Peninsula salmon fisheries and the proposed conservation intent for Chinook or immature salmon. These issues deserve consideration and actions that can be expected to have a conservation impact on the stated issue, by demonstrating some correlation. We oppose Proposal 140 because reduced fishing areas and times will result in increased and concentrated pressure on fewer stocks, increasing the impacts on each run of fish.

We oppose Proposal 143 because it does not establish the need for increased immature salmon protections beyond the current protective actions or the relationship with the setnet fishery that would warrant the close of the set gillnet fishery, if 100 immature salmon are caught in a seine net test fishery.

Due to the lack of scientific support that these actions would improve chum returns in Western Alaska, Chignik sockeye returns, or Chinook and immature salmon returns, and because of the undue economic impacts that these proposals will impose on the fishermen and communities of the south Alaska Peninsula, these proposals should not be supported. The current efforts of south Alaska Peninsula salmon fishermen, including successful voluntary measures to actively reduce chum salmon catch and the Chignik sockeye escapement improvements under the current SEDM Management Plan, deserve your support to be allowed to continue.

These twelve proposals focus on limiting fishing time and opportunity, which will impact this season and future seasons, drive down permit value, and eventually force regional-resident fishermen out of the business, which always results in an outmigration of Unangaŷ families from our communities. Half of the Area M permits are owned by Unangaŷ families, so these issues are Tribal issues in our region too, and these proposals are Tribal threats. The larger vessels required to execute these short-season fisheries in our large and increasingly rough seas are expensive to make boat payments on, to insure, to maintain and operate, and to crew, so any impacts to the fishing season increase the odds that more Unangaŷ fishermen won't break even on expenses. As noted across Alaska, we also feel the cumulative impacts on essential subsistence harvests that the loss of commercial fishing opportunities creates, perhaps even more so when it is hundreds of dollars' worth of fuel to afford to leave the dock, a cost many cannot afford without the support of a commercial catch.

The pertinent point from the 2021 anomalous chum harvest is that it was entirely due to the increase in active permits being fished by individuals that have not developed local knowledge about effective chum avoidance, nor had yet to commit to the regional self-regulation that has been an integral part of resident and long-term fishermen's fishing processes for decades. Allowing these newly formalized collaborative efforts to continue to address chum conservation will bring benefits to the stocks in ways that we believe these proposals cannot, while also providing a test case for the future of effective, but complex, voluntary measures that can do what simpler management levers cannot.

While the primary driver for slowed chum growth, reduced in-river spawning success, and reduced runs is thought by biologists to stem from widespread environmental change, this is not a threat faced by western Alaska alone, but by all of Alaska. Our region's reliance on unpredictably-changing fisheries is front and center when our fishermen consider the implications of each morning's weather report, each season's harvest forecast, and every year-end settlement check. In Alaska, we literally pay for the consequences of our over-reliance on fossil fuels, first when we heat our homes and fuel up our boats at the nation's highest costs, and then again when we head out to find out what the sea has in store.

As our collective actions have forced much of the environmental change we are experiencing, we are also empowered to provide for the resilience and adaptation that our fisheries will increasingly require. Continually improving our understanding of these fisheries' composition, origins and shifting limitations safeguards against being blindsided by abrupt change and may even allow us to take management actions to lessen coming impacts proactively. Ongoing and expanded genetic studies are just one of these important actions the Board has influence over, but perhaps even more effectively, actively seeking, supporting and formalizing the successful voluntary fishing partnerships that improve conservation would continue Alaska's history of innovative fisheries management.

We look forward to when the State of Alaska is able to fully implement Alaska Tribal recognition through full Tribal consultations, including at the Alaska Board of Fisheries, to better protect and

facilitate Alaska Native subsistence needs, and also protect and support our Tribal right to an economy. Qagaasakuq, qaĝaasakung, and qagaalakux for your time and your consideration.

Sincerely,

Rachel Lekanoff, M.S.

Qawalangin Tribe of Unalaska, Enrolled Tribal Member

Qawalangin Tribe of Unalaska, Fisheries Manager

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 133: Oppose	**Proposal 136:** Oppose	**Proposal 139:** Oppose	**Proposal 148:** Oppose
Proposal 134: Oppose	**Proposal 137:** Oppose	**Proposal 140:** Oppose	**Proposal 149:** Oppose
Proposal 135: Oppose	**Proposal 138:** Oppose	**Proposal 143:** Oppose	**Proposal 150:** Oppose

PC131

February 4, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I participate in commercial, subsistence, sport, and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is very important; commercial fishing is my main source of income.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Edward Reed
edwardreed21@yahoo.com
(704) 253-2009

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC132

February 5, 2023

Dear Chair Carlson-Van Dort and members of the Board of Fisheries,

I am writing in **SUPPORT of Proposal #140** to amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time in Area M.

The salmon fishing closures on the Yukon River have been devastating to those who depend on salmon to feed themselves. An integral part of Yukon River subsistence culture has been taken away. The ANS for all Yukon River salmon species isn't being met, nor are the escapement goals.

We know that some salmon stocks bound for the Yukon are caught in the June mixed-stock fishery in these Area M districts. And while there is uncertainty as to what percentage of each salmon stock bound for the Yukon is taken in the June fishery, we are at the point where we must do everything we possibly can to reduce unwanted harvest of these Yukon River stocks.

Going back to the 2001-2003 management plan as this proposal requests, and also adding King salmon to the plan, is a necessary step we should take now to prevent more interception of Yukon bound salmon stocks.

These are my personal comments. I am also a member of the Fairbanks Fish & Game Advisory Committee that is the proponent of this proposal.

Sincerely,

Mark Richards – Fairbanks

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 140: Support

PC133

Submitted by: Ricky Roberts

Community of Residence: Cold Bay, Alaska

Comment: I am writing this letter in OPPOSITION TO Proposal 103 that reduces the coho possession limit for sockeye and coho salmon in salt waters and freshwater drainages of Cold Bay. I have read the proposal and conclude the following based on the data provided.

Coho surveys from 1990 through 2008 averaged 2,955 fish and the most recent survey in 2022 was 3500. This represents almost a 20 percent increases in the fish counts per your own data. The person submitting this proposal appears to be basing this request on sockeye data alone. I feel the best solution to any changes based on this data is to reduce the harvest of gill net and commercial fishing in saltwater for sockeye and leave the coho creel freshwater limits at 5 per day. This is what the data supports. If in the future more data shows a reduced count of coho then a proposal such as this would justify a reduced limit. There is an economic coast to approving a proposal that reduces creel limits in Russel Creek that will affect the guides and local hotel in Cold Bay. The cost of airfare and lodging to catch and retain two coho daily would not fare well with local business. I am not a guide or hotel owner, but an approval would most likely affect these businesses.

Professionally,

Ricky Roberts

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 103: Oppose

PC134

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, and personal use fisheries. Commercial salmon fishing is my main source of income and is my absolute favorite thing to do. Salmon fishing in the South Alaska Peninsula region is important to my community because it generates a lot of jobs for the people who live here.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Seth Roehl
sdp.kid@hotmail.com
(907) 891-0762

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC135

January 23, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in Sand Point, Alaska and I participate in commercial fisheries. Salmon fishing in the South Alaska Peninsula region is very important. Salmon is the main economic driver in our community—it keeps the lights on and put food on our table. It also provides money through taxes to keep our school operating.

Sincerely,

John Rotter
melanie.rotter@gmail.com
(907) 386-6568

PC136

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska and I participate in commercial fisheries. Pease do not shut down Area M. Fishing brings in more money to the community. Salmon fishing in the South Alaska Peninsula region is very important for subsistence and income.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Megan Russell
mnr0093@gmail.com
(907) 386-6158

PC137

Submitted by: Richard Rysewyk

Community of Residence: Coleman, Wisconsin

Comment: - I Support the PROPOSAL 120 With Amendments due to time concerns.

- I Support PROPOSAL 128 to help allow more fish to pass through to get to the Nelson Lagoon fishery.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 120: Support With Amendments

Proposal 128: Support

PC138

Submitted by: Derrick Rysewyk

Community of Residence: Coleman, Wisconsin

Comment: - I Support the PROPOSAL 120 With Amendments due to time concerns.

- I Support PROPOSAL 128 to help allow more fish to pass through to get to the Nelson Lagoon fishery.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 120: Support With Amendments

Proposal 128: Support

PC139

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove and Nelson Lagoon, Alaska and I participate in commercial fisheries. I set net in Nelson Lagoon. I have fished 25 years there. It's the only income for the entire town. Salmon fishing in the South Alaska Peninsula region is very important as a way of living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Sincerely,

Craig Rysewyk
rysewykauto@hotmail.com
(907) 497-7018

PC140

February 2, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. I was born and raised in a family that has made our living on salmon fishing. Salmon fishing in the South Alaska Peninsula region is our only means of earning money, and we hope to pass it down to the next generation to continue.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Catharine Samuelson
cmskingcove@msn.com
(907) 497-2202

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC141

February 4, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove and False Pass, Alaska and I participate in commercial, subsistence, and personal use fisheries. I've been fishing out of King Cove for 53 years. Salmon fishing in the South Alaska Peninsula region is one of our main sources of income and makes up all family operations.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Herman Samuelson
fvamandadawn@gmail.com
(907) 497-2202

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC142

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in subsistence and personal use fisheries. I am a maintenance man in the King Cove Clinic. I used to fish, but not anymore. Salmon fishing in the South Alaska Peninsula region is very important. I have family and friends that rely on the fisheries for a living.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

John G Samuelson
kvcsamuelsons@gmail.com
(907) 497-7709

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC143

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial, subsistence, and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is very important because it pays the bills.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Phillip Samuelson
Philmo497@gmail.com
(907) 497-7611

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC144

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial fisheries. I've been a commercial fisherman for majority of my life. Salmon fishing in the South Alaska Peninsula region provides income and food.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Ian Samuelson
iansamuelsontheman@hotmail.com
(907) 717-6919

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC145

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is very important as a way of living. I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

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Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Thomas Samuelson
kvcvictoria07@gmail.com
(907) 497-7705

PC146

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in subsistence, sport, and personal use fisheries, as well as through local business supporting fisheries. I have worked at the Harbor House during the busiest times of the year for salmon fishing for the past five years. Salmon fishing is important to the city of King Cove because it supplies the community with multiple jobs ranging from helping crews with moving their gear so they are able to go out and fish to store workers as well. To thrive, the community depends a lot on fisherman and salmon fishing in general. Salmon fishing in the South Alaska Peninsula region has provided me a job for the past five years. A lot of my family members rely on fishing as a way of life, and a source of income.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Victoria Samuelson
kvcvictoria07@gmail.com
(907) 497-7708

PC147

February 1, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Petersburg, Alaska and I participate in commercial fisheries. I have spent my last five summers in Area M seining for salmon. Salmon fishing in the South Alaska Peninsula region is very important to me. I don't understand with all that's been happening across Alaskan fisheries—why are we targeting the small guys when the draggers are the problem?

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Louden Sandhofer
loudsand@gmail.com
(907) 518-4404

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC148

Submitted by: Paul Schaack

Community of Residence: Cold Bay, Alaska

Comment: Proposal 120. Please modify fishing period times as to allow proper conservation measures for the Nelson Lagoon river systems.

Our fishery has been decimated over the past years from constant interception of our salmon runs.

Thank you for your time and consideration in this matter helping to preserve our way of life for future generations.

Proposal 128. Please consider reducing mesh depth in the Northern District as a way to allow more of the run to pass on to their streams in Nelson Lagoon. Thank you.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 120: Support **Proposal 128:** Support

PC149

Submitted by: Chad Schierman

Community of Residence: Wasilla, AK

Comment: Proposal 140 - Support - Intercept harvest of non-local chinook and chum salmon for Cook Inlet and other areas is a conservation and common-use concern.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 140: Support

PC150

To: Alaska Board of Fisheries

From: Daniel Schindler, PhD. Professor of Aquatic and Fishery Sciences, University of Washington;
deschind@uw.edu

RE: Concerns for interceptions of western Alaska chum and Chinook salmon in Area M salmon fisheries as relevant to Proposal #140

Date: February 6, 2023

I am submitting this written testimony for consideration in deliberations about the importance of interceptions of western Alaska chum and Chinook salmon in Alaska's Southern Area-M fisheries.

1) It is clear that chum and Chinook salmon returning to western Alaska rivers (e.g., Kuskokwim, Yukon, Nushagak, and Norton Sound rivers) are severely depressed at present. The productivity and the abundance of both species are obviously being negatively impacted from unknown but regionally coherent stresses. While complete stock assessments are not available for many of the major stocks in this region, the existing data clearly show the extent of the current conservation crisis.

   A few examples where reliable data exist serve as useful illustrations of the magnitude of the current problem:

   (a) Kwethluk River (Kuskokwim): Escapement of chum salmon in 2022 was the lowest ever observed and shows a decline of over 90% compared to the average observed in the preceding decade.

   (b) Salmon River of the Aniak River (Kuskokwim): Escapements of chum salmon in 2021 and 2022 are the lowest ever observed and show a decline of 86% compared to the average observed in the preceding decade.

   (c) George River (Kuskokwim): Escapements of chum salmon in 2021 and 2022 showed a decline of about 84% compared to the average observed in the preceding decade.

   (d) Kogrukluk River (Kuskokwim): Escapements of chum salmon in 2021 and 2022 showed about a 83% decline compared to the previous decadal average escapement. The average of these two years was about half of the number of fish needed to meet the minimum escapement goal, failing in both years.

   (e) Yukon River: summer chum failed to meet the minimum escapement goal of 500,000 in both 2021 and 2022, showing about an 85% decline compared to the previous decadal average escapement. In both 2021 and 2022 subsistence communities on the Yukon River had no directed fishing opportunities for either summer chum or Chinook salmon for the entire season.

   (f) Anvik River (Yukon): summer chum failed to meet escapement in both 2021 and 2022, showing a decline of over 90% compared to the previous decadal average escapement.

   (g) Kuskokwim River: subsistence harvest of Chinook salmon has been severely restricted since 2014. Subsistence communities on the Kuskokwim have not met their chum subsistence needs since 2019.

2) Due to conservation concerns and following the basic principles that guide salmon management in Alaska, chum and Chinook salmon fisheries in western Alaska have been severely restricted or closed in the last decade to protect spawning populations to build back the stock abundances.

3) It has been known for decades that Area M sockeye salmon fisheries intercept chum salmon destined for western Alaska rivers. These interceptions have been a conservation concern in the past, motivating the WASSIP study in the early 2000s to identify the stock of origin of chum salmon (and sockeye salmon) in these fisheries. While ongoing GSI analyses of chum salmon caught in Area M fisheries should provide reasonable estimates of the number of fish caught from the Coastal Western Alaska stock grouping, it is not possible to precisely quantify the biological impacts of Area M interceptions on potential yield from individual western Alaska chum salmon stocks. To do so would require reliable estimates of escapements to these rivers which currently do not exist across the region.

4) Despite the dismal state of chum salmon in western Alaska, commercial fisheries in Area M continue to exploit these populations without restriction. This is antithetical to the sustained yield principle of the Alaska Constitution and in direct conflict with Alaska's Sustainable Salmon Policy. As described above, it is presently impossible to precisely quantify the biological impacts of Area M interceptions on potential yield from individual western Alaska chum salmon stocks. However, interceptions are certainly reducing the potential for chum salmon to contribute to meeting escapement goals where they exist and, by extension, are contributing to the reduced abundances in watersheds throughout the region. If terminal fisheries, which in this case are primarily subsistence fisheries, have been restricted or completely closed throughout western Alaska, it is not conceivable how to technically or legally justify maintaining harvest of these same western Alaska salmon stocks in Area M. In the face of uncertainty regarding impacts of Area M, the Sustainable Salmon Policy directs the Board to take action that errs on the side of conservation when population viability is threatened to ensure sustained yield management in western Alaska rivers with documented severely depressed escapements.

   There are distinct technical and logistical challenges to managing mixed-stock fisheries such as those in Area M but it is incumbent on the Board of Fisheries to implement regulations to manage these fisheries in a manner that is consistent with Alaska statute mandating sustained yield management of wild stocks, including the "policy for the management of mixed stock salmon fisheries" from the Sustainable Salmon Policy. This is currently not the case in Area M fisheries which continue a documented harvest of severely declined western Alaska chum salmon stocks. Continued harvest of stocks during periods of very low productivity also increases the extinction risk of weak populations that are harvested in the stock aggregate.

5) Alaska statute (16.05.258) requires that subsistence use of wild fish is given priority over other consumptive uses. Only after subsistence needs have been satisfied should the state allow other harvest, including by commercial fisheries. This statute is currently being ignored as subsistence harvests of chum salmon throughout western Alaska have been severely restricted or closed while commercial fisheries continue to harvest fish from severely declined stocks.

6) It is important to recognize that establishing escapement goals based on reference points derived from typical stock-recruit analyses will often suggest changes to escapement goals that do not embrace precautionary management. In particular, when the productivity of a stock declines, as is currently the case for western Alaska chum and Chinook salmon, a stock-recruit analysis using standard methods will

estimate the escapement that produces maximum sustainable yield as lower than when the stock is experiencing a high productivity regime.

While it might be tempting to lower existing escapement goals for chum and Chinook salmon while they are in this period of low productivity, it is critical to consider other consequences of doing so. First, a standard stock-recruit model assumes that all fish in the stock are components of a single well-mixed population. However, it is widely recognized that the level of stock aggregation used in management integrates across substantial population diversity. Said another way, management 'stocks' are collections of individual populations that migrate to different tributaries within watersheds and often demonstrate their own dynamics that are not necessarily in sync with the overall stock aggregate. One risk of reducing escapement goals is that it puts particularly weak stocks within these stock complexes at increased risk of extinction. For example, work on western Alaska Chinook salmon by Connors et al. (2020, 2022) shows a distinct tradeoff between managing for Maximum Sustainable Yield (MSY) assuming a stock is a homogeneous population versus managing to prevent extinctions of weak stocks within a mixture of populations. Reducing escapement goals to achieve MSY under low productivity regimes distinctly increases the extinction risk of weak populations that are harvested in the stock aggregate.

A second important risk associated with reducing escapement goals at present is associated with the widespread declines in body sizes of chum, Chinook, (and sockeye) salmon throughout western Alaska (Oke et al. 2020). Declining body sizes of spawning fish translate into reduced reproductive potential for fish in the escapement. For example, Ohlberger et al. (2020) estimated that since the 1970s the reproductive potential (i.e. the combined number and size of eggs) of the average female Chinook salmon in the Yukon River declined by 24-35%. Staton et al. (2021) found similar trends towards reduced reproductive potential in Kuskokwim River Chinook salmon over the same time period. Incorporating these demographic trends into assessment models showed that biological reference points (i.e. escapements that produce MSY) used to inform escapement goals will increase to account for declining fish size and associated escapement quality (Staton et al. 2021). Thus, using assessment models that are conditioned on historical data when fish were large will systematically underestimate the number of fish needed to maximize yield, given current body sizes.

While similar analyses have not been done for Alaska chum salmon, the same principles apply to these species as well, and chum salmon are another species showing pronounced declines in body size throughout Alaska (Oke et al. 2020). Reductions of escapement goals for chum salmon during this period of both reduced productivity and declining escapement quality would not constitute precautionary management to sustain yields and conserve stocks that are currently depressed.

References

Connors BM et al. 2020. Incorporating harvest-population diversity trade-offs into harvest policy analyses of salmon management in large river basins. Canadian Journal of Fisheries and Aquatic Sciences https://doi.org/10.1139/cjfas-2019-0282

Connors BM et al. 2022. Chinook salmon diversity contributes to fishery stability and trade-offs with mixed-stock harvest. Ecological Applications https://doi.org/10.1002/eap.2709

Ohlberger J. et al. 2020. The reproductive value of large females: consequences of shifts in demographic structure for population reproductive potential in Chinook salmon. Canadian Journal of Fisheries and Aquatic Sciences 77: 1292-1301.

Oke KB et al. 2020. Recent declines in salmon body size impact ecosystems and fisheries. Nature Communications 11(1): doi:10.1038/s41467-020-17726-z.

Staton, BA et al. 2021. Incorporating demographic information into spawner-recruit analyses alters biological reference point estimates for a western Alaska salmon population. Canadian Journal of Fisheries and Aquatic Sciences 78: 1755-1769.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 105: Oppose **Proposal 140:** Support

An assessment of sockeye salmon population dynamics at Chignik, Alaska, and relevance to management reference points

(proposal 105)

Daniel E. Schindler[1] and Curry J. Cunningham[2]

[1] School of Aquatic and Fishery Sciences, University of Washington, Seattle WA; deschind@uw.edu

[2] Department of Fisheries, University of Alaska-Fairbanks, Juneau AK; cjcunningham@alaska.edu

February 6, 2023

Executive Summary

1. Sockeye salmon originating from the Chignik watershed on the Alaska Peninsula have supported valuable commercial and subsistence fisheries for over a century. Sockeye salmon production in this system declined precipitously in 2018, prompting concern that escapement goals should be changed to account for declining productivity to maximize yield from these systems.
2. Using data from brood tables compiled by the Alaska Department of Fish & Game, we fit time-varying Ricker stock-recruit models to estimate the relationships between escapement and subsequent returns to the Early and Late sockeye salmon runs to Chignik, and compared these relationships to one derived from a combined brood table that collapses the two stocks into a single stock-recruitment relationship. We fit these models to alternative brood tables that have been used in management, each of which covers a different time frame. From the best-fit models, we estimated the escapement that would produce MSY over the long-term (S_{msy}) and allowed this quantity to vary through time to reflect changes in the productivity of Chignik sockeye salmon. Each of these parameters was estimated with uncertainties expressed as 50% and 95% Bayesian credible intervals.
3. Stock-recruit models fit to data collected from 1983 onwards, as opposed to the full time series beginning in brood year 1922, were distinctly uncertain. These models produced poorly defined estimates of both Ricker parameters and the escapements most likely to maximize sustained yield (S_{msy}), with the most likely values varying by a factor of more than 10X for the Late Run, Early Run, and with the two stocks combined into one (Merged). There simply was not enough biological information in these datasets to produce reliable estimates of S_{msy}.
4. Stock-recruit models fit to the entire time series of data available (i.e. since 1922) were much better defined and had much less uncertainty in the biological reference points (e.g., S_{msy}) than for the recent data sets. Estimates of S_{msy} were made for each of the stocks using the following datasets: brood tables from 1922-2013 that were used in management up to 2021, and brood tables that truncated this earlier brood table at 1983 and added the brood table for 1983-2014 that was created in 2022. Model estimates of S_{msy} for the last 5 years from the time-varying Ricker model decreased substantially (-54, -28, and -97 thousand fish for the Early, Late, and Merged

runs, respectively) by combining the recent brood table with the historical data, indicating substantially different information content in the recent brood table. The recent revised run reconstruction clearly changed the biological signal in the brood tables used historically in management. We encourage transparent description of the methods used in the recent run reconstruction and their subsequent peer review because the new brood tables clearly change the biological reference points derived from these data.

5. While there appear to be only minor effects of combining the Early and Late runs into a single demographic unit for estimating S_{msy} to the Chignik watershed, managing this system as though it is a single homogenous stock does not follow precautionary management – particularly when the component populations are struggling. The history of sockeye management at Chignik embraced the opportunity to manage different stock components independently. This strategy was developed to protect stock diversity and maximize long-term yield from this ecosystem. Recent changes in the fishery management approach are not justified by any scientific reasoning but may be placing Chignik sockeye at risk of overharvest of stock components – particularly of the Early Run.

6. Comparison of the temporal changes in the productivity of Chignik sockeye salmon with other sockeye stocks in the Gulf of Alaska suggests some degree of regionwide coherence in reduced recruitment during the last few brood years. These patterns suggest that the recent downturn in the productivity of Chignik sockeye may be a response to anomalous climate conditions observed in the Gulf of Alaska over most of the last decade, and not necessarily a reflection of degrading habitat in the Chignik watershed alone.

Introduction

Sockeye salmon have supported a valuable commercial fishery at Chignik, Alaska, for over a century and have been a mainstay of the subsistence livelihoods of local communities for millennia. High quality data on escapements to the watershed are available because of the operation of a weir that has been used since the 1920s to accurately enumerate fish as they migrate into the watershed. The quality of the data on spawning fish at Chignik provides a rare opportunity for detailed analyses of the relationship between spawning stock size and the subsequent recruitment with time series of data that are more complete than for most other salmon stocks in Alaska. Such 'stock-recruit' relationships form the basis for developing biological reference points for establishing escapement goals used in fishery management.

While the abundance of Chignik sockeye salmon has varied substantially over the last century, catastrophic run failures in 2018-2022 greatly curtailed commercial fisheries in the Chignik Management Area and raised concerns that Chignik sockeye salmon stocks had entered a period of reduced productivity. These recent run failures coincided with abnormally warm sea surface temperatures that have developed in the Gulf of Alaska since 2014 and also with long-term changes in the geomorphic conditions in the Chignik watershed. Such changes in the ecosystems Chignik salmon inhabit for completing their life cycles, and the concurrent changes in sockeye abundances, have prompted the question of whether management reference points (i.e., escapement goals) should be adapted to accommodate changes in the productivity of Chignik sockeye salmon. The goal of this report is to analyze the most recently available data on Chignik sockeye salmon to quantify changes in stock productivity and estimate the escapement most likely to produce maximum sustainable yield (S_{msy}).

The Chignik sockeye fishery is somewhat unique in Alaska because it is supported by two genetically distinct dominant stocks that migrate to the watershed at different times of the season. The 'Early Run' stock primarily migrates to the watershed in June and early July and spawns in the upper regions of the watershed that drain to Black Lake. The 'Late Run' stock migrates to the watershed primarily in July and August and most of these fish spawn in Chignik Lake and its tributaries. For most of the last half-century, these two stocks have been managed as independent populations (Dahlberg 1968) because of the logistical ease of partitioning escapements to each of the two dominant stocks. Development of genetic stock identification (GSI) approaches for the Chignik system by the Alaska Department of Fish & Game distinctly refined this technique to a state-of-the-art technology for assessing stock structure during the fishing season. The development of hierarchical models for analyzing GSI data at Chignik have further improved their utility for in-season management (DeFilippo et al. 2020). However, a recent escapement goal review by the ADFG concluded that managing the two Chignik sockeye salmon runs as independent stocks with their own escapement goals was unnecessary (Finkle et al. 2022). The justification for this conclusion was based on an assumption of a single competitive bottleneck for juvenile rearing in Chignik Lake, of both the Early and Late runs, that apparently harmonizes the productivities of the two stock components. While there is overlap in juvenile rearing between the two stock components, there is no conclusive evidence that the two stocks operate demographically as a single homogeneous unit. Thus, as part of the analyses presented in this report, we assess differences in the scientific support for establishing different management reference points if considering Chignik sockeye salmon as composed of two demographically unique stocks (as has been done historically) or as a single homogenous stock (as has been proposed).

For this report we fit 'Ricker' stock-recruit relationships for each of the Early Run and the Late Run stocks of sockeye salmon in the Chignik watershed based on brood table data provided by ADFG. For each stock we used a time-varying model to quantify how the productivity of each has varied through time and the corresponding estimates of S_{msy}. A detailed description of our statistical methods are given at the end of this report.

We estimated S_{msy} using several different brood tables that have been used in fishery management at Chignik. The '*Historical*' dataset includes brood years from 1922 to 2013 and was used in management prior to 2022. The '*Recent*' dataset includes a revised pair of brood tables released by ADFG in 2022 that includes brood years 1983 to 2014. Thus, the *Recent* dataset includes a single additional brood year but it is also important to note that previous values of the brood table were also different than what is reported in the *Historical* dataset because a new run reconstruction was applied for revising the brood tables. We also combined these two brood tables into a '*Merged*' dataset that uses the *Historical* brood table for brood years 1922 to 1982 and the *Recent* brood table for all subsequent brood years until 2014. We also generated a '*Combined Stocks*' brood table by adding the Early Run and Late Run brood tables into a single data set, for each of the time strata described above.

Results and Discussion

A) Effects of different data sets on estimates of S_{msy}

Model estimates of S_{msy} from the time-varying Ricker model were sensitive to the data used to inform them. The *Recent* dataset produced estimates of S_{msy} that were highly uncertain, with 95% credible intervals spanning an order of magnitude or more (Table 1, Figures 1-3). The values of S_{msy} estimated with the *Historical* dataset were both substantially higher for the recent decade than from the *Recent* dataset, and were far less uncertain.

Estimates of S_{msy} from the *Merged* datasets were less uncertain than model estimates using the *Recent* dataset. Time trends in S_{msy} estimated using the model with the *Merged* dataset emphasized the recent trend towards lower productivity during the last decade of brood years (Figures 1-3). While the model predicted parallel declines in productivity from the *Historical* dataset, the recent downturn in productivity (and therefore S_{msy}) was less pronounced compared to trends produced from the *Recent* datasets.

There were two differences between the *Historical* and the *Merged* datasets that had important effects on model estimates of S_{msy}. First, the *Merged* dataset included a single additional brood year (2014) of data; however, the influence of a single datapoint on the model interpretation of a time series as long as this one is minimal. The more important difference is from the new run reconstruction that was used to generate the *Recent* dataset. When incorporated into the *Merged* dataset it is clear that the information contained in the *Recent* brood tables are fundamentally different than for the same years in the *Historical* dataset.

We encourage a more complete description and proper vetting of the run reconstruction model used to populate the *Current* brood table. As far as we can tell a description of this modeling effort has not been made public and therefore it is impossible to assess its adequacy.

Table 1. Estimates of the escapement most likely to produce maximum sustainable yield (S_{msy}) with a time-varying Ricker stock-recruitment model fit to different datasets for the Early Run, Late Run, and the Combined Stocks of Chignik sockeye salmon. Values are the average for the last five brood years (2010-2014) and expressed in thousands of fish. Also given are the 95% and 50% Bayesian credible intervals for S_{msy}. The datasets include different brood years and are described above.

	Brood Years	S_{msy} median	95% CI	50% CI
Early Run				
Historical	1922 - 2013	356	246 - 479	321 - 393
Recent	1983 - 2014	313	135 – 2,267	234 - 456
Merged	1922 - 2014	302	155 - 423	258 - 343
Late Run				
Historical	1922 - 2013	301	246 - 369	281 - 322
Recent	1983 – 2014	320	167 – 2,481	242 - 494
Merged	1922 – 2014	273	210 - 345	252 - 296
Combined Stocks				
Historical	1922 - 2013	702	565 - 868	653 - 754
Recent	1983 – 2014	714	340 – 8,005	529 – 1,108
Merged	1922 – 2014	605	439 - 776	550 - 660

B) Effects of combining brood tables to produce a single escapement goal for Chignik sockeye salmon

Model estimates of S_{msy} under current conditions for the Early and Late runs were 356,000 and 301,000 when using the *Historical* dataset, and 302,000 and 273,000 when using the *Merged* dataset (Table 1), corresponding to totals of 657,000 and 575,000 for the entire system. When the brood tables for the two dominant stocks were collapsed into a single brood table the *Historical* data produced a value of 702,000 and the *Merged* data produced a value of 605,000 for S_{msy} (Table 1). These values are within the current escapement goal range proposed for the aggregate Chignik sockeye salmon stock in 2022 by ADFG (Finkle et al. 2022).

While collapsing the Early Run and Late Run into one stock characterized by a single brood table had only modest effects on S_{msy} for the entire system, this does not mean it is a rational management strategy. Essentially all stock designations for salmon in Alaska are actually aggregates of demographic units or sub-populations. It is widely acknowledged that harvesting these stock aggregates has distinct risks to unproductive stock components when they are harvested simultaneously with productive stock components. Managing stock aggregates is a reality in most Alaska systems because there is no temporal or spatial separation among stock components when they are vulnerable to fisheries. However, Chignik is a unique situation because the migration season is so long and there is so much separation between the timing of when the Early Run and the Late Run are vulnerable to fisheries. This is the reason why Chignik sockeye have been managed as two distinct stocks for decades. While there is some uncertainty associated with the transition point from the Early Stock to the Late Stock during any fishing season, ADFG

developed the genetics techniques needed to perform rapid, precise, and affordable stock identification in-season. Further, the department collaborated with the University of Washington to develop the statistical models needed to maximize the information that could be derived from in-season genetic sampling so that the utility of GSI was further increased for in-season management (DeFilippo et al. 2020). Thus, there are no scientific reasons for managing Chignik sockeye as a single stock and, in fact, this approach carries substantial risk of overexploiting weak stock components (e.g., the current state of the Early Run).

C) Regional effects on sockeye salmon recruitment in the Gulf of Alaska

While there are well-known changes to sockeye salmon habitat occurring in the Chignik Lakes watershed, particularly in the lake level and volume of Black Lake, the consequences of these changes for the productivity of the sockeye stocks is not fully understood. Some hold the perspective that these changes in habitat are the explanation for the depressed productivity seen in Chignik sockeye over the last 5 years. In fact, this hypothesis provided the rationale for the recent revision of Chignik escapement goals by ADFG and the proposal to manage Chignik sockeye as a single homogeneous stock (Finkle et al. 2022). While this hypothesis is plausible, it is not the only possible explanation for current depressed productivity of these sockeye stocks.

One alternative explanation for recent depressed productivity of Chignik sockeye is that the development of the marine heatwave that started in 2014 had serious negative impacts on the survival of Chignik smolts in the Gulf of Alaska. If this alternative mechanism was contributing to the currently depressed productivity of Chignik sockeye stocks then we could expect that other sockeye salmon stocks from rivers draining to the Gulf of Alaska might show similar recent dynamics in the productivity of their sockeye populations.

To explore this question we fit the same time-varying Ricker stock-recruitment models to other sockeye salmon stocks that enter into the Gulf of Alaska and for which there are recent brood tables (provided by ADFG). Inspection of the changes in the time-varying 'alpha' parameter is a useful indicator for assessing temporal changes in stock productivity.

In Figure 4 below, we show time-series of estimates of sockeye salmon productivity (Ricker 'alpha') for the two Chignik sockeye stocks and several others from the Gulf of Alaska. Several key patterns emerge from this figure that are relevant to the conversation about the causes of current downturn in productivity of Chignik sockeye salmon.

First, Chignik sockeye productivity was depressed during most of the time period between 1940-1960 which is coincident with a well-described cold-phase of the Pacific Decadal Oscillation which negatively affected marine growing conditions for sockeye salmon (Mantua et al. 1997). Following this period of depressed productivity, Chignik sockeye experienced a long regime of high productivity which remained high from about 1980 – 2010. Brood years since 2010 have shown declining productivity but to about the same levels as observed from 1940-1960.

Second, using only the *Recent* dataset for brood years from 1983-2014 to assess changes in Chignik sockeye productivity strongly emphasizes the influence of the last two complete brood years. Thus, time-series models fit to the *Recent* dataset tend to chase individual observations more than trends that are

determined by the long-term data. Thus, models from the *Recent* brood tables are both highly uncertain (as described above) and also tend to over-emphasize the most recent two years of observations.

Last, when the temporal changes in the productivity of Chignik sockeye are put in a regional context, they do not appear to be exceptional. Sockeye stocks returning to Frazer, Upper Olga, and Lower Olga have all shown below-average productivity since 2000. The Ayakulik and two Karluk stocks have not shown any systematic changes during this time period. Notably, however, both the early run and late run sockeye in Karluk showed pronounced crashes in productivity in the mid-2000's but then recovered rapidly to roughly average conditions since that time. This last example illustrates that short-term crashes in productivity can be common, particularly when diagnosed with modest datasets (such as the *Recent* dataset used in Chignik), which can mislead interpretations about the long-term trends in productivity of sockeye salmon stocks.

Figure 1. Model estimates of changes in S_{msy} for the Early Run of Chignik sockeye salmon using a dynamic Ricker model and different datasets. The top panel shows results from using the 1922 – 2013 '*Historical*' dataset, the middle is from 1983-2014 '*Current*' dataset, and the bottom panel shows results from the '*Merged*' dataset. The colored polygons are the 50% (dark pink) and 90% (light pink) credible intervals.

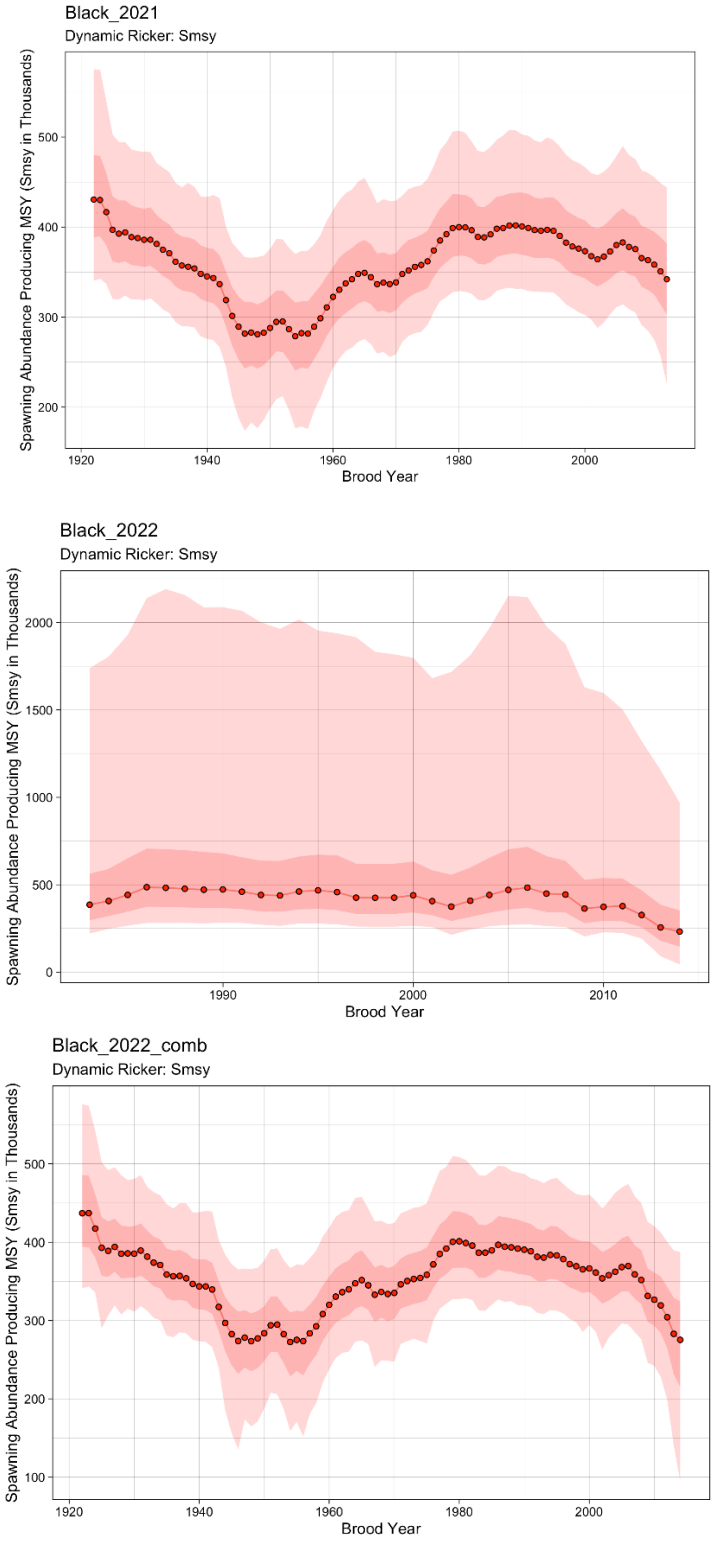
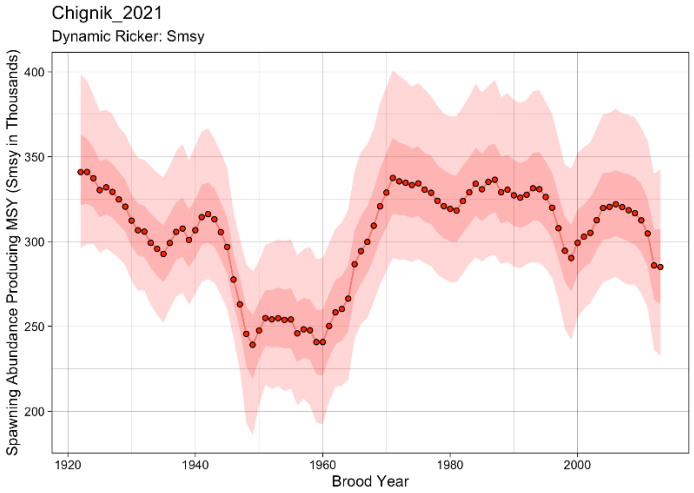
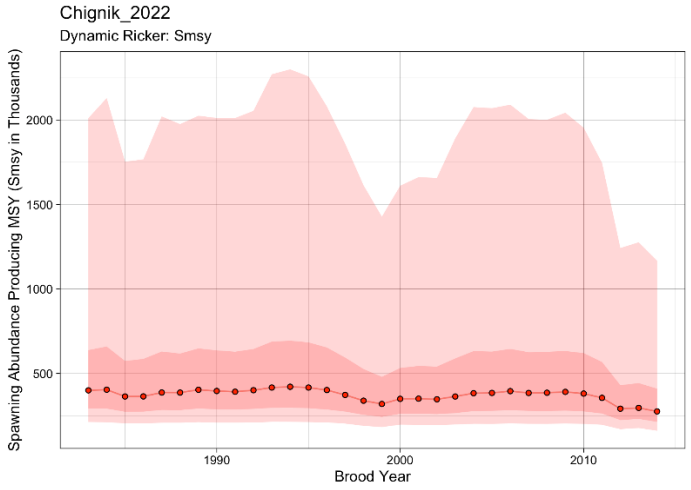


Figure 2. Model estimates of changes in S_{msy} for the Late Run of Chignik sockeye salmon using a dynamic Ricker model and different datasets. The top panel shows results from using the 1922 – 2013 '*Historical*' dataset, the middle is from 1983-2014 '*Current*' dataset, and the bottom panel shows results from the '*Merged*' dataset. The colored polygons are the 50% (dark pink) and 90% (light pink) credible intervals.





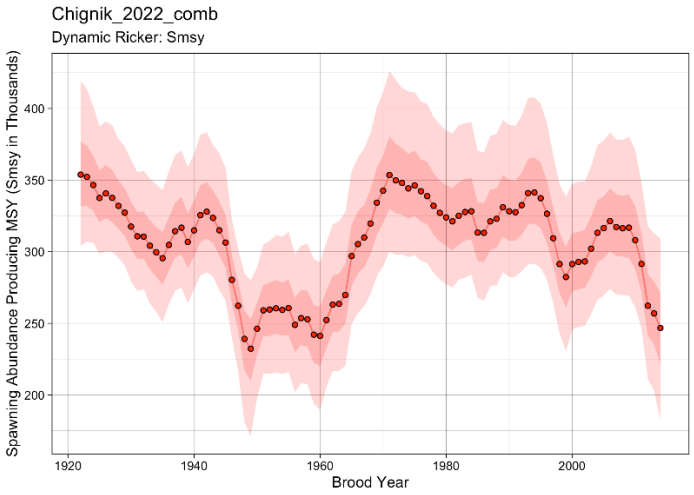


Figure 3. Model estimates of changes in S_{msy} for the Combined stock of Chignik sockeye salmon using a dynamic Ricker model and different datasets. The top panel shows results from using the 1922 – 2013 '*Historical*' dataset, the middle is from 1983-2014 '*Current*' dataset, and the bottom panel shows results from the '*Merged*' dataset. The colored polygons are the 50% (dark pink) and 90% (light pink) credible intervals.

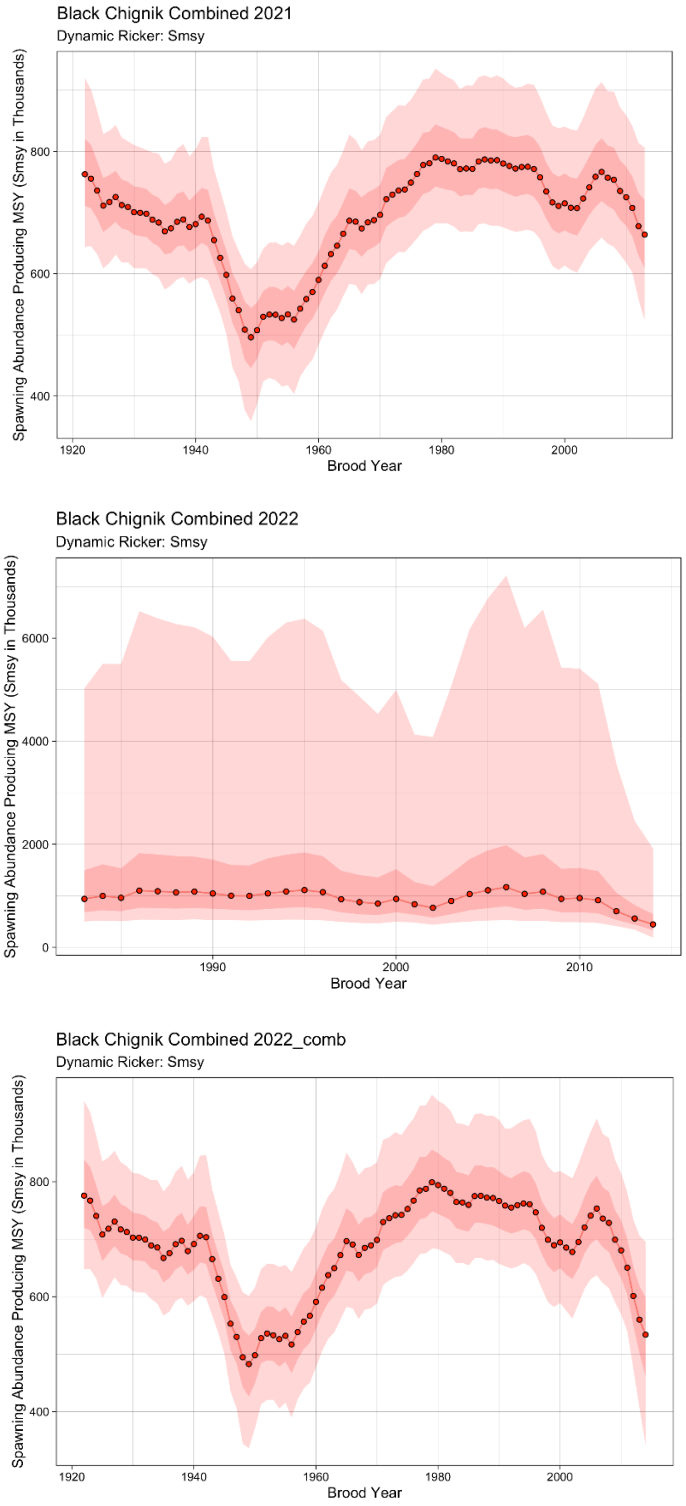
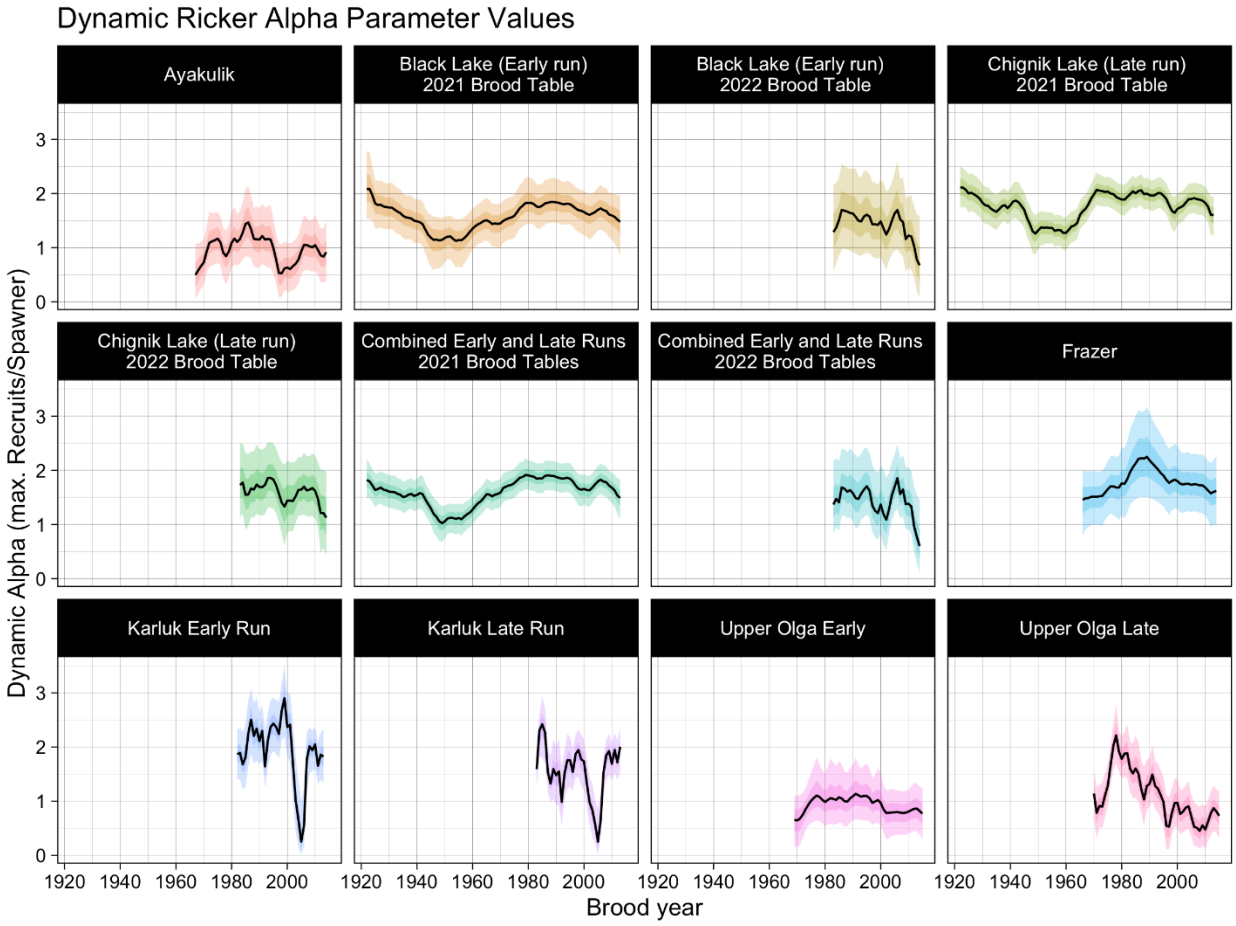


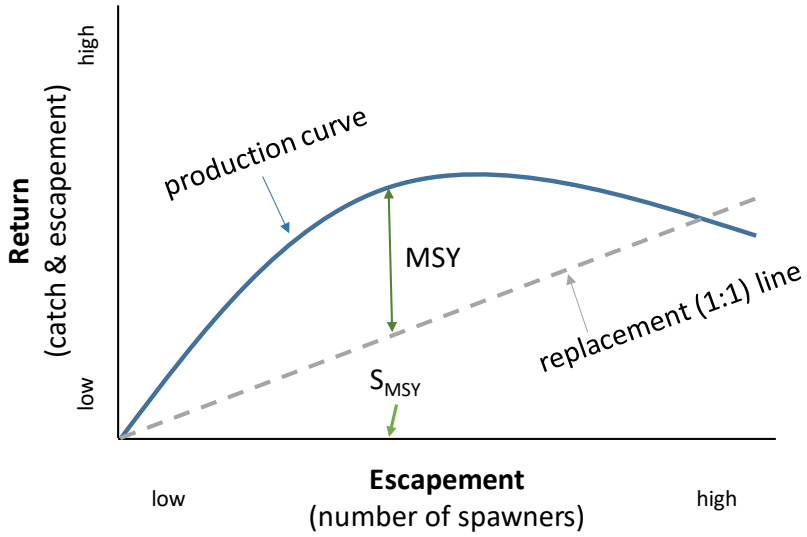
Figure 4. Time-series of estimated productivity (Ricker alpha) for the Early Run and Late Run of Chignik sockeye salmon, with models fit to different brood tables, compared to estimates for other sockeye salmon stocks in the Gulf of Alaska. Black lines represent the median values, and the dark and light shaded regions representing the 50% and 90% Bayesian credible intervals.



Overview of Methods and Definitions.

We used a standard approach for assessing the productivity and management reference points for sockeye salmon in the Chignik watershed. This approach involves statistically fitting a 'Ricker stock-recruit' relationship to existing data to quantify the expected number of sockeye salmon that will be produced (return) by a specific escapement abundance. In general, when comparing escapements that are relatively low, the number of fish that are produced (the return) increases as escapement is increased (Figure 5). However, as the escapement continues to increase fish will eventually saturate the amount of spawning habitat available to them, or the amount of food available for their juveniles, such that competition begins to be important at intermediate escapement levels. Thus, the curve describing the relationship between the returns and the escapement will bend over and eventually flatten off where there are no additional returns generated by increasing the number of fish on the spawning grounds (Figure 5). In extreme conditions, this curve can actually start declining at the very highest escapement levels where exceptionally high escapements can theoretically reduce the overall production from the system.

Figure 5. Illustration of the expected relationship between the Escapement in a brood year and the Return, which is the number of fish in the catch and the escapement that are produced from a brood year. Here the relationship is labeled the 'production curve'. Also shown is the 1:1 'replacement line' which shows how many returns are needed to replace that number of fish in the escapement. The difference between the production curve and the replacement line is equal to the yield, which is the number of fish produced from any brood year in excess of the number needed to replace the fish that spawned. Maximum sustainable yield (MSY) is equal to the largest yield (i.e. the maximum difference between the production curve and the replacement line) and is expected to occur at intermediate escapements at a spawner abundance denoted S_{msy} (i.e., spawners that produce MSY). Because S_{msy} is a parameter that is estimated with considerable uncertainty, it is typically reported as a median and a range that encompasses 95% or 50% of the possible parameter values. The slope of the production curve at low escapement values is determined by the parameter alpha (α), with higher values characterizing more productive regimes.



If the stock-recruit relationship (i.e. the 'production curve') is compared to the 'replacement line' (the 1:1 line that describes how many fish will be needed to simply replace the escapement), it is possible to estimate the 'yield' at different escapement levels. In Figure 5, this corresponds to the difference between the number of fish produced at a given escapement level, and the number of fish needed for replacement. This area is the banana-shaped region in Figure 1, between the dashed replacement line and the solid production curve. As shown in Figure 5, yield is maximized at intermediate values of escapement. At low escapements, the yield is small because the spawning grounds are not saturated. At high escapement, the yield is low because competition for resources is intense and most fish are needed simply to replace the spawning stock. Thus, the maximum sustainable yield (termed MSY) is the maximum number of fish that a stock can produce, on average, above what is needed to replace the spawning population. This value of MSY corresponds to an escapement (termed S_{msy}) that produces the maximum sustainable yield over the long-term. S_{msy} always occurs at intermediate escapement levels.

In situations where there are sufficient high-quality data to determine this relationship for a specific stock of salmon, it is possible to estimate the value of S_{msy} (i.e. the escapement that will produce maximum sustainable yield), and the expected yield at that escapement (i.e., MSY). These parameters are the key reference points used to establish Biological Escapement Goals (BEG) by ADFG. Because fisheries data are noisy and the fact that this simple model will never represent all of the ecological processes that affect production in salmon stocks, estimates of S_{msy} and MSY have considerable amounts of uncertainty associated with them. Thus, when estimating these parameters from data, it is important to report the best value of the estimate (typically reported as the median of possible values) and a range of possible values such as the 50% or the 95% credible interval. Parameters that are estimated with very wide credible intervals have a great deal of uncertainty associated with them.

Methods:

To estimate S_{msy} and MSY we fit spawner-recruitment relationships to brood table data for the stocks described in the main body of this report. A Ricker model was used to represent the spawner-recruit relationship, assuming log-normally distributed errors.

$$R_t = S_t * \exp(\alpha - S_t\beta) * \exp(\varepsilon)$$

$$\varepsilon \sim N(0, \sigma)$$

S_t is the number of individuals spawning in year t, and R_t is the recruitment or adult production from spawning in brood year t, returning anywhere from 2 to 8 years later. Estimated parameters include the maximal productivity in the absence of density-dependent compensation (α), the density-dependent parameter (β), and the standard deviation for the lognormal error distribution (σ). Parameters were estimated using Bayesian methods for two reasons: 1) a Bayesian analysis allows the uncertainty in parameter estimates (α, β, σ) and estimates of derived quantities of interest (S_{msy} and MSY) to be directly quantified, and 2) Bayesian methods allow incorporation of prior information (Gelman et al. 2004) about the parameter describing the decline in the natural log of recruits-per-spawner with increasing spawning stock size (β), which is often poorly defined by the available time series of data.

We estimated S_{msy} and MSY using the explicit solution described in Scheuerell (2016).

We ran the model allowing for productivity (α) to change through time but not equilibrium stock size (β) due to its difficulty to estimate. Alpha was allowed to vary according to the following autoregressive process:

$$\alpha_t = \alpha_{t-1} + dev_{t-1}$$

$$dev_t \sim Normal(0, \sigma_\alpha)$$

where α_t was constrained to be greater than 0.

Samples were generated from posterior distributions for model and derived parameters using RStan (Stan Development Team 2023). We ran three chains, each for 40,000 iterations, thinning at a rate of 1/5, and removed the first 50% of samples as a "burn-in".

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PC151

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I participate in commercial fisheries. I am an Area M seiner and a member of the Area M Seiners Association. I have been fishing for more than 50 years. I don't know why we are fighting this battle once again. The science seems to be clear and the latest data backs up the small impact the Area M chum catches have on western Alaska chum runs. The Area M fishermen are working to reduce the June chum catches and we will continue to do so. We would like support from this board in our efforts to refine bycatch reduction. Seining in Area M is an important part of my fishing operation. It supports me, my crew and the villages where we fish.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Peter Schonberg
pschonberg@aol.com
(808) 937-6641

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC152

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. My family relies deeply on the fishing income. Salmon fishing in the South Alaska Peninsula region is very important because it is what many people count on.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Graydon Severian
gpseverian@gmail.com
(907) 299-5384

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC153

Submitted by: Mark Severson

Community of Residence: Petersburg, AK

Comment: SEE ATTACHED

OPPOSE 106, 109, 119,120, 126, 128, 133-143, & 148 - 150

SUPPORT 107, 108, 110, 112, 115, 116, 130, 131, 144 - 146, & 152

Proposals 148 and 149 speak to wild stock conservation and subsistence priority.

Principle 2, "Most mixed stock fisheries are long standing and have been scrutinized many times by past boards. Consequently, existing regulatory management plans are understood to incorporate conservation burden and allocation."

Principle 3, The policy should recognize that salmon resources are generally fully utilized and that stability is an important aspect of the fisheries."

2021 CFEC Census Tables, 3 permits were owned by residents of False Pass, 48 of King Cove, 2 of Cold Bay, 17 of Nelson Lagood, 88 of Sand Point, and 5 of Petersburg. Further in 2022, Alaska residents own 269 of these permits. Consistency in access to these fisheries are important for the ability of these permit holders and their crews to provide for their families.

Principle 4, "new or expanding fisheries on mixed stocks may potentially change management schemes for conservation or may change existing allocations."

The Area M salmon fisheries are neither new or expanding. They were established prior to the Limited Entry Act and among the original fisheries to be permitted by CFEC in 1975.

Further the Boards' Mixed Stock Policy states, "Intrinsic within the management of mixed stocks is the question of how conservation and allocation of weaker stocks which may be present shall be achieved. In each regulatory decision, the board must weigh how harvests of healthy stocks will be managed in order to protect less robust components of fisheries."

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC153

February 1, 2023

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Alaska Peninsula, Aleutian Islands, Chignik Finfish Proposal Comments

Dear Madam Chair Carlson-Van Dort and Board of Fisheries Members,

We live in Petersburg and own the FV Jodi Marie along with our son Aaron Severson. He has been fishing in the Alaska Peninsula Area M since 2018. He left his family in Southeast for the last five years for new opportunities far away from home. He has observed and excelled in this unique fishing area. He admires and respects its people and culture.

We are writing today in opposition to proposals 148 and 149 that would substantially reduce fishing periods in Area M. We are sympathetic to the drastic declines in Chinook and chum salmon returns in recent years and hardships faced by subsistence communities.

We do not believe however that this decline is caused by the Area M mixed stock salmon fisheries. Collaborative research between NOAA Fisheries and the ADF&G identified several factors in Chinkook and chum salmon declines including: warm water temperatures in recent years, changes in what salmon and their prey eat, changes in fish metabolism and growth rates and changes in maturity that produce fewer eggs.

We also do not buy the argument by the Alaska pollock trawl fleet that they are not impacting Chinook and chum during their fishery. The picture added to their commentary in the January 2023 Pacific Fishing magazine shows a haul of at least 100,000 pounds of Bering Sea Pollock. They claim to count every fish but we know how impossible that is especially with a load of that enormous amount. They are observed but that is random and we question the authenticity of their actual numbers. More effort is needed on the part of the drag fleet community.

The Area M salmon fisheries are neither new nor expanding. They were established prior to the Limited Entry Act and among the original fisheries to be permitted by CFEC in 1975.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science does not support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community, King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Area M fishermen are cognizant of the poor salmon returns to the Yukon and Kuskokwim Rivers and have taken voluntary actions in 2022 . They reduced their chum harvest by 50% from 2021. These measures, in cooperation with ADF&G, included test fisheries and voluntary stand downs. The fleet is actively coordinating similar efforts for 2023.

We oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.

We hope you consider for approval the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Please maintain the status quo for the current ADF&G Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Mark and Karen Severson
FV Jodi Marie
Box 1502
Petersburg, AK 99833

PC154

January 23, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Petersburg, Alaska and I participate in commercial fisheries. I seined in southeast Alaska every summer since childhood. A string of poor returns and harsh management resulting in severely reduced fishing time led me to Area M in 2018. Ample time to fish each year since has made it possible to make a living for myself and my crew and our families. The fish aren't coming by every day—further reduction of fishing time in June would likely put us out of business. We did a great job of self-regulating last summer. There are many variables regarding the decline of AYK chum; please don't ruin the livelihood of all who rely on Area M salmon fishing by caving to political pressure. Science and reason should decide this argument. Making us all sacrificial scapegoats won't solve anything.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your time.

Sincerely,

Aaron Severson
aaronseverson50@hotmail.com
(907) 518-4255

PC155

Submitted by: Batbara Shangin

Community of Residence: Atka Alaska

Comment: The ocean is my source of life. I remember the abundance of the sea, growing up in the Aleutians. It's not the case any more because, the whole world is taking out of the pacific even effecting the chain of other animals that survive off it. The Alaska Natives people only take what will sustain them they are the ones who are experts in subsisting. The rest of the word is taking million tons out of the ocean. think about That.

I went home after 33 years of being gone, they told me they have to go father away to get seal or sea lion and they don't see the see birds in the bays around where they live. This is the consequence of over fishing. Taking more out for their riches and comfort, taking away from the people who depend on for their livelihood . So it only a few who benefit from the ocean and the management is only for certain people who are fishing to much affecting the ecosystem for all the rest of us who have to live here in Alaska. Who depend on subsistence off the seas around them .

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Silver Bay SEAFOODS
208 Lake Street, Suite 2E, Sitka, Alaska 99835
Phone: 907.209.3037 E-mail: abby.fredrick@silverbayseafoods.com

PC156

February 6, 2023

Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811
Submitted via email: dfg.bof.comments@alaska.gov

RE: Opposition to Proposals 106, 109, 119-120, 126, 128, 133 – 143, 148-150

Dear Alaska Board of Fisheries Members:

Thank you for the opportunity to comment on proposals under your consideration at the upcoming Alaska Board of Fisheries (BOF) meeting for Alaska Peninsula/Aleutian Island/Chignik Finfish scheduled February 20-25, 2023. **Silver Bay Seafoods opposes proposals that seek reductions in commercial fishing opportunities in the Area M fisheries; we support status quo management and industry solutions for additional weak-stock avoidance measures.** Specifically, we oppose Proposals 106, 109, 119-120, 126, 128, 133 – 143, 148-150.

Silver Bay Seafoods is a fisherman-owned, Alaska seafood processing company. Our False Pass facility supports purse seine and drift gillnet fishermen who participate in the Alaska Peninsula fisheries. We are fully integrated in the region and are present in multiple AK Peninsula communities. In addition to the facility and fishermen services in False Pass, Silver Bay operates a public commercial fishing supply store in King Cove, we employ full-time support staff in Cold Bay for critical logistics, and we have additional fishermen services in Sand Point. The False Pass facility began operating in 2019 after considerable investment by Silver Bay and our fishermen partners. The decision to invest long-term in this region was made strategically based on Alaska's long history and commitment to basing fisheries management on sound science, sustained yield principles, and policies that tactically guide management of mixed stock fisheries for the long-term health of all of Alaska's salmon stocks.

Salmon fisheries can and do fluctuate, and the current management plans are built to provide a management system with a goal of sustained yield over time. Additionally, these plans have been adopted by previous boards to ensure the burden of conservation is shared. The South Peninsula fisheries are mixed stock fisheries, which directs harvest pressure over a larger area, distributes harvest temporally throughout various salmon runs, and dilutes impacts to weaker stocks. Alaska's salmon industry and communities rely upon stable fisheries, most of which are mixed stock fisheries – these fisheries should be recognized and protected by the Board.

We recognize and share concern about the poor salmon returns seriously impacting subsistence users along the Yukon River. This is an important issue and we, like many other Alaskans, have sought answers to the cause and explored possible remedies. State and federal researchers have described the situation as complex and primarily related to issues with near-shore marine survival, citing warming waters, food availability, increased marine mammal predation, and other factors. Research has not

pointed to harvest in other fisheries as the "smoking gun" cause or even the remedy to addressing these poor salmon returns.

The fishing industry has not avoided additional examination of these fisheries. In fact, we welcomed ADF&G biologists into our facility last season and provided them with full access to collect genetic samples of the daily salmon harvest. ADF&G collected a robust sample size of chum salmon caught in the South Peninsula fishery in 2022 to better understand where these fish were headed. The stock composition results for the June fishery for all gear types confirmed the Asia group contributed the largest proportion of the harvest in June with an estimated 315,162 fish (58.0%). The Coastal Western Alaskan (CWAK) group which combines Bristol Bay, Kuskokwim, Yukon and Norton Sound, had an estimated 96,116 fish (17.7%). While we don't know how many fish in particular were heading to each main stem system (clarity from ADF&G welcome, if available), we could make some rough assumptions and say each accounts for 25% of the CWAK group. This would mean less than 25,000 fish could have been destined for the Yukon. This estimated 25,000 fish does not account for more than a million missing Yukon summer chum. We look forward to learning more from this research project in the coming years, but we think this first year provides important insight.

In addition to supporting additional research, we took immediate action to show our fellow Alaskans we are committed to real solutions even if we are not the cause of this problem. We worked closely with our fishing partners to support a fleet-wide voluntary chum avoidance program in the June South Peninsula fishery in 2022. The fleet used information from an early season ADF&G test fishery and hourly in season harvest data to take voluntary stand downs throughout the June fishery. **This cooperative effort was unprecedented and extremely effective; it reduced chum harvest in 2022 by 50% compared to 2021.** There is great support amongst the industry for continuing and improving this program in 2023 with increased access to real-time harvest data and added accountability measures.

As members of the Alaska fishing community, Silver Bay Seafoods joined with other Bristol Bay and Kodiak processors to donate 74,000 pounds of salmon to Yukon River Villages. This is the second year in a row we have participated in this food relief effort. We recognize this salmon donation does not replace the customary and traditional subsistence harvest that feeds these Yukon River communities. We sincerely hope for a rebound in the performance of these salmon runs.

In closing, we look forward to working with the BOF, ADF&G and other stakeholders at the upcoming meeting to explore meaningful, science-supported solutions. Thank you for the opportunity to comment.

Respectfully,

Abby Fredrick
Director of Communications & Investor Relations

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose	**Proposal 128:** Oppose	**Proposal 137:** Oppose	**Proposal 142:** Oppose
Proposal 109: Oppose	**Proposal 133:** Oppose	**Proposal 138:** Oppose	**Proposal 143:** Oppose
Proposal 119: Oppose	**Proposal 134:** Oppose	**Proposal 139:** Oppose	**Proposal 148:** Oppose
Proposal 120: Oppose	**Proposal 135:** Oppose	**Proposal 140:** Oppose	**Proposal 149:** Oppose
Proposal 126: Oppose	**Proposal 136:** Oppose	**Proposal 141:** Oppose	**Proposal 150:** Oppose

PC157

Alaska State Board of Fisheries
RE: February 2023 Alaska Peninsula and Chignik Finfish Meeting
1/2/2023

Dear Board of Fisheries:
My name is Edgar Smith, I am a Area M Setnet fisherman. I fish the Shumagin Island and South East District Mainland (Southeastern District of Area M). I started fishing in 1975, been to alot of fishery meetings since then, seen our setnet fishery change through many management plans. From weekly openings to quotas, and caps on select species in the past 50 years. I can only speak on my fishery (Area M Setnet) and the area I fish (Southeastern District).

Our gear consists of two 100 fathom gillnets, which are anchored on both ends and are stationary in the water column. The nets are affected by the direction the tide is running, the amount of algae in the water. At most our nets are fishing 12 hours in a 24 hour period, this is due the tide running in, ebbing which at most times bellies the net the wrong way, causing the fish to lead off the net. In essence, I am a setnetter. I need **time!** The June fishery and July fishery has set days when the season is open. The June fishery works well with its time periods, but would like to see the July and August months with these days open in the Southeastern District.

July: (2 days fishing, 2 days closed)
6:00 am July 6 until 3:00 PM July 7 33 hours, 6:00 AM July 10 until 10:00 PM July 11 40 hours, 6:00 AM July 14 until 10:00 PM July 15 40 hours. 6:00 AM July 18 until 10:00 PM July 19 40 hours, 6:00 AM July 22 until 10:00 PM July 23 40 hours, 6:00 AM July 26 until 10:00 PM July 27 40 hours 6:00 AM July 30 until 10:00 PM Sunday, July 31 40 hours,
Can be amended in proposal 146.

August: (2 days fishing, 2 days closed)
7:00 am August 3rd until August 4th 9:00 pm 38 hours, 7:00 am August 7th until August 8th 9:00 pm 38 hours, 7:00 am August 11th until August 12th 9:00 pm 38 hours, 7:00 am August 15th until August 16th 6:00 pm 38 hours, 7:00 am August 18th until August 19th 6:00 pm 38 hours, 7:00 am August 22nd until August 23rd 6:00 pm 38 hours, 7:00 am August 25th until August 26th 6:00 pm 38 hours, 7:00 am August 29th until August 30th 6:00 pm 38 hours,

In the past two years, the fish and game has managed the pink runs on the back side in the escapement, i.e. they have waited to get escapement plus surplus to the streams before they open the season, which has made the opening for pinks around middle or end of August. A setnetter needs **time**, we can't operate on spot openings in select areas and the back side of a run, we need to fish on the capes where the fish are traveling. This is why i am proposing set openings as stated above for the setnetters in Augustin the Southeastern District.
Can be amended in proposal 146.

If the Board of Fisheries creates a management plan for Chignik in the Western District for June and July. Make the SEDM management plan coincide with openings in the Western District in June up to July 25th. If Board of Fish doesn't permit Chignik fishermen fishing in the Western District in June and July on set times, then connect the SEDM to the Dogoi/Pavalof quota of 190,000 red salmon quota and open the SEDM with with the Dolgoi/Pavalof openings in June up to July 25th.
Can be amended in proposal 131.

I support proposal 132 Tthe Department of Fish and Game, making the Chignik escapement mode to one run timing. With this the SEDM management plan should be reflective of this change. Remove all caps and quotas in the SEDM management plan. The SEDM fishery is one of the oldest fisheries in this state, but we can't fish there and haven't fished there in decades ,which is wrong. In looking at all the tagging studies done, 1922 to present, including the WASSP study, it shows without a doubt, the SEDM on the top end only catches 50% of red salmon heading east maybe going to Chignik, the more realistic catch rate is probably down around 30%. Also there were no samples taken in June in the SEDM in the four years, 2006 to 2009 the WASSP study was sampling. And the samples were at a higher rate compared to other sampled areas, i.e. 4500 fish harvested with 900 samples, that is almost 25%, even as high as 100%, most other areas were down in single digits of percent sampled.

In capping for Area M, South Eastern District For Set Net Fisheries:

1. Connect SEDM to Chignik Western District openings and/or put under Dolgoi/Pavlof red salmon quota of 190,000 in June and July and coincide openings with Dolgoi/Pavlof area.
   Amend Proposals 131 and 132.

2. Extend July openings by 4 hours to 10:00pm in July and 3 hours, 9;00pm in August, extend set openings to the end of August.
   Amend Proposal 146

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 98: Support
Proposal 99: Support
Proposal 100: Support
Proposal 101: Support
Proposal 102: Support
Proposal 103: Oppose
Proposal 104: Support
Proposal 105: Support With Amendments
Proposal 106: Support With Amendments
Proposal 107: Support With Amendments
Proposal 108: Support With Amendments
Proposal 109: Oppose
Proposal 110: Support With Amendments
Proposal 111: Support
Proposal 112: Oppose
Proposal 113: Support With Amendments
Proposal 114: Support
Proposal 115: Support
Proposal 116: Support
Proposal 117: Support
Proposal 118: Support
Proposal 119: Support With Amendments
Proposal 120: Support With Amendments
Proposal 121: Support With Amendments
Proposal 122: Support With Amendments
Proposal 123: Support With Amendments
Proposal 124: Support With Amendments
Proposal 125: Support With Amendments
Proposal 126: Oppose
Proposal 127: Oppose
Proposal 128: Support With Amendments
Proposal 129: Support With Amendments
Proposal 130: Support
Proposal 131: Support With Amendments
Proposal 132: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support With Amendments
Proposal 145: Support With Amendments
Proposal 146: Support With Amendments
Proposal 147: Support With Amendments
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 151: Oppose
Proposal 152: Oppose

PC158

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial, subsistence, and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is the only income we have.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

James Smith
jimhoppaakc@yahoo.com
(907) 444-7890

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC159

January 31, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Akutan, Alaska and I participate in subsistence fisheries. I am the Akutan Traditional Council Tribal Administrator. Salmon fishing in the South Alaska Peninsula region provides a food source for my community and family as well as income to the members in the community who have IFQs.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Robin Stepetin
qigiigun.tribe1@outlook.com
(907) 698-2300

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC160

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Akutan, Alaska and I participate in subsistence, sport, and personal use fisheries. I am a passed Area M fisherman. I started fishing in the 60s. I fished for Peter Pan Seafoods aboard the Catherine Jane with Captain/owner Robert Newman. Back in those days, there was no commercial bottom fish fisheries, or midwater trawl fisheries in the Bering Sea. Salmon was abundant then, and no complaints from other area fishing districts, but when the bottom trawl, and mid water trawl fisheries started in the Bering Sea, that's when I noticed the decline of salmon in most all salmon fishing districts, according to ADFG reports, so "Area M, " is not to blame for the decline in the salmon fisheries affecting Yukon/Kusko. District. Salmon fishing in the South Alaska Peninsula region is very important! We are subsistence users, and there are some locals that go to Sand Point and False Pass during the summer for salmon fishing. This fishery provides income for their families for food, pay bills, etc.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Jacob Stepetin
stepetinj@outlook.com
(907) 381-6062

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC161

Submitted by: Charles Summerville

Community of Residence: Cold BAy , Alaska

Comment: 100% oppose #103 by Candice Nielsen the new Mayor. who won by a coin toss as their is clearly not a majority of residents who support it as it's written. In my opinion the subsistence nets are doing more damage than all the sport pressure combined, and devastating the small creek of Swan lake outlet and Mortensen Lagoon. . The proposal has no basis at all and makes no sense the way it is written , They are talking about Swan Lake and Kinzarof lagoon conflicts, which are 1 small isolated areas in all of the Cold Bay Drainages accessible by 4 wheeler or truck from town. And they want to over regulate the entire Drainage of over 60 miles of coldbay beachfront including the whole ocean and 5-6 creeks, As a Rural resident of Cold Bay and a Small business owner this boils down to Insanity, trying to shut down all of the cold Bay drainages because of a few peoples interpretation of User conflict on one small stream of Swan Lake. Why should our family and our guests be punished if we choose to harvest our 5 Silver Salmon or Sockeye Salmon with a rod and reel vs a Subsistence net, If anything this will cause more harm to the fishery because if the local rural sport fishers such as myself are limited to 2 Coho per day by rod and reel, We will just go out and put Subsistence nets out and truly compete with the 2-3 other local families that are trying to ram this new regulation down everyones throat and encompassing all of Cold Bay drainage and numerous small creeks and rivers, that get hardly any use from Either Subsistence or Sport fishing. The whole proposal is trying to mix apples and oranges and confuse outsiders of what's really going on, if the runs are already depleted according to them, Why open up more area to Net fishing and take sport rights away. And with the comparisons of Kodiak Island And Unalaska this is nonsense as there are only between 45-60 residents of Coldbay VS Kodiak over 10,000 and Unalaska's large populations. This whole proposal boils down to the Hatfields and McCoy syndrome of a few small groups wanting to fight with other groups in the same small community. And in the end the hard data from F&G and others does not support the recommendations harsh changes from 5 to 2 fish daily, as very few sport fisherman even fish for sockeyes during July and Early August. In the end everyone has gotten all the fish they need for Subsistence net fishing and Sport fishing living in peace and harmony. The whole world and unfortunately rural Alaska is changing and its never gonna be the way it was 50 years ago no matter how restrictive of regulations that are being proposed.

Sincerely Capt Charlie Summerville and the Summerville family Box 26 Coldbay Alaska.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 103: Oppose

PC162

Written Comments to the Board of Fisheries

Submitted by Chief Brian Ridley, Tanana Chiefs Conference

As the Chief/Chairman and President of Tanana Chiefs Conference (TCC), I am submitting written comments in advance of the Board of Fish meeting on February 20-25, 2023. My name is Brian Ridley, and I am from the village of Eagle on the Yukon River at the Canadian border. Though my comments are on behalf of TCC, I also have supporting resolutions from the Alaska Federation of Natives and the 574 tribes of the National Congress of American Indians that were approved this winter.

TCC appreciates the opportunity to present testimony regarding the important topics of sustainably managing Yukon River and Kuskokwim River salmon stocks, meeting salmon escapement goals and treaty obligations, and providing priority subsistence salmon fishing opportunities consistent with state law, which requires the elimination of non-subsistence uses when harvestable surpluses are insufficient to provide for all customary and traditional subsistence uses.

To start, the Alaska Board of Fisheries (Board) should seriously take its' statutory obligations to provide for customary and traditional subsistence salmon fishing opportunities first before providing commercial fishing opportunities. When harvestable surpluses of salmon are insufficient to provide for all subsistence uses, the law states that non-subsistence uses are to be eliminated first before restricting subsistence opportunities.

According to the Board's website and Alaska state statute 16.05.251, the Board is directed by law to "adopt subsistence regulations that provide reasonable opportunity for subsistence uses first before providing for other uses..." This is a subsistence priority and the Board continues to fail to not only prioritize subsistence, but fail to ensure sustainability of the salmon populations. The Board is also failing to follow the sustainable salmon fisheries management policy, and the mixed stock fishery policy in its management plan for the South Alaska Peninsula June Intercept Salmon Fishery.

Proposal 140

TCC encourages the Board to adopt Proposal 140 submitted by the Fairbanks Fish and Game Advisory Committee's Fisheries Subcommittee. While TCC submitted Proposal 139 to reduce the June interception of salmon bound for the TCC region in Area M, TCC asks the Board to "Take No Action" on our proposal as long as the Board adopts Proposal 140.

Commercial harvests have been prioritized over subsistence and the livelihood of our people for too long. In 2021 when there were no chum salmon harvests on the Yukon, over 740,000 Western Alaska chum were legally caught between Area M and the Bering Sea Pollock fisheries, meanwhile our people are criminals if they catch a single fish.

As the Board knows, tribal members rely on subsistence hunting, fishing and gathering for our physical, economic, cultural, and spiritual sustenance and wellbeing at the individual, household, community, and regional levels. TCC has voiced our concerns and recommendations in countless venues, and it is our hope that our continued testimony will improve subsistence opportunities for our tribal members and ensure sustainable salmon stocks and populations are available for future generations of Alaskans to continue our indigenous ways of life.

Significantly, **Yukon River salmon escapement goals and Canadian border passage treaty obligations have not been met** consistently in many years. At one point, escapement goals were met only due to a voluntary tribal moratorium on Yukon River subsistence salmon fishing. We have done our part to conserve and we are simply asking others to do the same. More recently, subsistence salmon fishing has been mandated to be closed throughout the season and still escapement goals and treaty obligations are going unmet despite the great sacrifices and hardships faced by our communities throughout the Yukon River.

Simply, the Board and the Alaska Department of Fish and Game (ADF&G) Division of Commercial Fisheries must start doing a better job of responsibly managing Alaska salmon fisheries. If not, Tribes within the AYK region will continue to see ecosystem collapse, failures to provide reasonable opportunities for customary and traditional subsistence uses, and further erosion of our indigenous ways of life.

The ADF&G, should not be allowing Area M commercial fishermen to commercially intercept, harvest, and sell chum salmon bound for the Kuskokwim and Yukon Rivers when ADF&G forecasts clearly indicate that Yukon and Kuskokwim chum salmon escapement goals are unlikely to be met.

While we acknowledge that there are a multitude of factors that are contributing to the decline of AYK salmon production, many of these are out of our direct control. It is our responsibility as indigenous stewards of the land and waters for countless generations, however, as it is your responsibility as the Alaska Board of Fisheries, to ensure that Yukon River and Kuskokwim River salmon continue to support future generations of Alaskans and our indigenous ways of life by taking necessary actions to ensure priority subsistence uses and salmon escapement goals are met. Significantly reducing the commercial interception and sale of AYK-bound salmon in Area M is entirely within your authority in order to increase the likelihood of meeting Yukon and Kuskokwim salmon escapement goals and honor the state subsistence priority statute.

As I said at AFN and NCAI, if the Board does not help us conserve this resource NOW, we will be forced to talk about lawsuits, endangered species or asking the secretary of the interior to step in. We are trying to take a systematic approach to exhaust all options before going to these measures.

In closing, TCC adamantly requests that you start prioritizing subsistence so that you are following state statutes, laws and the Board's responsibilities by adopting Proposal 140 at this regulatory meeting. The future of Alaska's salmon is in jeopardy and every decision is critical to ensuring that our salmon have a future. This is the Board's opportunity to be on the right side of history and help our salmon come back to our rivers. I ask that you make the right decision, otherwise our salmon will go extinct under your leadership.

Thank you in advance for your review and consideration of my written comments.

Mahsi Choo,
Chief/Chairman and President Brian Ridley
Tanana Chiefs Conference

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 140: Support

EXECUTIVE COMMITTEE

PRESIDENT
Fawn R. Sharp
Quinault Indian Nation

1ST VICE PRESIDENT
Mark Macarro
Pechanga Band of Luiseño Indians

RECORDING SECRETARY
Stephen Roe Lewis
Gila River Indian Community

TREASURER
Shannon Holsey
Stockbridge-Munsee Band of Mohican Indians

REGIONAL VICE PRESIDENTS

ALASKA
Mike Williams
Akiak Native Community

EASTERN OKLAHOMA
Norman Hildebrand
Wyandotte Nation

GREAT PLAINS
Harold Frazier
Cheyenne River Sioux Tribe

MIDWEST
Rebecca Crooks-Stratton
Shakopee Mdewakanton Sioux Community

NORTHEAST
Lance Gumbs
Shinnecock Indian Nation

NORTHWEST
Melvin Sheldon, Jr.
Tulalip Tribes of Washington

PACIFIC
Jack Potter
Redding Rancheria

ROCKY MOUNTAIN
VACANT

SOUTHEAST
Reggie Tupponce
Upper Mattaponi Indian Tribe

SOUTHERN PLAINS
Gonzo Flores
Lipan Apache Tribe of Texas

SOUTHWEST
Joe Garcia
Ohkay Owingeh Pueblo

WESTERN
Bernadine Burnette
Fort McDowell Yavapai Nation

EXECUTIVE DIRECTOR
Larry Wright, Jr.
Ponca Tribe of Nebraska

NCAI HEADQUARTERS
1516 P Street, N.W.
Washington, DC 20005
202.466.7767
202.466.7797 fax
www.ncai.org

The National Congress of American Indians
Resolution #SAC-22-048

TITLE: A Resolution Requesting The North Pacific Fisheries Management Council To Address Salmon Bycatch And Salmon Mortality Issues In Fisheries Of The Bering Sea / Aleutian Islands Affecting Coastal Western And Interior Alaska Salmon Stocks

WHEREAS, we, the members of the National Congress of American Indians of the United States, invoking the divine blessing of the Creator upon our efforts and purposes, in order to preserve for ourselves and our descendants the inherent sovereign rights of our Indian nations, rights secured under Indian treaties and agreements with the United States, and all other rights and benefits to which we are entitled under the laws and Constitution of the United States and the United Nations Declaration on the Rights of Indigenous Peoples, to enlighten the public toward a better understanding of the Indian people, to preserve Indian cultural values, and otherwise promote the health, safety and welfare of the Indian people, do hereby establish and submit the following resolution; and

WHEREAS, the National Congress of American Indians (NCAI) was established in 1944 and is the oldest and largest national organization of American Indian and Alaska Native tribal governments; and

WHEREAS, Alaska Natives have stewarded their territories for over 10,000 years to ensure the health, well-being, social and cultural foundation, and spiritual existence of their peoples, as well as that of the animals, lands, and waters. Alaska Natives have been dependent on those land and water resources for subsistence survival since time immemorial; and

WHEREAS, Alaska Chinook salmon runs in 2020 and 2021 were the poorest observed over the past 40 years. In 2021, the combined summer and fall Yukon River chum salmon run size was under 250,000 fish; and

WHEREAS, The continuing decline of Chinook salmon and summer and fall chum salmon in several major systems of coastal Western Alaska, particularly the Arctic-Yukon-Kuskokwim (AYK), have not reached Amounts Necessary for Subsistence for many years. The salmon decline is threatening the food security of many Alaska Natives, who bear the greatest burden of loss of salmon stocks; and

WHEREAS, The decline of run strength and average size of many salmon stocks is now threatening the continuing viability of those stocks into the future making the continued loss of Chinook and chum stocks in the AYK an extreme conservation issue; and

WHEREAS, Prohibited species catch (bycatch) of Chinook and chum salmon in the Bering Sea / Aleutian Islands federal groundfish fishery are, in part, salmon bound for the Yukon, Kuskokwim and other western Alaska Rivers. Bycatch of Chinook and chum salmon are impacting returns of those species and thus the subsistence harvest of those species. Escapement goals in many rivers in the Kuskokwim, Yukon and other western Alaska rivers are not being met; and

WHEREAS, Bycatch in U.S. federal waters is managed by the National Oceanic and Atmospheric Administration (NOAA). The North Pacific Fishery Management Council (NPFMC or "Council") is the regulatory body to NOAA in the federal waters of the North Pacific; and

WHEREAS, The Council adopted Amendment 110 in 2016 which created a comprehensive salmon bycatch avoidance program. Beginning in 2019 the Council implemented further measures designed to reduce overall Chinook PSC levels for the Eastern Bering Sea pollock fishery sectors in times of low western Alaskan Chinook salmon abundance by providing increased incentives to reduce bycatch to rebuild critically low western Alaskan Chinook stocks; and

WHEREAS, there are many other ecosystem considerations that affect salmon loss, such as the concern regarding the increased abundance of hatchery fish in the North Pacific Ocean causing reduced growth of salmon in offshore areas.

NOW THEREFORE BE IT RESOLVED, that the National Congress of American Indians (NCAI) request that the NPFMC fulfill its obligations under Amendment 110 by implementing measures that increase incentives to the pollock fleet to reduce Chinook and chum bycatch in times of low salmon abundance; and

BE IT FURTHER RESOLVED, that the National Congress of American Indians (NCAI) request that the NPFMC conduct extensive ecosystems review of the effect of productivity of wild salmon stocks within the BSAI in comparison to populations of hatchery stocks, bycatch harvest rates, and Western Alaska stock escapements of Chinook, summer and fall chum, and coho salmon. And, further, to compare the reduction of average size of all wild salmon stocks, including sockeye, to the same; and

BE IT FINALLY RESOLVED, that this resolution shall be the policy of NCAI until it is withdrawn or modified by subsequent resolution.

CERTIFICATION

The foregoing resolution was adopted by the General Assembly at the 2022 Annual Conference of the National Congress of American Indians, held in Sacramento, CA, October 30-November 4, 2022, with a quorum present.

Fawn Sharp, President

ATTEST:

Stephen Roe Lewis, Recording Secretary

PC162

ALASKA FEDERATION OF NATIVES
2022 ANNUAL CONVENTION
RESOLUTION 22-2

TITLE: A RESOLUTION REQUESTING THE ALASKA DEPARTMENT OF FISH AND GAME SUPPORT MEASURES THAT DECREASE INTERCEPT OF CHINOOK AND CHUM SALMON IN AREA M AFFECTING THE WESTERN AND INTERIOR ALASKAN SALMON CRISIS

WHEREAS: The Alaska Federation of Natives (AFN) is the largest statewide Native organization in Alaska, and its membership includes 209 federally recognized tribes, 185 village corporations, 10 regional corporations, and 12 regional nonprofit and tribal consortiums that contract and compact to run federal and state programs; and

WHEREAS: The mission of AFN is to enhance and promote the cultural, economic, and political voice of the entire Alaska Native community; and

WHEREAS: Alaska Natives have stewarded their territories for over 10,000 years to ensure the health, well-being, social and cultural foundation, and spiritual existence of their peoples, as well as that of the animals, lands, and waters since time immemorial; and

WHEREAS: The continuing decline of Chinook salmon in several major systems of the Arctic-Yukon-Kuskokwim (AYK), and the decline of summer and fall chum salmon in the AYK and in portions of the North and South Peninsula (Nelson Lagoon, Port Heiden) and the Chignik region are threatening the food security of many Alaska Native communities; and

WHEREAS: The decline of run strength and average size of many salmon stocks is now threatening the continuing viability of those stocks into the future; and

WHEREAS: Alaska Native stakeholders bear the greatest burden of loss of salmon stocks; and have not reached Amounts Necessary for Subsistence (ANS) in several systems for many years; and

WHEREAS: The South Unimak and Shumagin Islands (Area M) June fisheries harvest chinook salmon**,** sockeye salmon and chum salmon in a mixed stock fishery. These stocks of salmon are bound for Bristol Bay and the Arctic-Yukon-Kuskokwim region, as well as other areas across the North Pacific Ocean. These salmon stocks have historically been intercepted in significant numbers along the Alaska Peninsula.

WHEREAS: The Alaska Department of Fish and Game (ADF&G) is the management authority for the commercial fishing in Area M; and

WHEREAS: ADF&G's stock reports from May of 2022 show that the 2020, 2021, 2022 Western Alaska Chinook salmon runs have been the poorest on record. In most of Western Alaska, 2020 and 2021, chum salmon runs were the lowest on

record. This year was the smallest return to all spawning streams for Chinook and Chum despite being the first time in recorded history wherein Yukon River Fishermen were not allowed to harvest any salmon anywhere in the Yukon River Basin (US and Canada) at any time; and

WHEREAS: Despite a complete ban on fishing on the Yukon River, including for subsistence needs, no limitations have been placed on commercial fishermen in Area M, and commercial fishers are catching historically high numbers of chum salmon—upwards of 2.5 million fish; and

WHEREAS: In response to requests to limit commercial fishing, the ADF&G has repeatedly noted that there is insufficient genetic evidence from the 10-year-old Western Alaska Salmon Stock Identification Program (WASSIP) study to warrant reduction of Area M commercial fishing, and that a current multi-year genetic study will not be completed until 2026; and

WHEREAS: A coalition of AYK stakeholders has continually met over the last two years to promote emergency measures to reduce the harvest of Chinook and chum salmon in Area M because there is no time to wait for further genetic studies; and

WHEREAS: The Fairbanks Advisory Committee, Tanana Chiefs Conference, and other stakeholders have submitted proposals to the Alaska Board of Fisheries (BOF) to be considered at the February 2023 BOF meeting on the South Peninsula, Area M, including proposals which would revert the Area M Salmon Management Plan to the 2001-2003 Management Plan thereby significantly reducing Area M intercept harvest of Chinook and chum salmon in the June fishery.

NOW THEREFORE BE IT RESOLVED BY the delegates of the 2022 Annual Convention of the Alaska Federation of Natives to review and support Board of Fisheries proposals that significantly reduce Area M intercept harvest of Chinook and chum salmon in the June fishery; and

BE IT FURTHER RESOLVED BY the delegates of the 2022 Annual Convention of the Alaska Federation of Natives request that ADF&G conduct an extensive ecosystems review of the effect of productivity of wild salmon stocks within the Bering Sea and Aleutian Islands in comparison to populations of hatchery stocks, bycatch harvest rates, and Western Alaska stock escapements of Chinook, summer and fall chum, and coho salmon. And, further, to compare the reduction of average size of all wild salmon stocks, including sockeye, to the same.

SUBMITTED BY: TANANA CHIEFS CONFERENCE, KAWERAK INC., BETHEL NATIVE CORPORATION, SEA LION CORPORATION, ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS
BOARD ACTION: NO RECOMMENDATION
CONVENTION ACTION: PASS ON OCTOBER 22, 2022

ALASKA FEDERATION OF NATIVES
2022 ANNUAL CONVENTION
RESOLUTION 22-3

TITLE: A RESOLUTION REQUESTING THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL TO ADDRESS SALMON BYCATCH AND SALMON MORTALITY ISSUES IN FISHERIES OF THE BERING SEA / ALEUTIAN ISLANDS AFFECTING COASTAL WESTERN AND INTERIOR ALASKA SALMON STOCKS

WHEREAS: The Alaska Federation of Natives (AFN) is the largest statewide Native organization in Alaska, and its membership includes 209 federally recognized tribes, 185 village corporations, 10 regional corporations, and 12 regional nonprofit and tribal consortiums that contract and compact to run federal and state programs; and

WHEREAS: The mission of AFN is to enhance and promote the cultural, economic, and political voice of the entire Alaska Native community; and

WHEREAS: Alaska Natives have stewarded their territories for over 10,000 years to ensure the health, well-being, social and cultural foundation, and spiritual existence of their peoples, as well as that of the animals, lands, and waters. Alaska Natives have been dependent on those land and water resources for subsistence survival since time immemorial; and

WHEREAS: Alaska Chinook salmon runs in 2020 and 2021 were the poorest observed over the past 40 years. In 2021, the combined summer and fall Yukon River chum salmon run size was under 250,000 fish; and

WHEREAS: The continuing decline of Chinook salmon and summer and fall chum salmon in several major systems of coastal Western Alaska, particularly the Arctic-Yukon-Kuskokwim (AYK), have not reached Amounts Necessary for Subsistence for many years. The salmon decline is threatening the food security of many Alaska Natives, who bear the greatest burden of loss of salmon stocks; and

WHEREAS: The decline of run strength and average size of many salmon stocks is now threatening the continuing viability of those stocks into the future making the continued loss of Chinook and chum stocks in the AYK an extreme conservation issue; and

WHEREAS: Bycatch of prohibited species (PSC) of annually caught Chinook and chum salmon in the Bering Sea / Aleutian Islands (BSAI) federal groundfish fishery are, in part, AYK bound species. While not all bycatch are Yukon River bound, at least 50% are, and Yukon River escapement goals are not being met. Area M commercial fishers are catching historically high numbers of chum salmon, upwards of 2.5 million fish, but only 153,497 summer chum swam up the Yukon River in 2021,

compared to the 1.7 million that historically swam up the River every summer; and

WHEREAS: Bycatch in U.S. federal waters is managed by the National Oceanic and Atmospheric Administration (NOAA). The North Pacific Fishery Management Council (NPFMC or "Council") is the regulatory body to NOAA in the federal waters of the North Pacific; and

WHEREAS: The Council adopted Amendment 110 in 2016 which created a comprehensive salmon bycatch avoidance program. Beginning in 2019 the Council implemented further measures designed to reduce overall Chinook PSC levels for the Eastern Bering Sea pollock fishery sectors in times of low western Alaskan Chinook salmon abundance by providing increased incentives to reduce bycatch to rebuild critically low western Alaskan Chinook stocks; and

WHEREAS: There are many other ecosystem considerations that affect salmon loss, such as the concern regarding the increased abundance of hatchery fish in the North Pacific Ocean causing reduced growth of salmon in offshore areas; and

NOW, THEREFORE, BE IT RESOLVED BY the delegates of the 2022 Annual Convention of the Alaska Federation of Natives request that the NPFMC fulfill its obligations under Amendment 110 for the further reduction of Chinook and chum BSAI bycatch in times of low salmon abundance; and

AND BE IT FURTHER RESOLVED that the delegates of the 2022 Annual Convention of the Alaska Federation of Natives request that the NPFMC implement further measures that increase incentives to the pollock fleet to reduce Chinook and chum bycatch; and

AND BE IT FURTHER RESOLVED that the delegates of the 2022 Annual Convention of the Alaska Federation of Natives request that the NPFMC conduct extensive ecosystems review of the effect of productivity of wild salmon stocks within the BSAI in comparison to populations of hatchery stocks, bycatch harvest rates, and Western Alaska stock escapements of Chinook, summer and fall chum, and coho salmon. And, further, to compare the reduction of average size of all wild salmon stocks, including sockeye, to the same.

SUBMITTED BY: TANANA CHIEFS CONFERENCE, KAWERAK INC., ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS
BOARD ACTION: DO PASS
CONVENTION ACTION: PASS ON OCTOBER 22, 2022

PC163

February 2, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, and personal use fisheries. I hold an Area M seine permit and operate the F/V Decision in this fishery. I advocate for the Area M fishery through my role on the Area M Seiners Association board and have been active in development and implementation in the seine fleets' voluntary management program implemented in the 2022 June fishery. This program was designed to reduce harvest of chum salmon in the June fishery and was very successful in its first year of implementation.

Salmon fishing in the South Alaska Peninsula region makes up the majority of my family's yearly income and is the cornerstone of all the communities in the region. Without a vibrant salmon fishery, it would be nearly impossible for my family to continue to call our home HOME.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Kiley Thompson
thompsonsp73@gmail.com
(907) 952-6890

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC164

February 4, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries. I have lived my entire life in Sand Point except to attend college. Since graduating, I have returned to Sand Point to commercial fish in the winter. Salmon fishing in the South Alaska Peninsula region is very important. Salmon fishing is my primary source of income as well as how I feed myself throughout the year. I practice subsistence fishing with my family every summer in order to process fish for smoke salmon, salted salmon, and fillets for the freezer.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Madison Thompson
thompsonmadison27@gmail.com
(907) 383-5845

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC165

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is very important; our entire community depends on salmon fishing.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Heather Thompson
thompsonsdp@aol.com
(907) 383-5845

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC166

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I work in local business supporting fisheries. I manage King Cove AC Store— We sell goods to the boats that fish in the region as well as assisting crews with various needs. Salmon fishing in the South Alaska Peninsula region is extremely important on a business and personal level. Fishing in our area allows for jobs for our employees as well as additional hours worked to keep up with the demand of the boats which gives our employees more income. Fishing allows for additional job revenue through store sales as well as the crews using various for entertainment.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Mark Thompson
LTPT1972@yahoo.com
(907) 421-7092

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC167

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I work in local business supporting fisheries. I run the AC Store here in King Cove—we sell goods to the boats as well as assist with other needs. Salmon fishing in the South Alaska Peninsula region is one of the main incomes in our community. Many of us would not financially survive without it.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Kay Thompson
LTPT1972@yahoo.com
(907) 421-7203

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC168

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial fisheries. Salmon fishing in the South Alaska Peninsula is, without doubt, the main social and economic driver of all the communities in the region.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Scott Thorne
littlewoodranch@gmail.com
(208) 309-0027

February 6, 2022

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair
Via email dfg.bof.comments@alaska.gov

Chair Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (Board) Alaska Peninsula/Aleutian Island/Chignik Finfish meeting. **Trident is opposed to proposals before the Board that seek to significantly alter the regulations for the South Alaska Peninsula fisheries at this time**.

Trident Seafoods operates shoreside processing facilities in Sand Point and False Pass, which support both Area M and Chignik salmon harvesters, and shore support services in Chignik. The communities in which we operate are economically and culturally dependent on salmon harvesting and processing and we are proud to be part of a sustainable fishery that is a fabric of these communities.

We sympathize deeply with the food security issues and cultural loss faced by those in Western Alaska and other communities impacted by large-scale changes in ocean conditions and corresponding declines in salmon resources. Recognizing the importance of these issues, we appreciate the work the Alaska Department of Fish and Game (ADFG) has put into both trying to understand the root cause of the recent collapse of the Arctic-Kuskokwim-Yukon (AYK) chum run, and the genetic make-up of June chum harvest in the Area M fishery.

The ongoing surveys and research of the Salmon Ecology Program at ADFG and other partnering agencies like NOAA strongly suggests that the driver of the collapse is related to poor ocean conditions and prey availability – not harvest by the Area M salmon fleet, or incidental catch in other fisheries. We were also not surprised by the results of ADFG's 2022 chum salmon genetic study results, which show that the majority of chum in the June harvest were of Asian origin (58%), and the coastal western Alaska component (17%) is comprised of chum destined for rivers across 800 miles of coastline including Bristol Bay,[1] Kuskokwim, Yukon, Norton Sound, and other river systems. We support continued research and genetic sampling and hope to reach a point where near real-time genetic information can be collected throughout the season to better inform avoidance of western Alaska chum.

Despite the significant scientific evidence suggesting that Area M chum harvest has little impact on AYK chum returns, we worked with Area M fishermen last season who effectively cut their June chum harvest in half, when compared to 2021. This effort came at significant economic cost to the harvesters, processors, and communities that depend on the Area M fishery. The fact that the seine fleet was able to effectively carry out this agreement, in a race fishery with a large number of participants, is truly remarkable and they deserve a high degree of credit for coming to the table with a solution that is both

[1] While the stock composition estimates cannot determine what proportion of the total coastal Western Alaska or Upper Yukon chum salmon return was harvested in the Area M fisheries, it is that the Bristol Bay fishery made up a significant proportion of the total Area M June harvest -- the Nushagak's harvest and escapement alone in 2022 was 473,800 chum.

responsive and effective. We strongly support the seine fleet's proposal to strengthen and improve the voluntary measures for 2023, using near real-time reporting and better communication between fleet and processors. This means a commitment to moving off the fishing grounds or ceasing fishing when necessary to reduce chum harvest. Trident will be adding teeth to this agreement by working with our fleet to ensure that chum are not bought if harvested outside of the voluntary agreement and providing more responsive chum harvest estimates from our tenders.

Despite the success of the fleet in 2022, we recognize that a cap or time and area closure seems like a simpler approach. However, these approaches are rather blunt tools – with major implications for harvest opportunity – that fail to respond to the high degree of variability with respect to chum and sockeye abundance and distribution. Time and area closures, for example, can lead to higher chum catches because they limit the ability to the fleet to move away from areas of high chum rates to areas with fewer chum. Likewise, a chum cap severely undermines the ability of the fleet to work cooperatively, as it creates a race to the cap. Thus, supporting meaningful, adaptive, voluntary measures is the best way to achieve lower June chum harvests, while also not unduly harm the communities throughout the Aleutians East Borough.

To close, Trident appreciates the role that this Board plays in ensuring Alaska's science-driven management process is carried out and the burden it shares in sustainably managing the State's salmon resources. Thank you for the opportunity to comment.

Sincerely,

Shannon Carroll
Director, Alaska Public Affairs and Fisheries Development

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 109: Oppose
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 133: Oppose
Proposal 143: Oppose
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose

February 5, 2023

PC170

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial and personal use fisheries. I am a commercial fisherman and Area M set net fisherman. I've lived and fished here for 20+ years and have watched our fisheries dwindle in time and area. Any further loss in fishing time and area would be detrimental to my livelihood and the community as a whole.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Rob Tripp
robnoxus@icloud.com (907) 386-6069

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC171

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in subsistence and sport fisheries. I was born and raised in King Cove, Alaska. I grew up watching the fisheries over the past 50-plus years. I can remember when my father and all the fishermen in King Cove were gone the whole month of June. Over the years, their fishing time has been restricted to the point that they are lucky to fish a couple of days a week. Cutting out more days, our fishermen and families cannot survive.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

I am the CEO of the King Cove Corporation. Over the years I've watched the important impact that salmon has on our shareholders and their businesses operating their boats. Our shareholders that live in the community of King Cove depend on all of the fisheries in order to survive in today's economy. The cost of fuel, groceries, household supplies, and clothing has increased. Each of the fisheries has been shortened. Recently the crab and cod seasons were open and closed in a matter of days—not weeks, days. There hasn't been a King Crab season in two years, and other crab species have been shut down. More cuts to fishing seasons continues to have a negative impact on our local economy and businesses. The fishing industry is what our local businesses and families survive on.

King Cove during the summer is a busy time. Most of the crews on the salmon boats are comprised of the whole family in most cases. Many of our college students come home to fish and make enough money to help them continue on with their higher education. Salmon is one of the most important fisheries that contributes to the survival of our families and community. The City of King Cove and Aleutians East Borough need the fish tax from salmon to the operation of our schools, road maintenance, water/sewer/electricity, operate and maintain our harbors, and contribute to our healthcare systems. How do we survive? Many fishermen had to invest in other fisheries in order to survive. Each of those species has been cut slowly each time. Fishing in bad weather to catch in order to cover your expenses and make enough money for your family has turned into a dangerous situation. Fishing in bad weather, and in some cases the smaller boats cannot participate, puts us back into the days of the king crab fishery; it is dangerous.

PC171

I've heard many regions talk about the impact of global warming on fish and wildlife species. We too have witnessed this. It is clear that we live in a time that the impact of global warming will take all of us (State of Alaska, communities, regions, cities, boroughs, tribes, various fishing groups) working together in order that we all get through this. We do not believe in cutting one's regions means of survival in order to your region to survive. We are all in this together and the Area M fishermen have given up more and more each year. It is a sad day to watch and hear what is happening today. The communities and entities in the Alaska Peninsula and Aleutian region work together and support each other. Our communities/fishermen have contributed and made changes to our fisheries over the years. We ask that people look at the reports and the science that has been done.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Della Trumble
della.trumble@kingcovecorporation.com (907) 223-9289

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

Ugashik Setnetters Association comments on N. Peninsula Proposals

Thank you for your time Board members and support staff. We appreciate you!

Ugashik Setnetters Association comment on N. Peninsula Proposal #122
Opposed.

Many locals from Ugashik, Egegik and Pt Heiden have successfully fished in Cinder River over the years. Specifically, in 1996-1998 fishermen fished in Cinder River Lagoon and tenders were able to come into the lagoon to pick up fish at high tide. This proves it is in fact logistically feasible to fish Cinder with current regulations. Commercial salmon fishing does not have to occur in the salt water to target the Cinder River sockeye.

If a saltwater area was opened, likely Ugashik sockeye would be caught at Cinder long before there was any tower count. (Ugashik escapement commonly lags) Any burden of conservation concern for sockeye salmon in the Ugashik River system would be carried strictly by the terminal fisherman in Ugashik district while the Area M fleet continued to fish. This is not using the best science available for management and is inequitable.

Protection is inadequate in the Ugashik district due to a lack of funding and because it is a more remote area. If Cinder were opened how would this additional area be protected?

Ugashik Setnetters Association comment on N. Peninsula Proposal #123
Opposed.

If someone wants to set net in shallow waters like Bristol Bay, (Cinder River), they should understand that their net is very likely to go dry at low tides as well as their boat. That is normal set netting in Bristol Bay. Many locals from Ugashik, Egegik and Pt Heiden have successfully fished in Cinder River in the past. In 1996-1998 fishermen fished in Cinder River Lagoon and tenders were able to come in to pick up fish. This proves it is in fact logistically feasible to fish Cinder with current regulations. Commercial salmon fishing does not have to occur in the salt water to target the Cinder River sockeye.

Ilnik and Meshik Rivers have sockeye runs that are not utilized which exceed the high end of escapement goals just like Cinder River. The reason for this is likely because its more productive to fish outside for Bristol Bay fish.

If a saltwater area was opened, likely Ugashik sockeye would be caught at Cinder long before there was any tower count. (Ugashik escapement commonly lags) Any burden of conservation concern for sockeye salmon in the Ugashik River system would be carried strictly by the terminal fisherman in Ugashik district while the Area M fleet continued to fish. This is not using the best science available for management and is inequitable.

Protection is inadequate in the Ugashik district due to a lack of funding and because it is a more remote area. If Cinder were opened how would this additional area be protected?

Ugashik Setnetters Association comment on N. Peninsula Proposal #124
Opposed.

Many locals from Ugashik, Egegik and Pt Heiden have successfully fished in Cinder River over the years. Specifically, in 1996-1998 fishermen fished in Cinder River Lagoon and tenders were able to come into the lagoon to pick up fish at high tide. This proves it is in fact logistically feasible to fish Cinder with current regulations. Commercial salmon fishing does not have to occur in the salt water to target the Cinder River sockeye.

If a saltwater area was opened, likely Ugashik sockeye would be caught at Cinder long before there was any tower count. (Ugashik escapement commonly lags) Any burden of conservation concern for sockeye salmon in the Ugashik River system would be carried strictly by the terminal fisherman in Ugashik district while the Area M fleet continued to fish. This is not using the best science available for management and is inequitable.

Protection is inadequate in the Ugashik district due to a lack of funding and because it is a more remote area. If Cinder were opened how would this additional area be protected?

Ugashik Setnetters Association comment on N. Peninsula Proposal #125
Opposed.

We believe that the Area M line fishery is already much more orderly than lines in Bristol Bay. We oppose this proposal because moving even one-half mile closer to Ugashik will result in more Ugashik stocks being targeted by the Area M fleet.

Research done with the WASSIP study and Estimating the Stock Composition of Sockeye Salmon in the Outer Port Heiden and Ilnik Sections of Alaska's North Peninsula Fishery, 2014-15, show that when the Area M fleet fishes the Outer Port Heiden district up to 95% of the fish they catch can be Ugashik stocks. Ugashik does not produce big runs compared to other districts in Bristol Bay and in poor years will not be able to sustain this pressure. Our runs are normally less than 10% of the total run in Bristol Bay. On the 2023 forecast Ugashik will only be 6% of the BB run.

In addition, Outer Port Heiden is fishing on Ugashik stocks before the strength of the Ugashik run is even known. Our river and bay are notoriously hard to predict escapement until they are seen in the upper river and past the tower. Well past the time OPH had caught Ugashik fish.

It is inevitable that Ugashik runs will be smaller at some point in future. With solid 60 hour openings in OPH the Area M fleet can really nail a specific stock headed for a unique creek. This outdated management style needs to be reversed, not encouraged.

Moving the OPH line is unnecessary and will increase interception.

Ugashik Setnetters Association comment on N. Peninsula Proposal #126
Support.

Ugashik Set netters firmly support this proposal because it steers Area M to more modern fishery management policies. The way to ensure salmon runs into the future is to support escapement-based management over intercept fisheries. This proposal will put the Area M fleets' focus on the N. Peninsula stocks.

Ugashik set netters include watershed residents with generations of fishing history going back thousands of years. Families who have withstood the low runs (some years in the 1970's with no fishery at all due to low escapement.) and shouldered the burden of conservation. Most camps are families that started set netting in the 1980's and have been in Ugashik Bay for forty years. Set netters have high fidelity to their watershed and understand very well the conservation that is needed to keep this fishery sustainable. The Ugashik Set Net Association has fishermen who are active in the city, tribe, Advisory Committee, hunting and fishing management, and the biology of our river and lakes.

Research on successful sustainable fisheries around the world show that having localized terminal fishermen with an investment in future runs is very important. Research does not show transient fishermen and intercept fisheries contributing to sustainable fisheries. It is inequitable to leave the burden of conservation of the Ugashik watershed solely on the set netters and Ugashik drifters. Set netters cannot pick up established camps and move to other areas in Bristol Bay. We would not have sites or market.

We worry that when our runs are low that the strong fleet of Area M boats will continue catching Ugashik fish just 30 miles away with no sense of responsibility for Ugashik conservation. They fish in 60 hour openings every week before Ugashik has any escapement at all. Ugashik fishermen have sat with no fishing whatsoever for up to 10 days waiting for the fish. We do this so we can be assured of future runs. Area M has not stood down during these times.

Let's not repeat fishery regulation policies that resulted in lost salmon runs elsewhere. Don't set Alaska up for more trouble in the future by making this fishery more interceptive than it already is. Give our Alaskan salmon their best chance and steer the management of Area M more toward escapement-based management with terminal river fishery areas and openings.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 120: Oppose	**Proposal 123:** Oppose	**Proposal 125:** Oppose	**Proposal 129:** Oppose
Proposal 122: Oppose	**Proposal 124:** Oppose	**Proposal 126:** Support	

UNGA TRIBAL COUNCIL

P.O. Box 508
Sand Point, Alaska 99661

(907) 383-2415 / 5553 Facsimile
ungatribe@arctic.net

PC173

February 3, 2023

Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P. O. Box 115526
Juneau, Alaska 99811-5526
Dfg.bof.commnets@alaska.gov

Dear Members of the Alaska Board of Fisheries:

The Unga Tribal Council is a federally recognized Tribe, realizes the importance of our established long term fisheries in the Eastern Aleutians, a fishery our Unangan Ancestors have participated in for over 9,000 years for both subsistence and commercial use. Our fishery is important to the Economic Welfare of our people, our communities and our livelihood.

The Unga Tribal Council is providing comments to the upcoming Alaska Peninsula/Aleutian Islands/Chignik Finfish Board of Fisheries meeting taking place February 20-25, 2023 in Anchorage, Alaska opposing unfavorable restrictions, reduced fishing times along with negative impacts adversely affecting our fishermen and communities in Area M.

The Unga Tribal Council is taking the following positions on the below listed proposals.

- Opposing the following Proposals: 106, 109, 119, 120, 126, 128, 133-143, and 148 – 150.

- Supporting proposals: 107,108, 110, 112, 115, 116, 130, 131, 144-146, and 152.

No other area within the State of Alaska has witnessed or been constantly under attack from others. Whenever fish are missing from AYK, Bristol Bay and the Chignik Area automatically we Eastern Aleuts are to blame for fishing in Area M. This energy needs to stop; because it is unfair to us living here and will ultimately create severe hardships on our people and communities.

All of us in the entire Alaska Peninsula communities of Sand Point, Nelson Lagoon, Cold Bay, Akutan, False Pass and King Cove are culturally dependent on salmon fishing. Subsistence is part of the fishery.

Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economics of these communities including ours die without salmon.

The current issues of the AYK Arctic Yukon Kuskokwim crisis will not be solved by shutting down or severely reducing our indigenous fishermen's livelihoods in order to ensure the survival of other fisheries. Our fishermen have been faced with adverse obstacles that have been put forth upon them and no other area within the State of Alaska has been constantly under attack from others whenever fish are missing with blame being put on us for conservation problems.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food –not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential impact, small as it may be, on AYK chums.

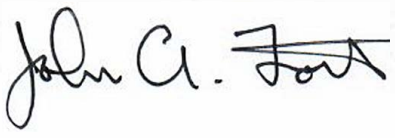
Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, and 6.9% in 2007, 2008 and 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.3%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum salmon were rearing in the ocean are a major reason for adult declines to AYK river's in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Several factors are playing a role in the salmon fishery, circumstances that should not be utilized in putting the blame on other fishery areas, such as Area M. Our fishery is small in nature has been in existence since time immemorial it is not just the economies of our fishery but a vital part of our history.

Real lives are at stake here and closures or reduced fishing times will do lasting damage to our indigenous people, our local fishermen, our communities, our infrastructure all who are dependent upon this historic salmon fishery each and every year. Please take a careful look at the whole picture and maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,
John A Foster
President



Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

UNITED FISHERMEN OF ALASKA

Mailing Address: P.O. Box 20229, Juneau AK 99802-0229
Phone: (907) 586-2820
E-mail: ufa@ufa-fish.org **Website:** www.ufa-fish.org

Alaska Board of Fisheries
Board Support Section
ATTN: BOF Comments
PO Box 115526
Juneau, AK 99811-5526

Re: ADF&G Management Plans for Alaska Peninsula Salmon Fisheries

Dear Chairwoman Carlson-Van Dort,

United Fishermen of Alaska (UFA) is the largest statewide commercial fishing trade association, representing 37 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. UFA supports access by the public to Alaskan's seafood resources through commercial fisheries.

UFA supports science-based management and sustainably managed fisheries in conjunction with our long-standing policy supporting mixed stock management. Fishermen depend on ADF&G data analysis, sound management, and the best available science for healthy and sustainable fisheries in the state, including Area M seine, drift and setnet fisheries. Currently the WASSIP studies of 2007-2009 are the best data we have for understanding harvest rates in Area M fisheries on the Coastal Western Alaska (CWAK) genetic stock group, which include chum stocks from Bristol Bay to Norton Sound, some 800 miles of coastline and their river systems. In 2022, the department initiated a new WASSIP type study in the Area M fisheries.

Based on the WASSIP studies, harvest rates of CWAK stocks in the Area M June fisheries varied ranged from 2.1% to 6.9% for the study years 2007-2009. These harvest rates include chum going to Bristol Bay and Norton Sound, not just the Yukon and Kuskokwim River systems. More recently, ADF&G, NOAA, and International Year of the Salmon (IYS) fisheries data suggest early marine conditions and poor ocean survival during the second and third year of ocean life are linked to poor AYK chum productivity.

In conclusion, we would like to reiterate that UFA strongly supports fishery management plans for the South Alaska Peninsula mixed stock fishery based on the best available science.

Regards,

Matt Alward
President

Tracy Welch
Executive Director

PC175

January 31, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. I've lived in King Cove my whole life and I fish for a living. Salmon fishing in the South Alaska Peninsula region is very important as I fish for a living. It's the only income coming in to provide for me and my family.

Sincerely,

Kianna Uttecht
knuttecht@outlook.com
(907) 299-4988

Submitted by: Joseph VonDoloski

PC176

Community of Residence: Sand Point

Comment: As a business owner and as the Principal of the public school here in Sand Point, having moved here to raise my large family, I am writing in response to the fishing proposals listed below, some of which will negatively affect southwest Alaska and have a detrimental impact on the local economy and way of life for the our community.

We all know Fishing is a vital industry for the communities in this region, providing jobs and income for families and businesses. Yet some of these proposals will arbitrarily sever fishing opportunities, and decimate livelihoods for many people.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

I heartily oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.

I fully support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods and it will not solve the problem it proposes to.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries. Are we really considering killing 6 communities in SW Alaska?

Salmon declines are complex, and we are all serious about accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

We teach our students at a very early age, "If everyone is not having fun, it's not fun."

Thank you for your consideration.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC177

Submitted by: Jack Walsh

Community of Residence: Sand Point. AK

Comment: I am writing to voice my opposition to proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150. As the superintendent of the Aleutians East Borough School District and an Alaska resident for 35 years I have become very aware of the importance of our Area M fisheries to the communities of Sand Point, King Cove, Akutan, False Pass, Cold Bay, and Nelson Lagoon. These fisheries have provided our families with the bountiful fish which is the life blood of our economy, our food supply, and livelihood for generations. Besides those important aspects of the fishery, there are a significant number of our residents and businesses that support the industry, provide the infrastructure and the necessary services to process and transport these resources, and bring the fish to the world market. The region has had both years of great catches that have been a tremendous boost, and other years that qualified as disasters because of the impact on such a large percentage of our residents and businesses. The ebb and flow of these fisheries is not unlike similar cycles effecting every part of our state's fishing industry.

Our school district has seen dramatic changes, since I first came to this district in 1987. The numbers of students and communities served by the district continues to trend downward and a large part of that is related to employment opportunities for families and the high costs for goods and services in the region. As an area that has a large number of boats and permits owned by year round residents, and family businesses that support generations of family and community members, our fishery continues to be well managed and committed to actions that have helped sustain the fishery. We believe that this discipline and commitment has helped this area and other fisheries throughout the state stay strong and be a viable part of the overall fisheries management plan within the state.

Our Borough continues to see the fishing industry as our primary source of revenue through the fish tax, and that revenue stream is a large part of the ways that our district is supported. Whether it contributes to the local requirement of the foundation formula, to be used for our share of any capital projects and maintenance of our facilities, or it helps provide indirect support through the villages and cities where are schools exist and the unkind contributions each makes to our schools, our Area M fishery continues to be as necessary as ever. I hope that as the Board reviews their management plan and prepares for future decisions they fully consider the impact those decisions might have.

In most of my message the goal was to identify the commercial fishing industry, but our fisheries also provide tremendous sport and recreational opportunities, meet our subsistence needs and lifestyle, and will continue to sustain the people of the region for generations to come. As it has always been.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose	**Proposal 128:** Oppose	**Proposal 137:** Oppose	**Proposal 142:** Oppose
Proposal 109: Oppose	**Proposal 133:** Oppose	**Proposal 138:** Oppose	**Proposal 143:** Oppose
Proposal 119: Oppose	**Proposal 134:** Oppose	**Proposal 139:** Oppose	**Proposal 148:** Oppose
Proposal 120: Oppose	**Proposal 135:** Oppose	**Proposal 140:** Oppose	**Proposal 149:** Oppose
Proposal 126: Oppose	**Proposal 136:** Oppose	**Proposal 141:** Oppose	**Proposal 150:** Oppose

PC178

Submitted by: Jeffrey Wasley

Community of Residence: Cold Bay

Comment: I am writing in opposition of fisheries proposal 103

The proposal as written changes the possession limits for both Coho and Sockeye salmon in all the freshwater creeks and Cold Bay Saltwater areas.

The proposal was based off of similar regulations for areas of Kodiak and Dutch Harbor. Both of those areas have populations of roughly 4000-5000 plus residents while Cold Bay has roughly 50-60 residents. The Cold Bay area has 4 creeks or rivers that can be accessed by road vehicles that all have strong runs of Coho Salmon. Recent fisheries surveys have shown a decline in one of the major sockeye systems, but an increase in other sockeye systems that are utilized by both sport and subsistence users.

The latest AK Dept. of Fish and Game salmon survey from this past fall (2022) showed a higher count of Coho then the long term average for Russell Creek. Russell Creek is the most popular of the 4 local Silver Salmon Fisheries and has shown no signs of smaller runs of Coho Salmon. Furthermore, the other creeks have shown no signs of smaller Coho runs either and most get fished very, very lightly by Alaskan standards.

Cold Bay has few businesses outside of Airport related activities and Guided hunting and Guided fishing. These unnecessary lowered limits if enacted would have a large negative impact on the 6-7 local businesses that cater to those willing to come out and fish with us.

There are also many resident anglers that do not use guides, but fish on their own and catch coho salmon to feed themselves and their families.

This unnecessary lowering of the salmon limits would harm local businesses of Cold Bay, non resident tourism and Alaskan families who want to put fish in the freezer. If the science and management was their showing that our Coho's were declining, we would want to protect the resource and have lower limits. That simply is not true, we have strong Coho runs in multiple rivers and creeks that show no signs of being overfished.

We understand that the Sockeye Salmon are not doing nearly as well in the area as the Coho Salmon are. The Mortensen Sockeye fishery has crashed since 2017. The Swan Lake Sockeye have remained strong, but more fishing pressure, in particular, increased subsistence fishing.

We would like to Compromise and leave the Coho limit as it currently is but change the Sockeye limit to 3 daily in the Cold Bay area fisheries.

We understand the importance of the Sockeye subsistence fishery to the locals of Cold Bay area and always want our friends and neighbors to have that excellent local food source available to feed them and their families. We believe a compromise is at the best interest to everyone involved.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 103: Oppose

January 22, 2023

PC179

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries. I've lived in Sand Point for 30 years and salmon fishing is why I can afford to continue to live here. Salmon fishing in the South Alaska Peninsula region is very important because it is my livelihood.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

James Webster
jamowebster5469@gmail.com (907) 383-8382

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Support

PC180

Western Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: 907-786-3888 Fax: 1-907-786-3898
Toll Free: 1-800-478-1456

In Reply Refer to
OSM.22145.WI.NP

DEC 30 2022

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o Alaska Department of Fish and Game
Boards Support Section
1255 West 8th Street
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

During the Western Interior Alaska Subsistence Regional Advisory Council's (Council) fall 2022 public meeting held on October 19-20, the Council developed the following positions and comments on Proposals 79, 91, and 140 that will be taken up by the Alaska Board of Fisheries (BOF) at upcoming BOF meetings.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Western Interior Alaska Region. The Councils were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

Arctic Yukon Kuskokwim Finfish BOF meeting comments

Proposal 79

Allow hook and line attached to a rod or pole when subsistence fishing upstream of the Nulato River mouth, to and including the Koyukuk River drainage up to the closed waters of the Koyukuk and the subsistence permit area.

The Council **supports Proposal 79**. The Council supports the ability of subsistence users to be able to harvest subsistence foods using readily available gear types.

PC180

Proposal 91

Modify Kuskokwim Area lawful gear and gear specifications and operations to provide greater opportunity to harvest salmon other than king salmon during times of salmon conservation.

The Council **supports Proposal 91**. During the unprecedented collapse of the Coho Salmon run during the 2022 season, subsistence users on the Kuskokwim River were unable to fish with any gear type during a complete closure instituted by the Alaska Department of Fish and Game (ADF&G). This closure was instituted after the salmon were already instream after the run strength was determined to be too weak for continued subsistence fishing opportunities. While this closure was to protect Coho Salmon, the lack of flexibility in current state regulations made it so that no gear types were allowed to target other healthy stocks of fish, leaving the entire river unable to subsistence fish for any species. Prior to the Coho Salmon collapse, severely depressed returns of Chinook and Chum salmon resulted in very limited subsistence opportunity. The inability for subsistence users to be able to deploy whitefish nets in the fall to supplement their diets with fresh fish or put up non-salmonid fish for the winter resulted in severe food insecurity for subsistence users. The Council fully supports giving ADF&G Kuskokwim River fisheries managers more options to allow selective harvest of other fish during times of any salmon species conservation.

Alaska Peninsula/Aleutian Island/Chignik Finfish BOF meeting comments

Proposal 140

Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time.

The Council **supports Proposal 140**. The Continued severe in-river subsistence restrictions and closures for multiple salmon species in both the Yukon and
Kuskokwim rivers drainages, the failure of multiple salmon species to meet escapement goals in many tributaries in both drainages are of great concern. Genetics testing done on salmon caught in South Alaska commercial fishery demonstrate that a portion of the salmon harvested in this fishery are of Yukon or Kuskokwim origin. The State's constitution mandates sustained yield fishery management for all salmon stocks, with a statutory subsistence allocation priority over commercial harvest. Large by-catch of Chum salmon in the mixed stock South Peninsula commercial needs to be addressed. The current management plan is not working to adequately protect future salmon runs in the suppressed drainages stocks of origin, and should be changed to curtail the interception of Yukon and Kuskokwim bound salmon stocks.

The Council shares this letter with the BOF and the Federal Subsistence Board, emphasizing these issues are of vital importance to the subsistence needs of the people of Western Interior Alaska. Thank you for your consideration of our positions and comments. Any questions regarding this letter can be addressed directly to me or through our Subsistence Council Coordinator Nissa Pilcher at (907) 455-8147 or nissa_batespilcher@fws.gov.

PC180

Sincerely,

Jack L. Reakoff
Chair, Regional Advisory Council
Yukon-Kuskokwim Region

cc: Federal Subsistence Board
Office of Subsistence Management
Interagency Staff Committee
Western Interior Alaska Subsistence Regional Advisory Council
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record

PC181

Submitted by: Andrea Whitson

Community of Residence: Sand Point

Comment: Proposal 133: Opposed

In the "What is the issue you would like the board to address and why?" explanation for proposal 133, the sponsors are playing a dangerous game that endangers their own livelihood as well as that of those who fish in Area M.

A global climate crisis is no time to use misleading language and carefully cherry-picked statistics to pit the public against any particular group of fishers. This year, the public– even some on my own island– are being manipulated into thinking that the fishers of Area M are rejecting conservation in favor of lining their pockets. When this slander takes hold in the public mindset, it will not respect the boundaries of Area M. Next year, the fishers of Chignik may find themselves cast in the same light.

The authors of this proposal ignore the heroic efforts of the seining fleet in Area M last year to self-regulate and stand down in the hopes of supporting the possibility of a AYK and Chignik rebound. As a centuries-old fishery, we in Area M recognize that the salmon must spawn if any of us are going to eat next year. We took conservation for the sake of our neighbor, for the sake of the salmon, and for the sake of our own survival very seriously and acted ahead of any requirements to do so.

In repayment for those efforts, the current proposal uses careful language such as "In 2004 the BOF increased fishing time in the Shumagin Islands to 544 hours in June, … That's an increase in fishing time of 101%, with the seiners reaping almost all of the benefit…"

In fact, the number of hours was never 544. The maximum was only ever 352 hours.

To the outside world, it sounds as if the 2004 move was an irresponsible increase. In reality, it was in response to two critical facts: (1) The 2001-2003 regulations almost bankrupted the area– smaller family operations lost everything, leaving the area vulnerable to larger, outside interests who have better access to cash reserves. And, (2) THESE RESTRICTIONS PROVED INEFFECTIVE as a means to improve the Chignik situation.

Instead of working with us as we worked with them, this short-sighted proposal sets Chignik against Area M and Area M against the world.

We know that the issue for the salmon is their oceanic feeding ground. We need to act together to educate the world that we feed about the real issues that the salmon are facing. This proposal will destroy the livelihood of family owned-boats– which will be replaced by non-Alaskan boats in the following years– and all for a strategy that failed to benefit the salmon population when employed from 2001 to 2003.

There is still time for us to work together. Divided, traditional fishers will not stand.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 133: Oppose

PC182

January 29, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial fisheries. Salmon fishing in the South Alaska Peninsula region is important; I support my family and others from fishing.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

David Wilson Sr
returnone@aol.com
(206) 719-0532

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC183

January 30, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. I grew up in King Cove, so culturally I grew up in the fishing industry. Fishing runs deep in my family. Currently, my father, my husband, and my father-in-law all fish salmon in Area M, so soon my children will step in and run our family boats. This isn't just a job to us. It's generational. It's cultural. It's our future. The salmon boats employ locals and contribute fish tax that directly funds our city, Borough, and schools—schools that my children attend and I teach at. Our community has to constantly defend our fisherman and our livelihood against claims that are deemed false by scientific evidence. We need help. Salmon fishing in the South Alaska Peninsula region is very important. Without this, our economy would crumble. Our school would face closure! Our community would die.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

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Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Arlene Wilson
arlenewilson05@hotmail.com
(907) 764-1091

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Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC184

January 30, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial, subsistence, and sport fisheries. I've fished my whole life; my family has been living in the area since they lived in holes in the ground. Salmon fishing in the South Alaska Peninsula region is very important. We depend on salmon fishing—it's a how I support my family.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Justin Wilson
justinwilson04@hotmail.com
(907) 306-9298

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC185

February 3, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is our way of life; the majority of our community are commercial fishermen.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Courtney Wilson
courtney_kim10@hotmail.com
(907) 903-4900

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC186

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in King Cove, Alaska and I participate in commercial, subsistence, sport, and personal use fisheries. Salmon fishing in the South Alaska Peninsula region is important because for most people, it's the only source of income to pay bills.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

The entire Alaska Peninsula community – King Cove, Sand Point, Cold Bay, Akutan, False Pass, and Nelson Lagoon – are culturally dependent on salmon fishing. Subsistence is part of the fishery. Almost everyone in these communities fishes commercially or works in a support industry for fishing. The economies of these six communities die without salmon fisheries.

Recent NOAA and ADF&G research strongly suggests poor marine smolt survival is likely linked to changing oceanic conditions and lack of available food–not the South Alaska Peninsula Salmon Fishery. Even so, fishermen took voluntary actions last season to minimize potential for impact, small as it may be, on AYK chums.

Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

According to NOAA, extreme warm ocean temperatures during the years 2016 – 2019 when juvenile AYK chum were rearing in the ocean are a major reason for adult declines to AYK rivers in 2020 and 2021. Warm ocean waters resulted in poor prey density as well as poor prey quality (low fat content), which contributes to poor growth and survival.

Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Oscar Wilson Jr.
dclajr@hotmail.com
(907) 497-7140

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC187

Submitted by: Jamie Wurtz

Community of Residence: Bellingham, Washington

Comment: I strongly oppose the proposals;

133,134,135,136,137,138,139,140,141,142,143,147,148,149,150

While there have been difficult and downright devastating returns of salmon across the state of Alaska during the last few years now is an important time to double down on the research and funding needed to fully understand the complexities of wild salmon returns. Instead of pointing fingers at other fishermen and members of other fishing communities its now more important than ever for all of us to come together to help understand the true root of the problems that are affecting certain fisheries with poor returns and other similar and nearby fisheries with enormous and state record breaking returns.

As a captain of a small seine boat fishing in the Area M salmon fishery I implore you to help provide assistance to devastated fishing communities in the state of Alaska but not at the fate of other Alaskan communities that are so far making by. I have been fishing since I was 16 years old (20 years now) and while that is not as long as many fishermen in this state, I have experienced a fair number of poor seasons, unexpected declines in fish stocks, rock bottom prices, no fishing time, closed fisheries. It is part of the cycles that define how wild fish stocks behave. I would not want to bankrupt another fishermen in a different area just so that we can suffer together with no expectation that I myself will have a recovery.

The best available data we have at this time does not indicate that even a 100% closed area M fishery will have any discernable difference in the AYK or Chignik systems. Are we willing to condemn the 6 communities on the Alaska Peninsula to an economic death without fully understanding what it is that has been hurting the stocks in the AYK and Chignik regions?

Please do what is best for the state of Alaska and the people of every community that encompasses.

Thank you for your time.

Jamie and Mia Wurtz

F/V Paragon

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Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 147: Oppose
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC188

February 3, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Anchorage, Alaska and I participate in commercial, subsistence, and sport fisheries. Salmon fishing in the South Alaska Peninsula region is very important, both for the ability for many family members to earn a livelihood and to provide subsistence use for my family.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

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Salmon declines are complex, and we maintain a commitment to an accurate representation of data and science. ADF&G reports that South Alaska Peninsula June harvest rates were 2.1%, 3.6%, & 6.9% in 2007, 2008, & 2009 respectively, for the entire CWAK group which extends from Bristol Bay to Norton Sound. This is an average harvest rate of 4.2%, a tenth of the (factually inaccurate) percentages cited by those seeking to shut down the fishery.

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Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Viola Yatchmeneff
viola.yatchmeneff@ahaak.org
(907) 244-6230

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

PC189

February 6, 2023

Board of Fisheries
Alaska Dept. of Fish and Game P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Alaska Peninsula/Aleutian Island/Chignik Finfish Board of Fisheries meeting taking place in Anchorage, Alaska and wish to submit this public comment of support for the fishermen and fisheries of the South Alaska Peninsula region.

I live in Sand Point, Alaska and I participate in commercial and subsistence fisheries. Salmon fishing in the South Alaska Peninsula region is very important. Commercial salmon fishing is my livelihood.

I wish to extend my support on the record for the fishermen and fisheries of the South Alaska Peninsula region. I urge you to maintain the status quo for the current ADFG Alaska Peninsula management plan.

- Please oppose the following proposals: 106, 109, 119, 120, 126, 128, 133 – 143, & 148 – 150.
- Please support the following proposals: 107, 108, 110, 112, 115, 116, 130, 131, 144 – 146, & 152.

Alaskans have participated in the South Alaska Peninsula Salmon Fishery for generations. But recently, poor salmon runs have pitted communities against each other, with some claiming that the South Alaska Peninsula Salmon Fishery must be shut down or severely reduced to ensure the survival of other fisheries. However, the science doesn't support this plan of action, and if fisheries close, thousands of Alaskans will lose their livelihoods for no benefit.

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Thank you for your consideration. Please maintain the status quo for the current ADFG Alaska Peninsula management plan by opposing the previously-mentioned proposals and support the fishermen and fisheries of the South Alaska Peninsula region at the upcoming Board of Fisheries meeting in Anchorage.

Sincerely,

Chris Yatchmeneff
cjyatchmeneff@hotmail.com
(907) 386-6242

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 106: Oppose
Proposal 107: Support
Proposal 108: Support
Proposal 109: Oppose
Proposal 110: Support
Proposal 112: Support
Proposal 115: Support
Proposal 116: Support
Proposal 119: Oppose
Proposal 120: Oppose
Proposal 126: Oppose
Proposal 128: Oppose
Proposal 130: Support
Proposal 131: Support
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Oppose
Proposal 138: Oppose
Proposal 139: Oppose
Proposal 140: Oppose
Proposal 141: Oppose
Proposal 142: Oppose
Proposal 143: Oppose
Proposal 144: Support
Proposal 145: Support
Proposal 146: Support
Proposal 148: Oppose
Proposal 149: Oppose
Proposal 150: Oppose
Proposal 152: Support

ALASKA BOARD OF FISHERIES
Alaska Peninsula/Aleutian Island/Chignik Finfish Meeting

ANCHORAGE, AK

SELECT PROPOSAL SYNOPSIS, COMMENTS AND RECOMMENDATION

SUBMITTED BY

YUKON DELTA FISHERIES DEVELOPMENT ASSOCIATION (YDFDA)

FEBRUARY 6, 2023

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 134: Support
Proposal 135: Oppose
Proposal 136: Oppose
Proposal 137: Support
Proposal 138: Support With Amendments
Proposal 139: Support
Proposal 140: Support With Amendments
Proposal 141: Oppose
Proposal 148: Support With Amendments
Proposal 149: Support With Amendments

Alaska Peninsula/Aleutian Island/Chignik Finfish —

View PDF of all proposals for Alaska Peninsula/Aleutian Island/Chignik Finfish|

South Alaska Peninsula Salmon June Management Plan

- View PDF of all proposals for South Alaska Peninsula Salmon June Management Plan|
  - Proposal 133 (*PDF 133 kB*) NOT INCLUDED
  - Proposal 134 (*PDF 119 kB*)
  - Proposal 135 (*PDF 122 kB*) NOT INCLUDED
  - Proposal 136 (*PDF 137 kB*)
  - Proposal 137 (*PDF 133 kB*)
  - Proposal 138 (*PDF 135 kB*)
  - Proposal 139 (*PDF 125 kB*)
  - Proposal 140 (*PDF 131 kB*)
  - Proposal 141 (*PDF 114 kB*)
  - Proposal 142 (*PDF 113 kB*)

South Alaska Peninsula Salmon Management

- All proposals for South Alaska Peninsula Salmon Management (PDF 139 kB)
  - Proposal 148 (PDF 105 kB)
  - Proposal 149 (*PD*

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South Alaska Peninsula Salmon June Management Plan

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All proposals for South Alaska Peninsula Salmon June Management Plan (*PDF 227 kB*)

Selected Proposals: 133, 134, 136, 137, 138, 139, 140,141

Proposal 133

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

PROPOSED BY: Timothy Murphy

Purpose: Amends fishing time in the Shumagin Islands for purse seine gear to 72-hour openings interspersed with 72-hour closures. Removes the Volcano Bay Section and the East and West Pavlof Bay Sections from the June Management Plan. Removes the regulations pertaining to the "Dolgoi Islands area" harvest limit of 191,000 sockeye salmon from the June management plan.

What would be the effect if this proposal were adopted? ***ADF&G:*** *Less fishing time and area depending on gear type. The area open to fishing would be reduced for set gillnet and drift gillnet gear. Area open to commercial salmon fishing by seine gear would remain unchanged. The number of hours open to fishing for seine gear in the Shumagin Islands Section of the Southeastern District would be reduced from 352f hours to 216 hours (Figure 133-1). Commercial salmon fishing hours allowed for drift gillnet and set gillnet gear would remain unchanged. Removing the "Dolgoi Island area" regulations would have little impact on harvest since very little harvest effort occurs there. Reducing fishing time in the Shumagin Islands Section of the Southeastern District for purse seine gear would likely result in seine effort shifting into the South Unimak fishery where commercial fishing would remain open (ADF&G 2023)*

Rationale by Proponent:

- The Chignik sockeye fishery is struggling, with the early run not able to achieve escapement in 2018, 2019, 2020, and 2021, and the late run unable to make escapement in 2018 and 2020.
- In 2004 the BOF increased fishing time in the Shumagin Islands to 544 hours in June, up from the historical average of 270 hours the previous 30 years. That's an increase in fishing time of 101%, with the seiners reaping almost all of the benefit.
- From 2004 to 2018 there were actually 544 hours of continuous fishing time in the Shumagin Islands.
- In 2019 the BOF made a small adjustment that instituted short, 32-hour closures in the fishery. But 32 hours is not enough time for Chignik-bound sockeye to traverse the area.
- In it's 2004 action, the BOF also opened up an entirely new June month interception fishery in the Volcano Bay Section of the Southwestern District and the East and West Pavlof Bay Sections of the South Central District.

- These areas are well-known and documented heavy interception areas for Chignik-bound sockeye, as well as other east-bound sockeye.

ADF&G RECOMMENDATION: NEUTRAL (allocative)
The department is NEUTRAL on this allocative proposal.

YDFDA RECOMMENDATION: SUPPORT THE INTENT/OPPOSE:
YDDFDA supports reducing fishing time but YDFDA believes that this proposal does not reduce fishing time sufficiently to benefit AYK salmon stocks. YDFDA believes that Proposal 140 that reduces fishing time for all gear types and reduces the fishing area more than Proposal 133 deserves support from not only AYK stakeholders but from Chignik stockholders also. Repeal of the South Unimak and Shumagin Island Management Plan benefits all stakeholders, except the fishers of this mixed-stock, intercept fishery. Accordingly, YDFDA supports Proposal 140 over Proposal 133. WASSIP results comparing Bristol Bay Sockeye salmon, Chignik Sockeye salmon and CWAK Chum salmon harvest contributions to the South Alaska Peninsula fisheries are presented in Figure 133-2. Chignik Sockeye salmon stock accounted for an average of 8.1% of the Sumaghin Island fishery harvest, while Chignik Sockeye salmon accounted for a similar average of 9.3% of the South Unimak harvest for the years, 2006-2008 (Munro et al. 2012).

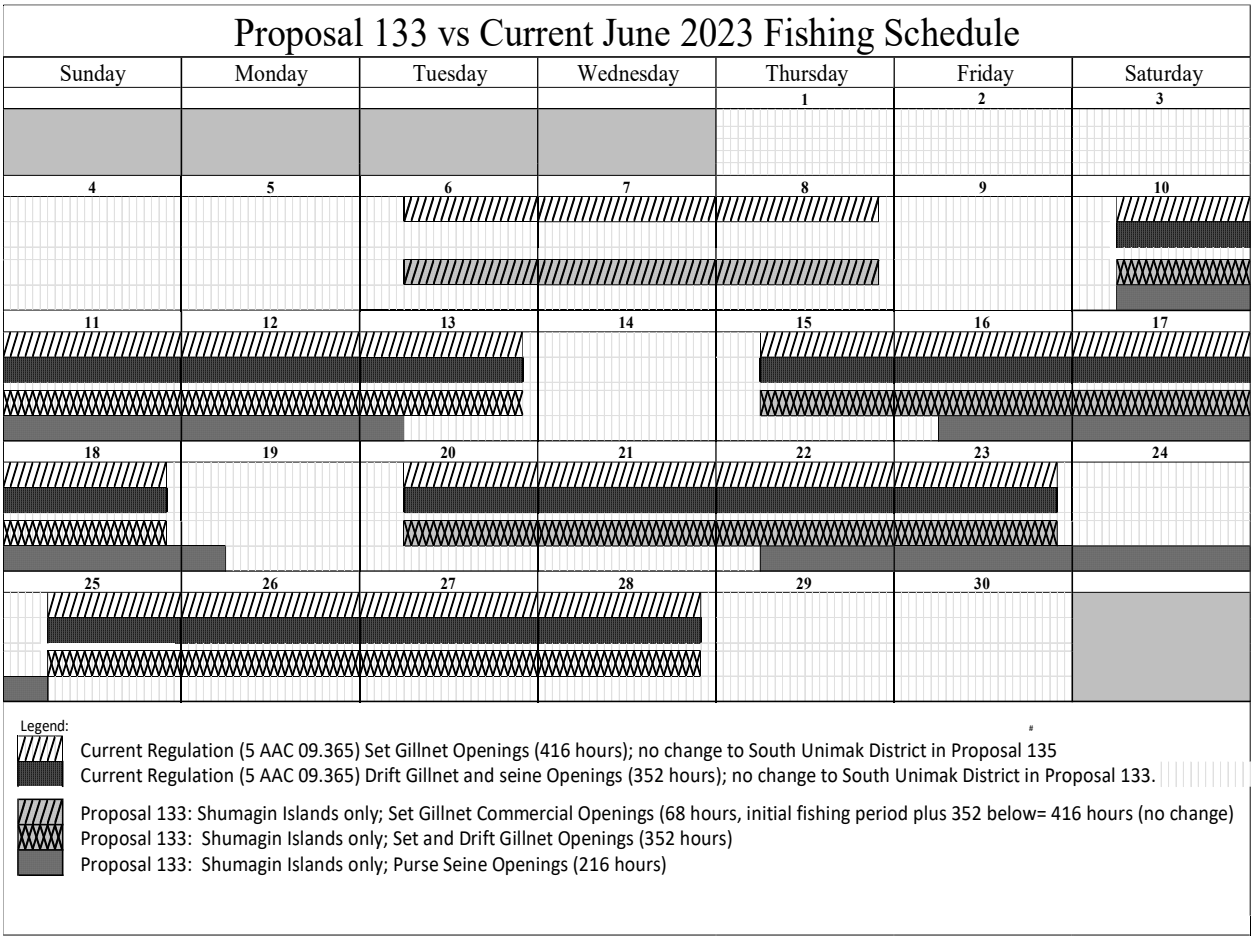

Figure 133-1. Proposal 133 proposed fishing schedule vs current June 2023 fishing schedule, South Alaska Peninsula June fishery.

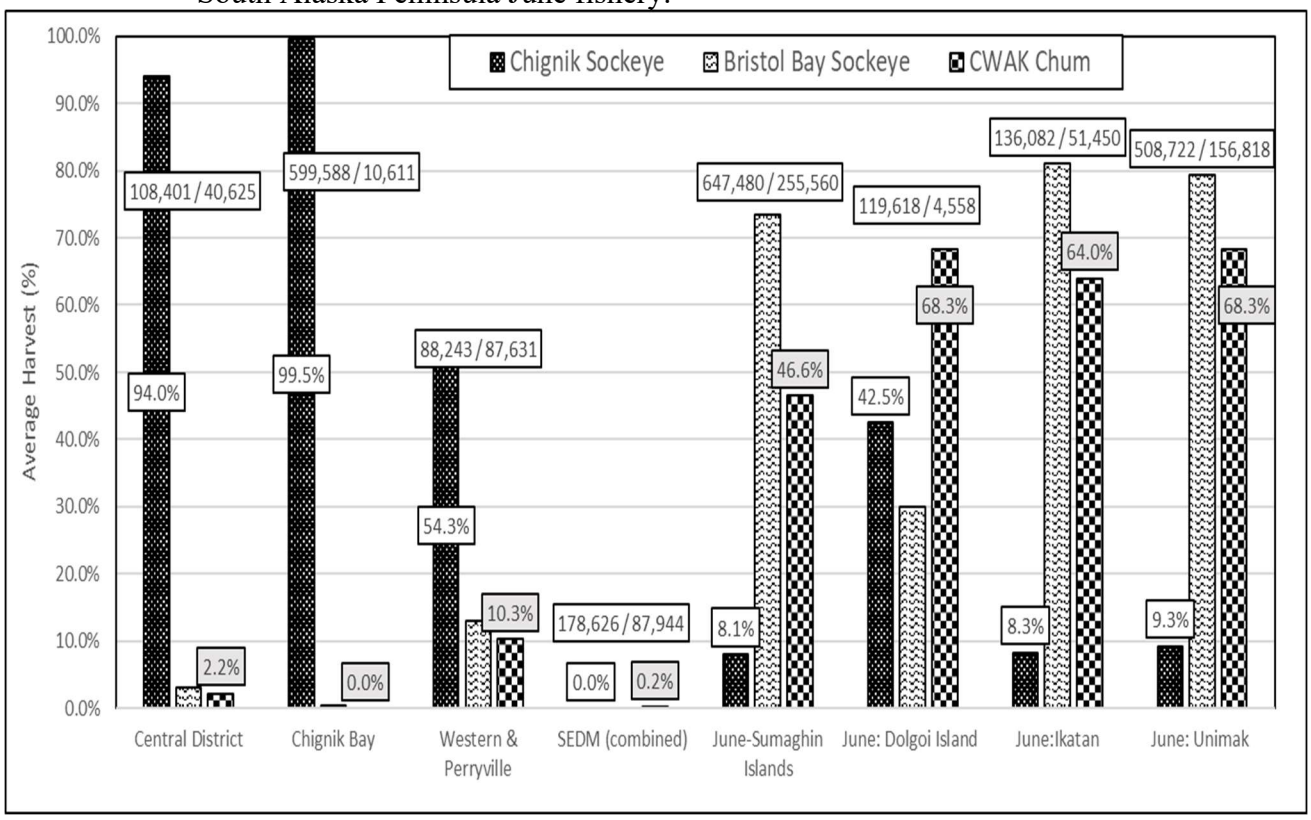

Figure 133-2. Average harvest contributions (proportions) of Chignik Sockeye, Bristol Bay Sockeye and CWAK Chum salmon to specific South Alaska Peninsula fisheries, 2006-2009. Numbers above bars indicate the Sockeye / Chum salmon average harvest. Nunbers within and above the bars indicate harvest proportion for Chignik Sockeye salmon and the CWAK Chum salmon. Data compiled from Habitch et al. 2012 for Sockeye and Munro et al. 2012 for Chum salmon.

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Proposal 134

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

PROPOSED BY: Kuskokwim River Inter-Tribal Fish Commission

Purpose: Repeal 5 AAC 09.365 and replace with the previous management plan adopted by the board approximately 20 years ago but edited to incorporate king salmon and coho salmon in addition to chum and sockeye salmon. Specific regulatory language was not provided in the proposal.

What would be the effect if this proposal were adopted? ***ADF&G:*** *Reduce fishing time in the South Alaska Peninsula. The intent of the proposal is to reduce or close fishing in the South Alaska Peninsula in order to conserve AYK (AYK) salmon stocks. The effects are unknown until a clear understanding of what regulatory management plan would be in place if this proposal were to pass. (ADF&G 2023).*

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Rationale by Proponent:

- The current South Unimak and Shumagin Islands June Salmon Management Plan no longer includes some commercial fisheries in Area M that also intercept significant numbers of AYK bound salmon during their movements back to the Bering Sea and AYK rivers, including Area M cape fisheries.
- These additional areas need to be incorporated into a new management plan that guides Area M commercial fisheries and ensures only sustainable interceptions of AYK-bound salmon stocks in excess of AYK escapement needs, priority AYK subsistence needs, and historical harvest levels by AYK sport and AYK commercial fisheries to ensure healthy and sustainable AYK salmon and AYK communities.
- Old WASSIP data may be the only best available information currently available and should be used to inform mitigation actions until such time that newly developed genetic markers are incorporated into more relevant mixed stock analyses.
- Waiting for action until the ADF&G reinitiates these assessments is unacceptable.
- Otherwise, commercial salmon harvests throughout Area M south of the Alaska Peninsula where AYK salmon have historically been intercepted should be eliminated entirely.

What is the issue you would like the board to address and why?

- The lack of proactive and precautionary management actions to conserve and meet the escapement goals of AYK chum salmon stocks in Alaska Peninsula Management Area M commercial fisheries in 2020 and 2021 is problematic and unsustainable.
- The failure of ADF&G to continue genetic mixed stock analysis and assessments of Area M commercial fisheries' interception of Chinook salmon, chum salmon, and coho salmon bound for AYK spawning rivers and tributaries for more than a decade is problematic and unsustainable.
- The Board addressed these concerns previously two decades ago;
- however, those interception mitigation measures have since been repealed or relaxed to such an extent that the June commercial fisheries in the South Unimak and Shumagin Islands sections, and other sections of Area M, which intercept AYK-bound salmon stocks must be closed or restricted to ensure that commercial interception does not compromise sustainable management principles, mixed stock fishery policies, and meeting escapement goals of AYK Chinook, chum, and other salmon stocks.

ADF&G RECOMMENDATION: NEUTRAL (allocative)
Proposal is allocative. No regulatory language is provided in the proposal.

YDFDA RECOMMENDATION: SUPPORT THE INTENT:
The author seeks to the current South Unimak and Shumagin Islands June Management plan and replace is with the management plan adopted by the Board in 2001 but also add AYK-bound king, Coho and Sockeye salmon to the plan. While YDFDA supports the intent of this proposal, YDFDA will support Proposal 140, which also seeks to repeal this management plan and replace it with included specific regulatory language which adds Chinook salmon to the plan but also proposes to reduce the area fished in the South Alaska Peninsula June fisheries.

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Proposal 135

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

PROPOSED BY: Ben and Raechel Allen

Purpose: Establish a sockeye salmon harvest percentage of 82% in the South Unimak portion of the South Unimak and Shumagin Islands June Salmon Management Plan and the remaining 18% in the Shumagin Islands Section. If harvest in the Shumagin Island Section of the Southeastern District reaches 18% of the total sockeye salmon harvest in the South Alaska Peninsula June fishery, the Shumagin Islands Section would close until fish ticket reports sockeye salmon harvest of less than 18% of the total sockeye salmon harvest

What would be the effect if this proposal were adopted? ***ADF&G:*** *Possibly reduce fishing time in the Shumagin Islands Section of the Southeastern District. If sockeye salmon harvest in the Shumagin Islands Section of the Southeastern District was greater than 18% of the total sockeye salmon harvest throughout the June fishery, the Shumagin Islands Section would close. Commercial salmon fishing would remain open in the South Unimak portion of the June fishery, shifting effort west and increasing gear conflicts in the existing South Unimak portion of the fishery (ADF&G 2023).*

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Rationale by Proponent:

- The South Unimak and Shumagin Island June Fishery has shifted, placing greater pressure on stocks in the Shumagins.
- In 1975 a sockeye GHL based on Bristol Bay forecast was implemented at 6.8% Unimak and 1.5% Shumagins. The percentages were based on historical catch data (1997 S. Pen AMR, p.2)
- This GHL remained in place until it was removed in 2001.
- While the annual amount of sockeye caught varied, the catch ratio between the areas remained at approximately 81.93% Unimak (June) to 18.07% Shumagins (June) for 26 years.
- In addition to the GHL, the two areas percentages were spread over four time segments to assure that fishing pressure was even more evenly distributed. This method of fishing while designed to allow a fishery based on Bristol Bay sockeye health, was also beneficial to alleviating pressure on Chignik sockeye transiting migratory pathways in the Shumagins.
- Proposed now is that the Shumagin catch would be regulated in such a way that it would approximate 18% of the combined June Unimak and Shumagin fishery catch.
- If during an opening, the daily reports show the total Shumagin sockeye catch to have exceeded 18%, the Shumagin fishery will close until the appropriate ratio is met and then it may be reopened.
- This assures the bulk of the sockeye catch focuses more heavily on Bristol Bay sockeye stocks which are presently quite healthy.
- If a time should arise when Bristol Bay should need protection, then the entire GHL (from 1975-2000) could be implemented and attached to the Bristol Bay forecast as it once was.

- The intent is to protect migratory pathways used by Chignik sockeye by returning the interception harvest effort to historical levels and distribution

ADF&G RECOMMENDATION: NEUTRAL (allocative)
The department is NEUTRAL on this allocative proposal.

YDFDA RECOMMENDATION: OPPOSE
YDFDA is opposed to this proposal because it would most likely increase the harvest contribution of the CWAK Chum salmon stock in the South Alaska Peninsula June fishery. The average harvest contribution of CWAK Chum Salmon to the June Shumagin Island fishery in 2007-2009 was 46.6%, 68.3% in the Unimak June fishery, and 64.0% in the Ikatan area fishery (Figure 135-1). Although not strictly comparable, the 2022 CWAK Chum salmon contribution to the Southeaster and South Central District, 13.4%, which contains the Shumagin Islands, was also less than the Unimak and Southwestern Districts, 19.7% (Dann et al. 2022), which includes the Unimak District, Ikatan Area, and the Dolgi Islands (Figure 135-1).

Although there is a higher average contribution of Bristol Bay salmon to the Unimak June fishery during the years, 2006-2008, 79.4%, than in the Shumagin June fisher, 73.5% (Figure 135-2), the proportion of Chignik Sockeye salmon in these fisheries is nearly the same, 9.3% and 8.1%, respectively. Note also that in two of the three years of the WASSIP study, 2006-2008, the Sockeye salmon harvest was higher in the June Shumagin fishery, 647,480, than the Unimak average total harvest, 508,722.

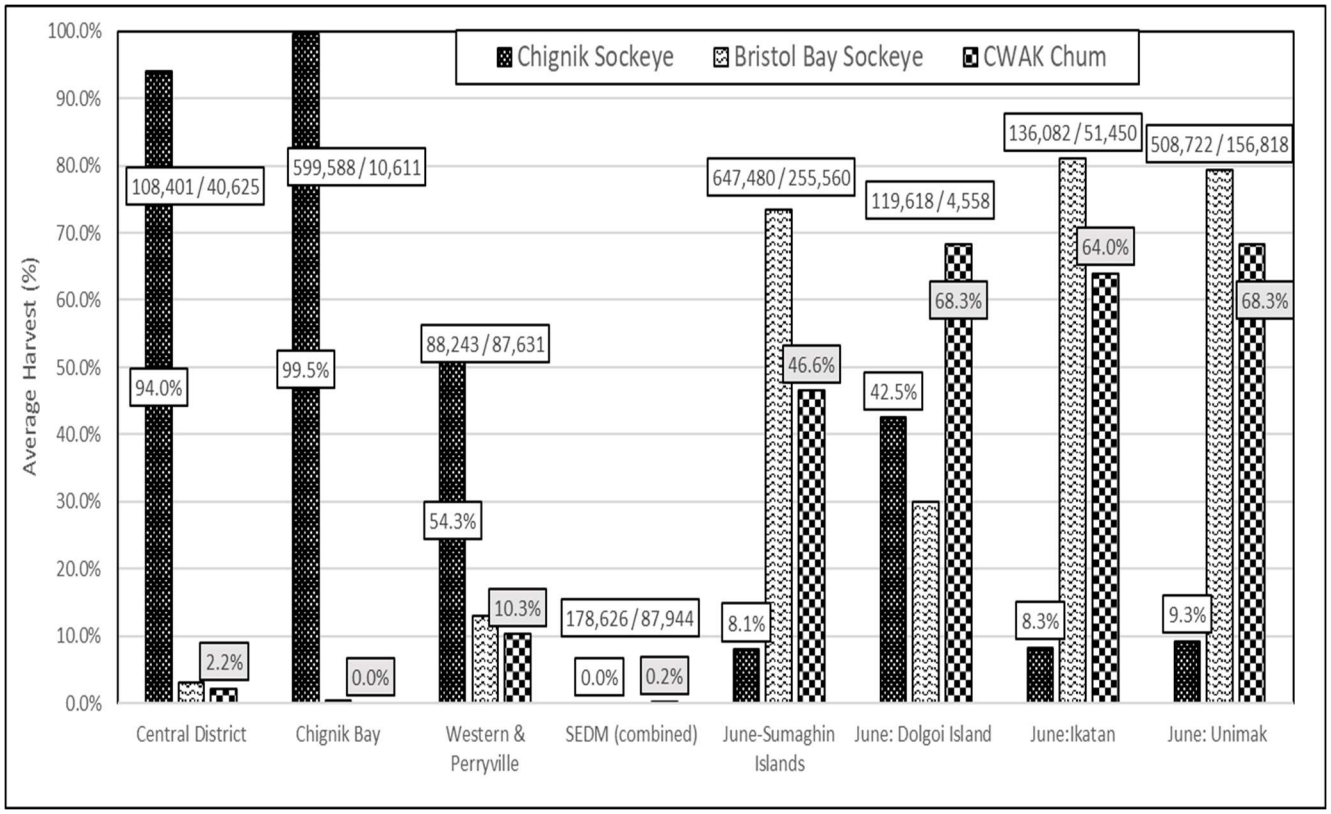

Figure 135-1. Average harvest proportion of Chignik Sockeye salmon, Bristol Bay Sockeye salmon (WASSIP: 2006-2008) and CWAK Chum salmon (WASSIP: 2007-2009) in the South Alaska Peninsula fisheries. Data compiled from Habicht et al. 2012 for Sockeye salmon and Munro et al. 2012 for Chum salmon. Numbers above bars are the total number of Sockeye / Chum salmon harvested in the sampled strata for that fishery. Proportions numbers within and above the Chignik Sockeye bar pertain to the proportion of Chignik Sockeye salmon in each fishery.

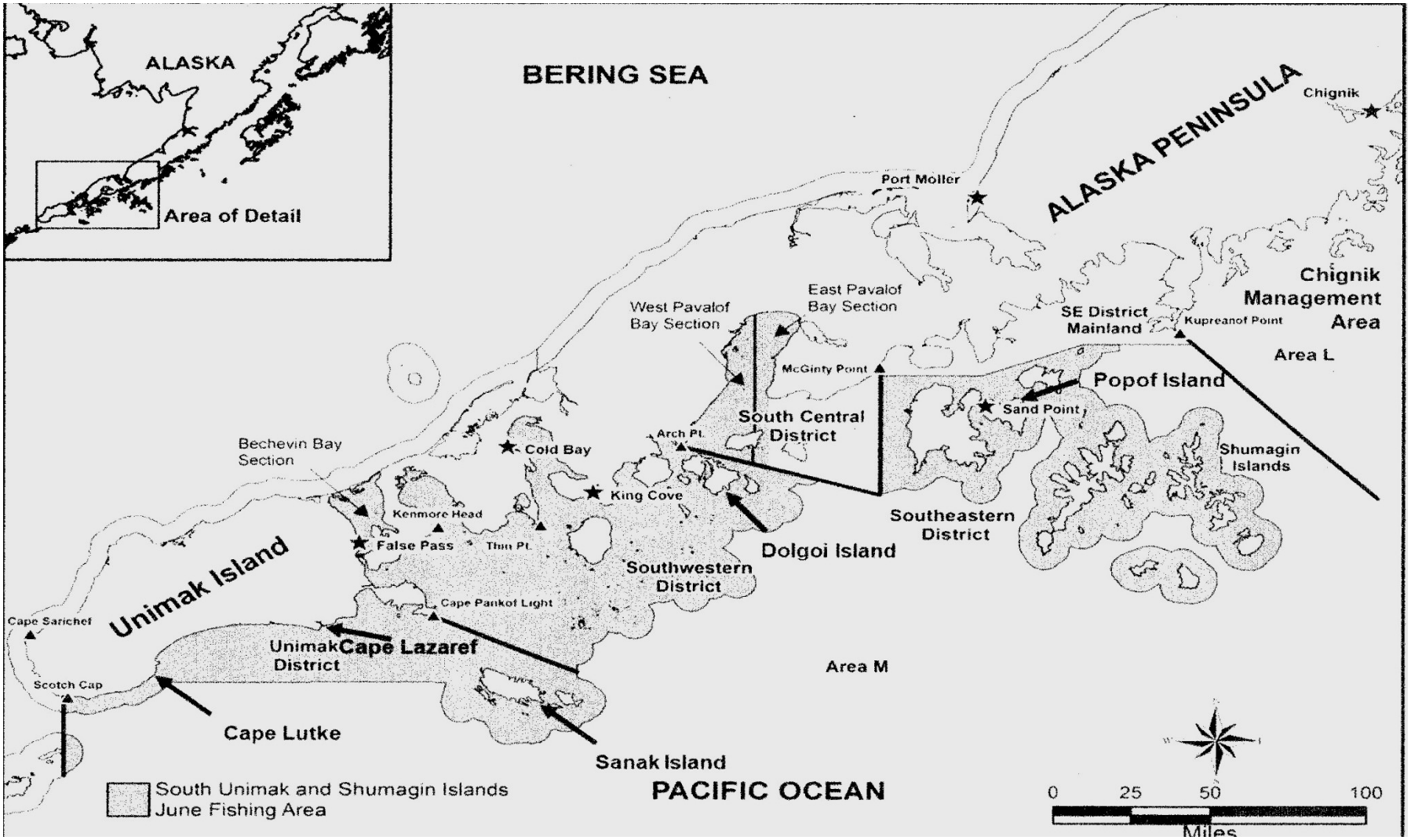

Figure 135-2. Map depicting the locations of the South Unimak and Shumagin Islands June fishing Areas, including specific locations, South Alaska Peninsula June Fisheries, 2022.

PC190

Proposal 136

PC190

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

Proposed by: Orutsararmiut Traditional Native Council

Purpose: Amend the South Unimak and Shumagin Islands June Salmon Management Plan to incorporate a harvest cap of 280,000 chum salmon of all origin during the June fisheries for all gear types and close the commercial fishery for the remainder of June once that cap is met.

What would be the effect if this proposal were adopted? *The South Unimak and Shumagin Islands June commercial salmon fishery would close when 280,000 chum salmon are harvested. In years when 280,000 chum salmon have been harvested in the past this would have resulted in a range of 17,539 to 888,604 fewer overall salmon harvested in the June fishery. It is unknown how fleet behavior and harvest patterns would change in response to a chum salmon harvest cap. In some years a cap may not reduce potential chum salmon harvest depending on salmon abundance and migration patterns. It is difficult to predict if a chum salmon harvest cap would result in greater returns of chum salmon to the Yukon and Kuskokwim Rivers (ADF&G 2023).*

Rationale by Proponent:

- ONC proposes that the Board of Fisheries amend the South Unimak and Shumagin Islands June Salmon Management Plan, 5 AAC 09.365, to incorporate a harvest cap of 280,000 chum salmon during the June fisheries using all gear types.
- All fisheries will close once the cap of 280,000 is reached.
- This request is consistent with historical records,
- Alaska Peninsula is one of six Fisheries on the migratory path of Coastal Western Alaska (CWA) chum salmon - Alaska Peninsula, Bristol Bay, AK Peninsula, Bristol Bay, Kuskokwim, Yukon, Norton Sound and Arctic. Therefore, based on preliminary estimates for CWA chum from 2021, the South Unimak and Shumagin Islands June should account for approximately one 6th of the chum salmon for the season.
- Currently, the management plan does not identify any harvest limits for chum salmon. Establishing a cap would ensure that migrating chum reach their spawning grounds to the AYK region, as well as Bristol Bay, Alaska Peninsula, Southcentral Alaska, Japan, and Russia.
- ONC understands that we all, across user groups and Management Regions, have the shared interest and responsibility to protect the CWA chum salmon stock.
- in times of hardships, we all must work together and share the burden of conservation to ensure abundant populations in the future.
- ONC suggests incorporating the chum salmon harvest cap into a new section between (d) and (e). The South Unimak and Shumagin Islands commercial fisheries are limited to harvesting 280,000 chum salmon during the month of June using all gear types. If reached, it would result in a closure of the fishery for the remainder of June.

What is the issue you would like the board to address and why?

- ONC, and many subsistence users across the YK Delta, have concerns on the extreme disparity in harvest between the Alaska Peninsula commercial and Kuskokwim and Yukon River subsistence fisheries.

- This commercial fishery harvested approximately 1,168,601 chum in 2021, while subsistence users on the Kuskokwim and Yukon Rivers harvested approximately 9,6212 and 1,253 chum salmon, respectively.
- Tribes along the YK Delta are experiencing food security hardships and loss of culture when not allowed to fish, while the South Unimak and Shumagin Islands are harvesting an abundant amount of chum salmon for commercial uses.
- The stark contrast between the chum salmon commercial harvests on the South Unimak and Shumagin Islands June Salmon Commercial Fishery and subsistence harvests on the Kuskokwim is a direct result of the lack of harvest limits for chum salmon.

ADF&G RECOMMENDATION: NEUTRAL (allocative)
The department is NEUTRAL on this allocative proposal

YDFDA RECOMMENDATION: OPPOSE
Chum salmon caps have been enacted by the Board of Fisheries before with unknown results. It is YDFDA's opinion that although Chum salmon caps may have an unknown effect on the fishery, they may encourage wastage of Chum salmon. While we support the concept to reduce the harvest of Western Alaska Chum salmon, we believe that a better approach would be found in Proposal 140 where the fishing time for drift gillnet and purse seine gear is reduced from the current 352 hours to 144 hours, respectively, and fishing areas are reduced.

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Proposal 137

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

PROPOSED BY: Orutsararmiut Traditional Native Council.

PURPOSE: Reduce fishing time in the South Unimak and Shumagin Islands June Salmon Management Plan to 100 hours total.

What would be the effect if this proposal were adopted*?* *Less fishing time in the South Alaska Peninsula June fishery. Commercial salmon fishing time would be reduced from 416 hours for set gillnet gear and 352 hours for drift gillnet and purse seine gear to 100 hours for all gear types (Figure 137-1). Harvest of all species of salmon by all gear types would be reduced in June. It is difficult to assess the amount of harvest reduction because fleet behavior would change with fewer hours to fish (ADF&G 2023).*

Rationale by Proponent:

- ONC is extremely concerned about the health, safety, and general welfare of the people of our Tribe and the YK Delta Region after experiencing the lowest chum salmon (Oncorhynchus keta) return on record in 2021.
- ONC proposes to establish reduced fishing time for all gear types during the June fisheries in South Unimak and Shumagin Islands.
- the chum salmon, however, are bound for a number of areas, including the ArcticYukon-Kuskokwim (AYK) region.

- In 2021, the South Unimak and Shumagin Islands June salmon commercial fishery experienced an abundant harvest of approximately 1,168,601 chum salmon, while subsistence users on the Kuskokwim and Yukon River approximately harvested 9,6212 and 1,2533 chum salmon, respectively.
- This drastic difference of harvest between fisheries signifies that further protection is needed on the migratory route of Coastal Western Alaska (CWA) chum salmon to comply with the Policy for the Management of Sustainable Salmon Fisheries, 5 AAC 39.222.
- Therefore, it is critical to reduce commercial fishing periods in the South Unimak and Shumagin Islands, where chum salmon stock is bound for the AYK region, among many other regions.
- The Kuskokwim River faced a record low return of chum salmon in 2021 and yet again is expected to face another poor return in 2022.
- Declining stock of salmon creates unrest and stability in our community as food security declines further.
- It is of utmost importance that we act right away, to protect our livelihood and allow future generations to continue harvesting salmon

ADF&G RECOMMENDATION: NEUTRAL (allocative)
The department is NEUTRAL on this allocative proposal.

YDFDA RECOMMENDATION: SUPPORT THE INTENT:
YDFDA supports the intent of Proposal 137 to reduce commercial fishing time in the South Alaska Peninsula June Fishery to a maximum of 100 hour (Figure 137-1). However, YDFDA supports Proposal 140, as written that will not only reduce fishing time but also reduce the area fished.

YDFDA understand that the record Chum salmon harvest in 2021 of 1,169,631 salmon, while the AYK Region experienced record low Summer Chum salmon runs with total subsistence salmon closures, greatly affects the food security of the people of AYK. Because the fisheries of the South Alaska Peninsula basically fish on a schedule of 4 88-hour periods during the month of June, we believe that conservation of the AYK salmon resource is currently not shared among user groups. The South Alaska Peninsula fishermen do not share in the conservation of AYK Chum and Chinook salmon. YDFDA shares that concern and also voices that concern for the people along the Yukon who rely on the returning salmon for subsistence and their subsistence way of life. Although the number of CWAK chum salmon stocks have contributed less to the 2022 Alaska Peninsula June fisheries because of these poor salmon runs, we believe that the 2022 harvest rate of the CWAK chum salmon stock remains near or above harvest rates calculated during the WASSIP years.

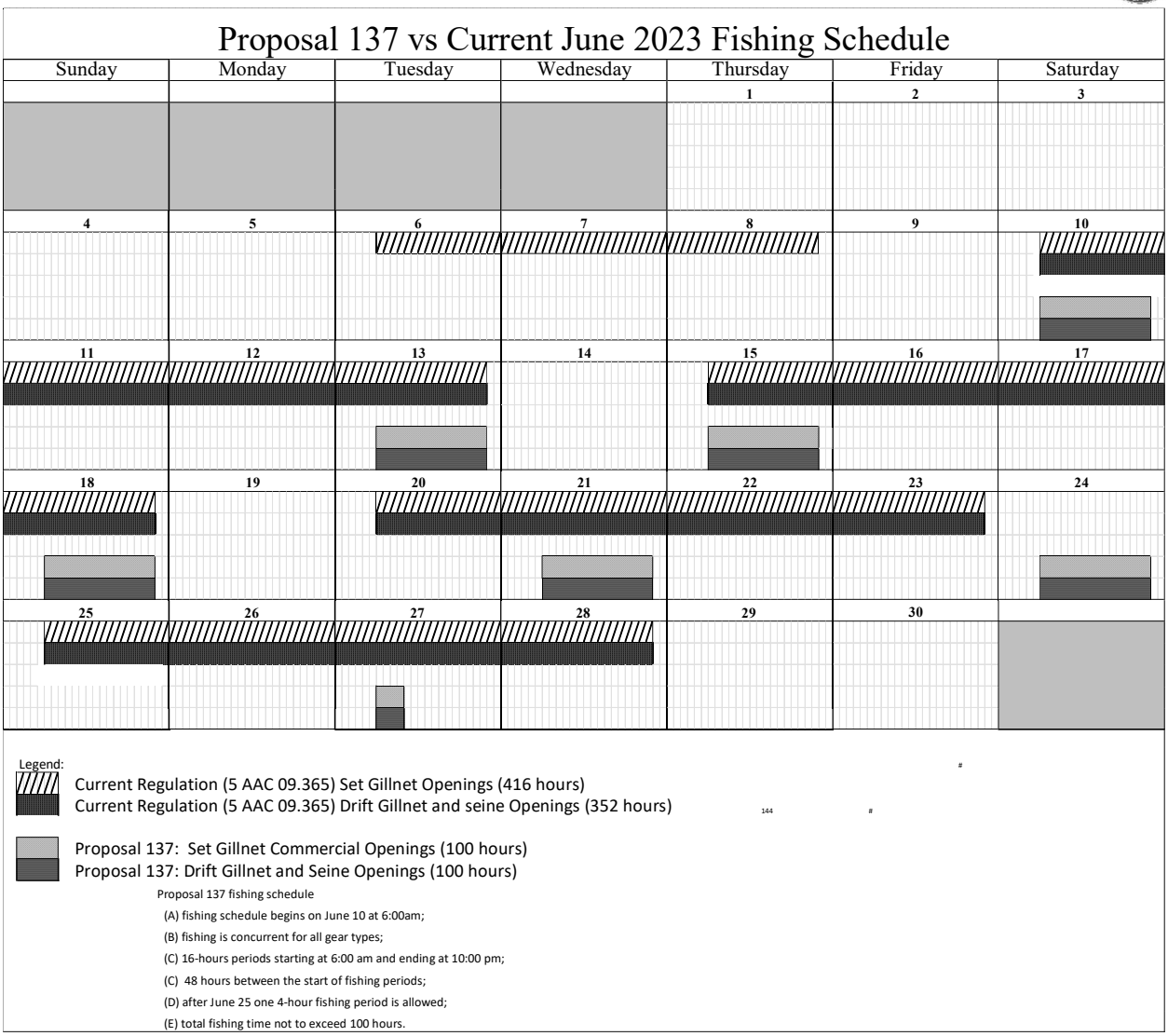

Figure 137-1. Comparison of the proposed fishing schedule in Proposal 137 to the current fishing schedule.

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Proposal 138

PC190

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

PROPOSED BY: Orutsararmiut Traditional Native Council.

Purpose: Amend the South Unimak and Shumagin Islands June Salmon Management Plan to require the department to place observers onboard commercial salmon fishing vessels

What would be the effect if this proposal were adopted? ADF&G: *This proposal would establish an on-board observer program to assess the accuracy of chum salmon harvest data from these fisheries. Observers would be required to be onboard commercial salmon fishing vessels to collect fishery and biological data. This would not impact the way the fishery is managed (ADF&G 2023).*

Rationale by Proponent:

- Low returns of chum salmon are expected again this season, thus further decreasing food security and increasing the risk of community instability in our region.
- The drastic difference of harvest between the South Unimak and Shumagin Islands June salmon commercial fishery and subsistence fishery on the Kuskokwim River in 2021must be considered.
- This, and the expected low returns of chum salmon in 2022, will likely increase tensions between users, and subsistence users will expect higher accountability of commercial fisheries.
- The alarming declines of salmon across the state, together with the research findings communicated through the roundtable discussions led by U.S. Senators Dan Sullivan and Lisa Murkowski, have increased our concern for the health, safety, and general welfare of the people of our Tribe and the YK Delta Region.
- After experiencing the lowest chum salmon return on record on the Kuskokwim River, it is of utmost importance to have the most reliable harvest information possible.
- We find the need to protect our livelihood and allow future generations to continue harvesting salmon.
- For this reason, ONC would like to address necessary changes in the **5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan**
    - enhance the accountability of harvest data collected and facilitate information gathering by incorporating an onboard observer component into the management plan.
- **5 AAC 39.141. Onboard observer program.**, and supports the findings in **5 AAC 39.141. Onboard observer program** (a), where "the Board of Fisheries finds that … observers on board fishing vessels would greatly enhance management, primarily by facilitating information gathering and by improving regulatory compliance."
- **5 AAC 39.141. Onboard observer program** (e) also states that, "onboard observers shall carry out such scientific and other duties as deemed necessary or appropriate to manage, protect, maintain, improve and extend the fish and aquatic plant resources of the State" which may be in direct support of the recently introduced Alaska Salmon Research Task Force Act.

- As stated, the Regulations for the Board of Fisheries, Sec. 16.05.251 (a)(13), the Board of Fisheries may adopt regulations it considers advisable in accordance with AS 44.62 for "regulating, in a fishery, observers on board fishing vessels as defined in AS 16.05.475(d), that are registered under the laws of the state, as defined in AS 16.05.475(c)..."
- The recommended changes include the insertion of a clause to incorporate onboard observers and amend subsequent order of stipulations. Amend 5 AAC 09.365 to read:
    - **(e) Certified observers will be onboard commercial fishing vessels to collect first-hand harvest data to assure effective monitoring, compliance, control and enforcement.**

ADF&G RECOMMENDATION: OPPOSE

The department is OPPOSED to this proposal. The department does not have concerns with the accuracy or timeliness of harvest information collected through current reporting requirements and can sample catch as needed. An observer program would be duplicative of current catch accounting programs, provide little information needed to manage the salmon fishery, and would be costly to the department and fishing industry. If the Board were to adopt this proposal it is unlikely the department could mobilize a salmon observer program and identify a funding source for the program by the 2023 fishing season and would need considerable direction and regulatory development from the board to create standards for a salmon fishery observer program because existing onboard observer program regulations are focused specifically on the crab and scallop fisheries (ADF&G 2023).

YDFDA RECOMMENDATION: SUPPORT WITH MODIFICATION

It appears that ADF&G in their recommendation fail to address the underlying problem. There is a perceived or actual problem of fishermen reducing the South Alaska Peninsula June fishery Chum salmon harvest by throwing away unwanted Chum salmon. Proposal 138 attempts to address this problem by requiring observer monitoring.

There is little to no value to the fisherman to keep Chum salmon in the June South Peninsula Fishery because the target is the much more valuable Sockeye salmon. Extremely poor Chum salmon runs returning to the AYK Region has resulted in dire food security issues for the people who use this resource for subsistence. There has been little to no subsistence harvest of Chum salmon in the Kuskokwim and Yukon Rivers during the past two years, 2021 and 2022. The South Alaska Peninsula June salmon intercept fishery is taking the food (Chum salmon) out of the mouths of AYK residents who depend on those Chum salmon for human consumption.

Discarding of Chum salmon in the South Alaska Peninsula June fishery tends to lessen the negative perception of this generous, mixed-stock, intercept fishery. Additionally, not only does this practice reduce the overall Chum salmon harvest, but it also reduces harvest rates, which are vitally important to the discussion of the impact that this fishery has on the very poor Chum salmon runs returning to the AYK region. Preliminary analysis indicates that the harvest rate on Yukon Summer Chum salmon in the June South Alaska Peninsula fishery in 2022 was approximately 5.9% (Table 138-1), while the harvest rate within the Yukon Area was near 0%.

The problem of food security for AYK residents has become more focused in 2021 because of the very large disparity between very poor Chum salmon runs that returned to the AYK Region and the record Chum salmon harvest in the South Alaskan Peninsula June fishery. The total 2021 Summer Chum salmon run into the Yukon River was the lowest on record, 155,630 salmon, while the June South Alaska Peninsula Chum salmon harvest was highest on record, 1,168,601 salmon (Figure 138-1). Although improved, the 2022 Yukon Summer Chum salmon run was also poor, 478,130 salmon. Note that entire Yukon River Summer Chum Salmon runs in 2021 and 2022 were below the lower end of the established escapement goal of 500,000 summer These Chum salmon runs were also 92% and 76%, respectively, below the recent 10-year (2011-2020) average of 1,917,981 Chum salmon (Jallen et al. 2022). There was no harvestable surplus in either year. It is also interesting to note that while the 2022 sockeye salmon harvest in the June South Alaska Peninsula, 3,905,017 sockeye salmon, similar to the 2021 harvest of 3,541,620 sockeye salmon, the Chum salmon harvest in 2022 was a much-reduced harvest of 544,097 Chum salmon, or 53% below the 2021 harvest level (Figure 138-1). This leads us to suspect that the harvest rate on CWAK chum salmon in 2001 may be much higher than the 2022 harvest rate. We calculated that the 2022 harvest rate was approximately 5.9%.

YDFDA supports the intent of this proposal. YDFDA believes that the Board should recognize that throwing away Chum salmon caught in this June fishery has been and is a potential problem and should pass real solutions. YDFDA seeks to modify this proposal by requiring electronic monitoring on all fishing boats through video capture of all landings and deliveries. Additionally, the state should verify the accuracy of fish ticket information on Chum and Chinook salmon catches. All Chum and Chinook salmon, even if these species are not sold, should be listed on the fish ticket. There is very little to no benefit to the fishermen or the processor to guesstimate the number of Chum and Chinook salmon delivered or not to sell all the Chum and Chinook salmon. All salmon landed should be required to be documented on the fish ticket. Additionally, the fishermen should be required to pay for this monitoring. Industry should be required to pay for any additional costs of fish ticket verification.

Table 138-1. Chum salmon harvest and estimated CWAK Chum salmon harvest contribution and harvest rate associated with the South Alaska Peninsula June fishery and the estimated CWAK Chum salmon and Yukon Summer Chum salmon run sizes and the estimated Yukon run contribution to the CWAK run size, 20007-2009, and estimates for 2022.

Estimated CWAK Chum Salmon Contribution to the June Harvest[b]	Total South AK Pen. June Chum Salmon Harvest[a]	Estimated CWAK Chum Salmon Contribution to the June Harvest[b]		Estimated Harvest Rate on CWAK Chum Salmon Run[c]		Estimated CWAK Chum Salmon Run Size[d]	Estimated Yukon River Summer Chum Salmon Run[e]	Estimated Percent contribution of the Yukon Run to the CWAK Run
Year	(number)	(number)	(%)	(%)		(number)	(number)	(%)
2007	297,539	177,867	59.8%	2.1%		8,401,581	2,156,600	25.7%
2008	410,932	214,464	52.2%	3.6%		6,001,760	2,066,900	34.4%
2009	696,775	420,739	60.4%	6.9%		6,123,152	1,703,200	27.8%
2021	1,168,601					***531,022***	155,630	***29.3%***
2022	544,097	96,116	17.7%	***5.9%***		***1,631,417***	478,130	***29.3%***
avg 2007-09	468,415	271,023	57.5%	4.2%		6,842,164	1,975,567	29.3%

Note: Estimates for 2001 and 2022 are ***bolded, italicized, and underlined*** .

a Data taken from Fox et.al 2022.

b Data for years 2007-2009 taken Munro et. al 2012,
data for 2022 taken from Dann et. al. 2022,
2021 data estimated from estimated CWAK total run size based on the average proportion contribution of the Yukon River Summer Chum salmon to the CWAK total run for years, 2007-2009

c 2022: estimated harvest rate for the 96,116 chum salmon harvested in the June fishery

d Data for years 2007-2009 taken Munro et. al 2012,
Estimated for 2021 and 2022 based on the average prop contribution of the Yukon Summer chum salmon to the CWAK for years 2007-2009 of 29.3%

e Fred West, ADF&G Commercial Fisheries Division, Anchorage. Personal Communication.

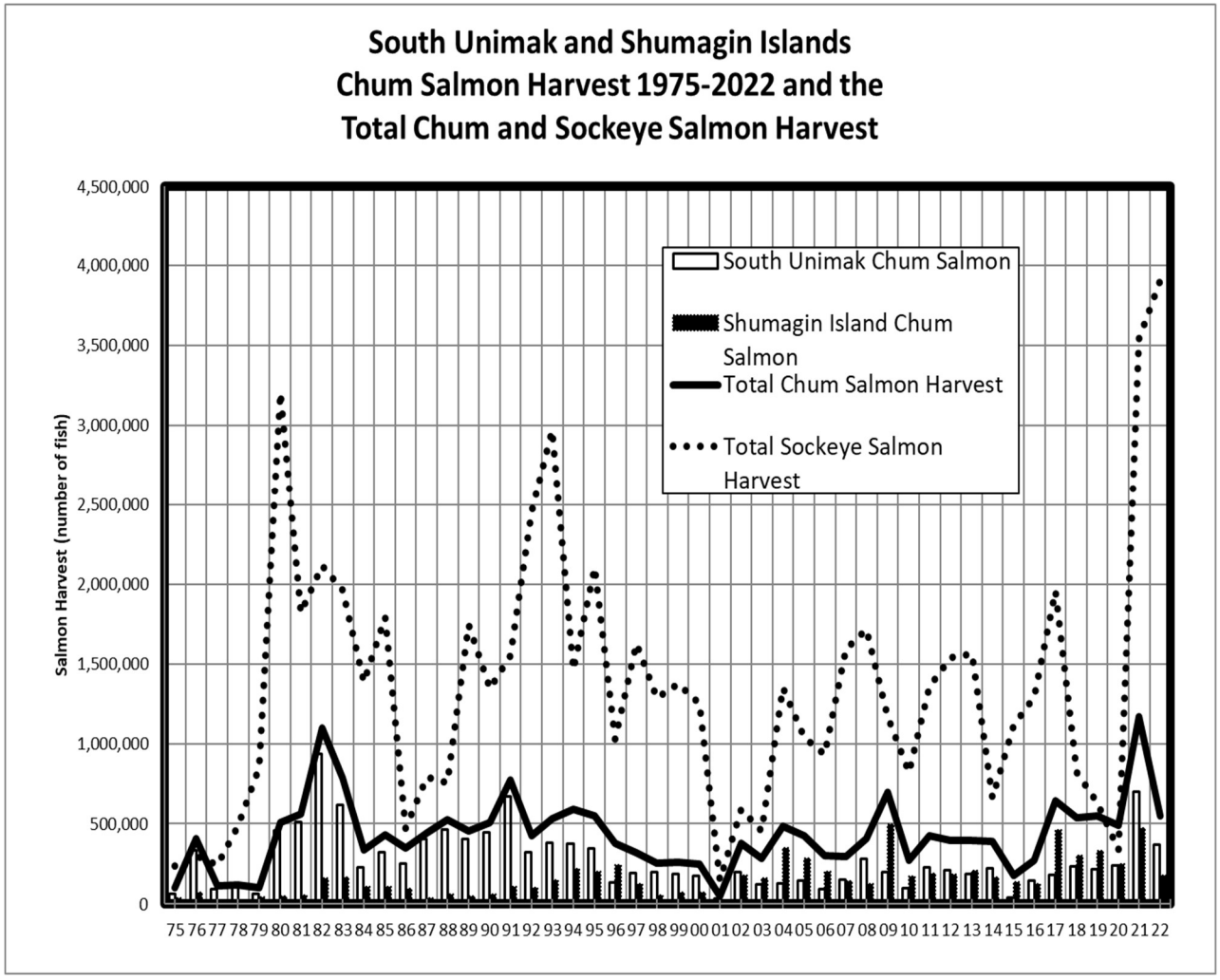

Figure 138-1. South Alaska Peninsula June Sockeye and Chum salmon harvest, 1975-2022.

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Proposal 139

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

PROPOSED BY: Tribal Resources Stewardship Program, Tanana Chiefs Conference

Purpose: Amend the South Unimak and Shumagin Islands June Salmon Management Plan to restrict commercial salmon fishing time. Rescind 5 AAC 09.365 and replace with the 2001-2003 management plan adopted by the BOF. Additionally, the restored management plan must also be edited to incorporate Chinook salmon and coho salmon in addition to chum and sockeye salmon.

What would be the effect if this proposal were adopted? ADF&G: *Reduced fishing area in the South Unimak portion of the June fishery for all gear types would reduce harvest of all salmon species in June. Reduced fishing time for all gear types in the South Alaska Peninsula would additionally reduce harvest of all species of salmon in June. Change the start date of the fishery from June 6 to June 10. Restrict fishing hours to 16 hours per day until June 24, no more than 48 hours in a 7 day period, and no more than 2 consecutive days of 16 hours of fishing for seine and drift gillnet gear before June 24. Sockeye-to-chum salmon ratio restrictions for set gillnet gear before June 24 and for all gear types after June 24 (ADF&G 2023).*

Rationale by Proponent:

- substantial quantities of Yukon River-bound salmon species and stocks are intercepted in commercial fishery operations.
- The failure to meet escapement goals and not meeting amounts reasonably necessary for subsistence (**5 AAC 01.236. Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses.**(b)) demonstrate that every Yukon-River bound salmon matters and should be conserved.
- The tribal communities of the Yukon River have experienced an unprecedented collapse of Yukon River salmon returns in recent years.
- 2021 yielded an unprecedented, almost 90%, absence of Yukon River chum (summer and fall) Yukon River summer chum harvest averages 2M fish…in 2021 that number was 152,000. Yukon River fall chum harvest averages 998,000 fish…in 2021 that number was 102,000.
- The failure to meet various salmon escapement goals and the entire closure of reasonable subsistence salmon fishing opportunities in 2021 requires management attention and action in the Alaska Peninsula-Aleutian Island fisheries management area.
- The fact that state and federal managers again predict a complete closure of Yukon River subsistence salmon fishing during the 2022 season is alarming
- commercial salmon harvests throughout Area M south of the Alaska Peninsula where AYK salmon are intercepted should be eliminated entirely until such time that fisheries management decisions can be demonstrated to be sustainable.
- So, that our salmon can return to the Yukon River and its tributaries to spawn and provide for priority customary and traditional uses. While, meeting the United States' Pacific Salmon Treaty obligations to Canada and our First Nations relatives.
- The lack of proactive and precautionary management actions to conserve Yukon River chum salmon stocks in Alaska Peninsula Management Area M commercial fisheries in 2020 and 2021 is highly problematic as well as unsustainable.

- These areas which intercept Yukon River-bound salmon stocks must be closed or sufficiently restricted to ensure that commercial interception does not compromise a mixture of topics. Including, sustainable management principles, mixed stock fishery policies, and meeting escapement goals of Yukon River Chinook salmon, chum salmon, and other salmon stocks.
- The Board addressed these concerns two decades ago; however, those interception mitigation measures were repealed or relaxed to such an extent that the June commercial fisheries in the South Unimak and Shumagin Islands sections, and the other fisheries of Area M.
- Request a new management plan that guides Area M commercial fisheries and ensures only sustainable interceptions of AYK-bound salmon stocks that are surplus to AYK escapement needs, priority AYK subsistence needs (as measured by Amounts reasonably Necessary for Subsistence Uses codified in **5 AAC 01.236. Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses.**(b), and historical harvest levels by AYK sport and AYK commercial fisheries to ensure healthy and sustainable AYK salmon and AYK communities.
- WASSIP should be used to inform mitigation actions until such time that newly developed genetic markers are incorporated into more relevant in-season mixed stock analyses. Waiting for action until the ADF&G reinitiates these assessments is unacceptable.
- The failure for more than a decade of ADF&G to conduct genetic mixed stock analysis and assessments of Area M commercial fisheries' interception of Yukon River Chinook salmon, chum salmon, and coho salmon bound for AYK spawning rivers and tributaries is irresponsible and unsustainable.

ADF&G RECOMMENDATION: NEUTRAL (allocative)
The department is NEUTRAL on this allocative proposal.

YDFDA RECOMMENDATION: SUPPORT THE INTENT
YDFDA supports the intent of Proposal 139 to reduce the fishing time in the South Alaska Peninsula June fisheries. However, a more streamlined and less confusing proposal that specifically addresses the changes in regulatory language is found in Proposal 140. Therefore, YDFDA supports the intent of Proposal 139 but believes that Proposal 140, as written, is the best proposal to address concerns expressed in Proposal 139.

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Proposal 140

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

PROPOSED BY: Fairbanks Advisory Committee Fisheries Sub-Committee

PURPOSE: Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time, as follows: Repeal the current South Unimak and Shumagin Islands June Salmon Management Plan and readopt an amended version of the management plan in place from 2001-2003, as follows: Erase all of the current 5 AAC 09.365 and replace with the following, edited language from the 2001-2003 plan

What would be the effect if this proposal were adopted? ADF&G: *Reduced fishing time for all gear types in the South Alaska Peninsula. Change the start date of the fishery from June 6 to June 10. Restrict fishing hours to 16 hours per day through June 30, no more than 48 hours in a 7-day period, and no more than 2 consecutive days of 16 hours of fishing for seine and drift gillnet gear through June 30 (Figure 140-1). Reduced fishing area in the South Unimak portion of the June fishery for all gear types (Figure 140-1). Reduction in fishing time and area would reduce harvest of all salmon species in June (ADF&G 2023).*

This proposal, in (a), also seeks to include Chinook (king) salmon in this mixed-stock fishery and also acknowledges that the Chum, Sockeye, and Chinook salmon caught in this fishery are also bound to Bristol Bay and the Arctic-Yukon-Kuskokwim region, as well as other areas across the North Pacific Ocean.

Rationale by Proponent:

- Reduce excessive harvest of migrating discrete stocks of concern in the Cook Inlet, Bristol Bay, and AYK areas.
- 2021 saw a decrease of Yukon River summer and fall chum escapement of almost 90%. This was without any directed fishery and no subsistence harvest.
- The Yukon River summer chum run averages 2 million fish. In 2021 that number was 152,000.
- The Yukon River fall chum run average is 998,000 fish. In 2021 that number was 102,000.
- Two large producers of chum salmon in the Yukon Drainage, the Chena and Salcha Rivers, saw only 22% of average escapement under perfect counting conditions.
- Alaska did not meet any of its Treaty obligations with Canada.
- This resulted in unprecedented loss of subsistence chum fishing opportunity in the Yukon River.
- At the same time, the S. Unimak and Shumagin Islands June 2021 fishery had the highest harvest of chum salmon in the history of the Area M fishery. 1,168,601 chum were harvested in the 2021 June fishery alone.
- This indicates that there is a direct correlation between the high harvest of chum in Area M to the loss of chum escapement to the AYK and a total loss of chum subsistence harvest.

- Reducing the Area M June fishery will allow opportunity to see if chum escapement in the AYK will be able to meet escapement goals and allow for a subsistence harvest. This is ultimately both a conservation and a subsistence issue.

ADF&G RECOMMENDATION: NEUTRAL (allocative)

The department is NEUTRAL on this allocative proposal.

YDFDA RECOMMENDATION: SUPPORT WITH MINOR MODIFICATIONS

YDFDA supports Proposal 140 with a minor modification the the proposed area open to seine gear.

During the years of the WASSIP study, 2007-2009, the CWAK chum salmon stock contributed an estimated median value of 60%, 52% and 60%, respectively to the total South Alaska Peninsula June fishery Chum salmon harvest (Table 141-1, Munro et al. 2012). Estimated associated median numbers of CWAK Chum salmon harvested were 177,867 in 2007, 214,464 in 2008 and 420,739 in 2009 (Table 141-1, Munro et al.2012). Associated harvest rates for these three years were 2.1%, 3.6% and 6.9%, respectively (Table 141-1, Munro et al. 2012). In 2022, the median contribution of the CWAK Chum salmon in the South Alaska Peninsula June fishery was a much-reduced 96,116 salmon, accounting for only 17.7% of the total harvest (Table 141-1, Dann et al. 2022). However, YDFDA has calculated the harvest rate of the CWAK Chum salmon run by the South Alaska Peninsula June fishery at 5.9%, which is within the range of harvest rates documented in WASSIP (Munro et al. 2012).

The contribution of the CWAK chum salmon stock to the South Peninsula June fishery has been reduced in 2022 from an average of 57.5% during 2007-2009 (Munro et al. 2012) to 17.7% in 2022 (Dann et al. 2023). However, the harvest rate for the 2022 season is unknown because the total run size estimate of the CWAK Chum salmon stock is unavailable at this writing. Therefore, a harvest rate cannot be similarly calculated as was done in Munro et al. 2012. However, YDFDA noticed that the contribution of the Yukon River Summer Chum salmon run to the CWAK Chum salmon run, during 2007-2009 averaged about 29.3% (Table 140-1) and ranged from 25.7% in 2007 to 34.4% in 2008 (Data taken from: Munro et al. 2012, Hamazaki and Contiz 2015, and Fred West, ADF&G Commercial Fisheries Division, Anchorage, personal communication). Based on this average contribution, YDFDA estimated the 2022 CWAK Chum salmon run size at 1,631,417salmon, with the resulting harvest rate of 5.9% (Table 140-1). While YDFDA realizes that the 2022 total CWAK Chum Salmon run size estimate was not as rigorously calculated as the run size estimates presented in Munro et al. 2012, we believe that both the CWAK Chum salmon run size estimate, 1,631,417, and resulting harvest rate estimate, 5.9% are reasonable. Indeed, while the total CWAK Chum salmon run size estimate is appreciable below the range of run sizes presented in Munro et al. 2012, 6,123,152 in 2009 to 8,401,581 in 2007, the estimated harvest rate for 2022, 5.9%, is within the estimated range of harvest rates calculated by Munro, et a. 2012, 2.1% in 2007 to 6.9% in 2009 (Table 140-1).

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Table 140-1. Chum salmon harvest and estimated CWAK Chum salmon harvest contribution and harvest rate associated with the South Alaska Peninsula June fishery and the estimated CWAK Chum salmon and Yukon Summer Chum salmon run sizes and the estimated Yukon run contribution to the CWAK run size, 20007-2009, and estimates for 2022.

Estimated CWAK Chum Salmon Contribution to the June Harvest[b]	Total South AK Pen. June Chum Salmon Harvest[a]	Estimated CWAK Chum Salmon Contribution to the June Harvest[b]		Estimated Harvest Rate on CWAK Chum Salmon Run[c]		Estimated CWAK Chum Salmon Run Size[d]	Estimated Yukon River Summer Chum Salmon Run[e]	Estimated Percent contribution of the Yukon Run to the CWAK Run
Year	(number)	(number)	(%)	(%)		(number)	(number)	(%)
2007	297,539	177,867	59.8%	2.1%		8,401,581	2,156,600	25.7%
2008	410,932	214,464	52.2%	3.6%		6,001,760	2,066,900	34.4%
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2021	1,168,601					***531,022***	155,630	***29.3%***
2022	544,097	96,116	17.7%	***5.9%***		***1,631,417***	478,130	***29.3%***
avg 2007-09	468,415	271,023	57.5%	4.2%		6,842,164	1,975,567	29.3%

Note: Estimates for 2001 and 2022 are ***bolded, italicized, and underlined*** .

a Data taken from Fox et.al 2022.

b Data for years 2007-2009 taken Munro et. al 2012,
data for 2022 taken from Dann et. al. 2022,
2021 data estimated from estimated CWAK total run size based on the average proportion contribution of the Yukon River Summer Chum salmon to the CWAK total run for years, 2007-2009

c 2022: estimated harvest rate for the 96,116 chum salmon harvested in the June fishery

d Data for years 2007-2009 taken Munro et. al 2012,
Estimated for 2021 and 2022 based on the average prop contribution of the Yukon Summer chum salmon to the CWAK for years 2007-2009 of 29.3%

e Fred West, ADF&G Commercial Fisheries Division, Anchorage. Personal Communication.

In both 2021 and 2022, the South Peninsula fisheries likely accounted for nearly 100% of the harvest of Yukon River Summer Chum salmon and most likely a very high percentage of other AYK Chum salmon harvests. Even though the Upper Yukon Chum salmon stock contributes little to the South Alaska Peninsula fisheries, these fisheries accounted for an average of 10.9% of the total harvest of the Upper Yukon Chum salmon stock during 207-2009, ranging from 9.6% in 2007 to 12.9% in 2009 of the harvest. In 2022, the South Alaska Peninsula fishery accounted for 32.4% of the total harvest of this stock. It is also very likely that the Alaska Peninsula Fisheries accounted for a high percentage of the Yukon River Chinook salmon harvest, as well as other AYK Chinook salmon harvests.

It is extremely unfair that this mixed-stock, intercept fishery, hundreds of miles from the Yukon River, that harvests very few salmon from local stocks, is allowed to take nearly all of the

harvest of the Yukon River Chum and Chinook salmon stocks, while not being, at least, partially responsible to meet salmon escapement goals and Pacific Salmon Treaty obligations. All harvesters of AYK salmon stocks should be required to share in the conservation of these salmon stocks because they benefit from the salmon. The people who live along the Yukon River and other AYK rivers and streams have borne all the conservation of these stocks by not fishing for salmon for the past two years and have had severe restrictions on subsistence and commercial fisheries for over a decade or more. The most recent 10-year period includes years of very low harvests and fishing restrictions, such as closures during the 2011–2020 summer seasons to protect Chinook salmon, in addition to the complete salmon subsistence fishing closures in 2021 and 2022 because of very low runs of all salmon.

Historically, both commercial and subsistence fishing in the Yukon Area was allowed by scheduled fishing time, much the same way the South Alaska Peninsula fisheries are currently conducted. At that time, there were more than enough salmon to meet escapement goals, provide for subsistence needs and allow generous, scheduled commercial fishing time. Currently, because of concern for subsistence needs in the AYK Region, as well as escapement requirements, commercial fishing has been suspended and subsistence fishing is only allowed through emergency orders. Fishing on a schedule for both subsistence and commercial in the AYK Region has been replaced by fishing by emergency order if fishing occurs at all. The fishermen of the South Alaska Peninsula fisheries are currently fishing on a very generous schedule. Out of the possible 448 hours in June from June 10 at 6:00 am through June 28 at 10:00 pm, the purse seine and drift gillnet fishing fleet fish on a schedule for a total of 416 hours, or 78.6% of the time. Fishermen in the South Alaska Peninsula fisheries fish on a schedule, regardless of the origin or stock status of the fish stocks they harvest. They have no responsibility for conservation of the resource. YDFDA believes that the Alaska Peninsula Fisheries should be managed, at least in part, to ensure that the people of AYK Region have fish for subsistence and that salmon escapement goals and U.S./Canada Treaty obligations are met. Management plans must be changed to allow these fishers some responsibility for conservation of the salmon stocks. Fishing time must be reduced to protect AYK salmon stocks and to provide for subsistence and the subsistence way of life along with some commercial opportunity. Proposal 140 seeks to allow the South Alaska Peninsula fishermen to share in the conservation of AYK-bound Chum, Sockeye and Chinook salmon by reducing both fishing time and area open to fishing in the June fishery. This fishing schedule (Figure 140-1) seeks to allow meaningful windows in the month of June to allow portions of the CWAK, Bristol Bay, and East of Kodiak salmon stocks to migrate through the fishery with much less exploitation.

Purse seine gear has dominated the harvest of Chinook salmon in the Post-June fishery and the Sockeye and Chum salmon harvests in the Shumagin June fishery. Although the Sockeye and Chum salmon June harvests in the Unimak Island fishery was initially dominated by purse seines in the 1980s and early 1990s. Beginning in 1994, these harvests were dominated by drift gillnet gear. However, beginning in 2006 there was an increasing trend in the harvest by purse seine gear in the Unimak fishery for both Sockeye and Chum salmon. Recently, since 2019, all salmon harvests in all fisheries have been dominated by purse seine gear (Figure 140-2.) Note that Chinook salmon harvests by gear type is unavailable for the June fishery.

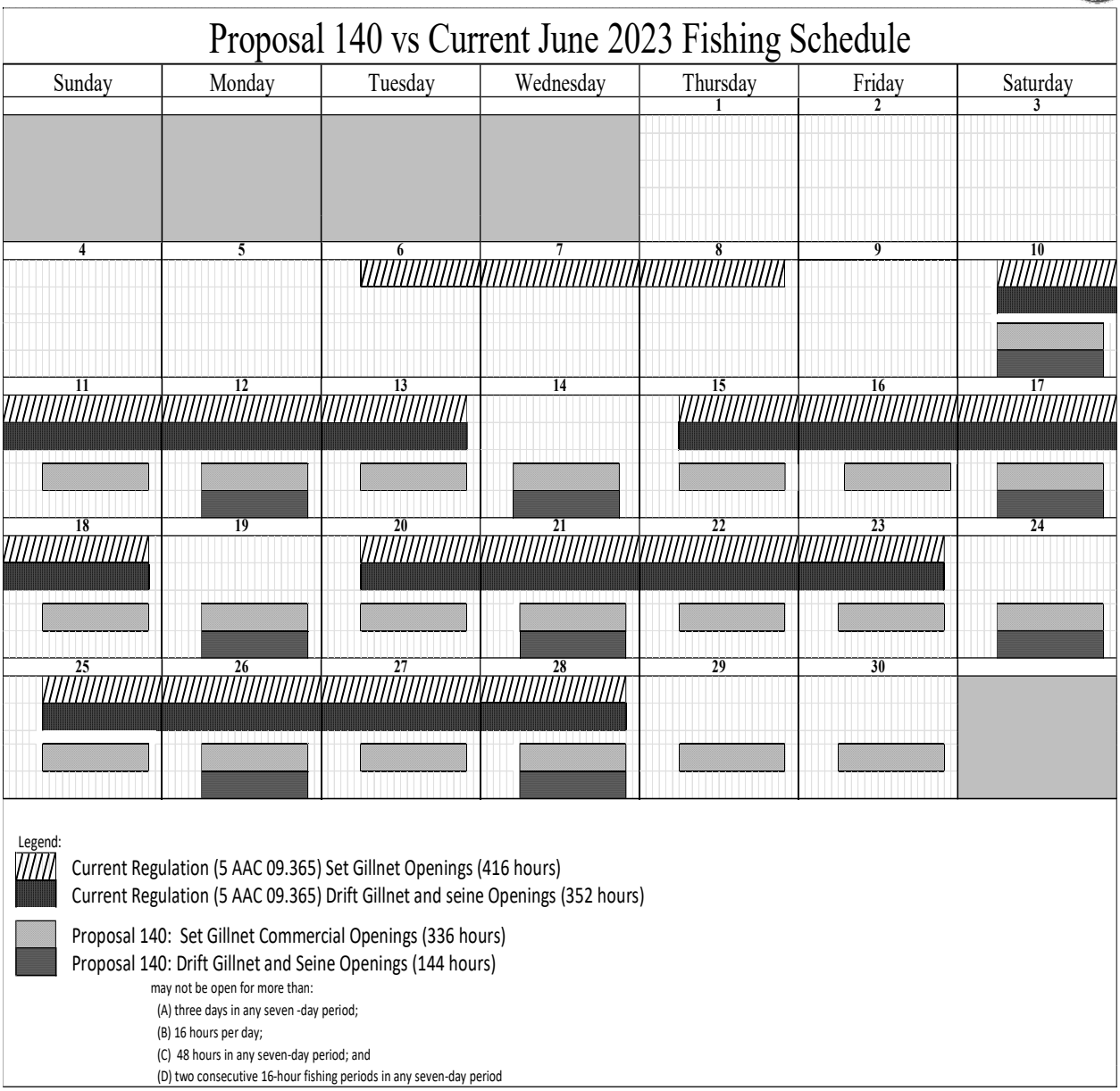

Figure 140-1. Comparison between current fishing time and proposed fishing time (Proposal 140), South Alaska Peninsula June fishery.

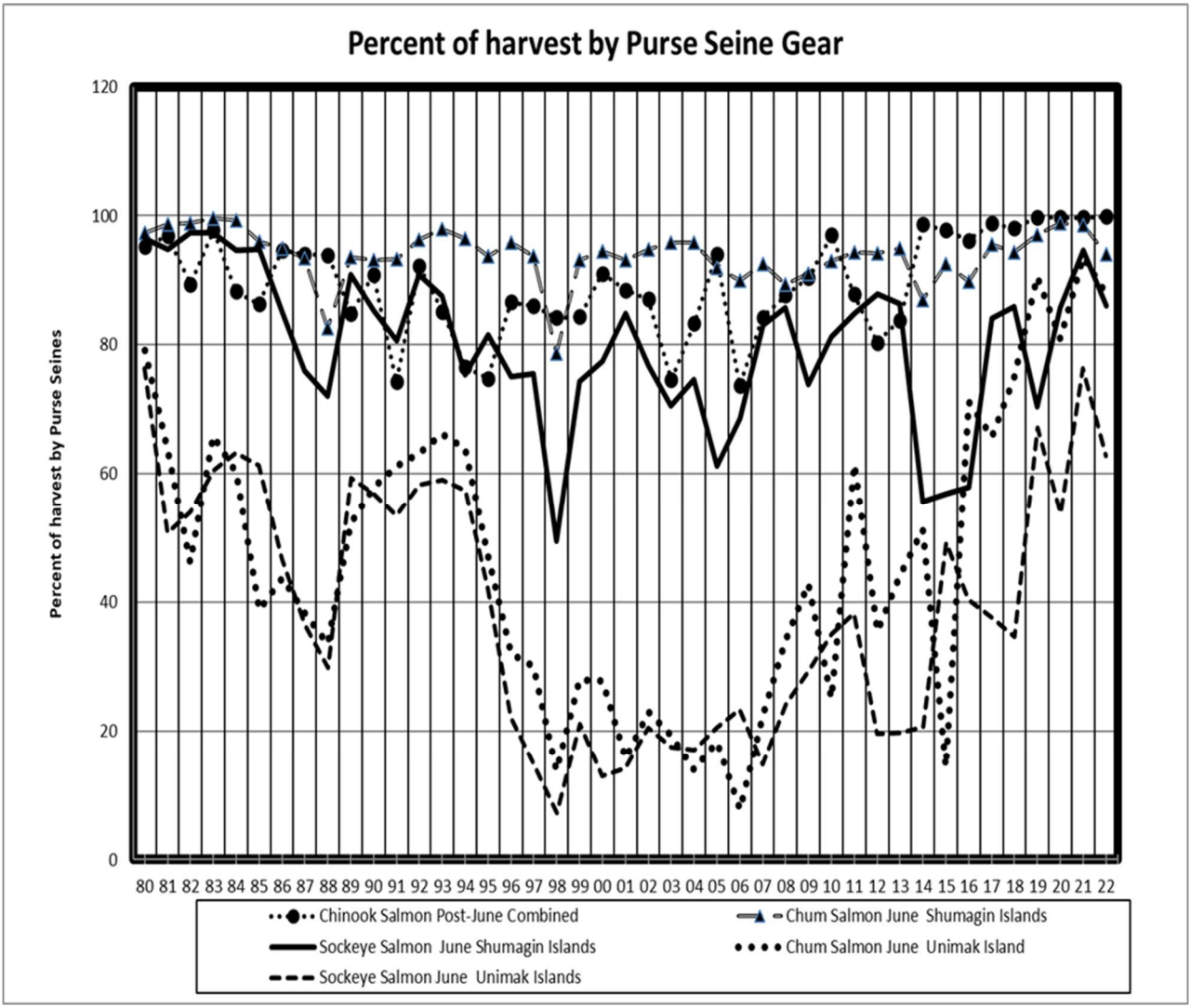

Figure 140-2. Percent harvest by purse seine gear in the South Alaska Peninsula fisheries, 1980-2022. Note: Chinook salmon harvest by gear type is unavailable for the June fishery.

While AYK village residents have little food security because of the lack of all salmon returning to the AYK Rivers and streams, the fishermen of the South Alaska Peninsula fisheries have been very successful. The people who live within the Yukon River Drainage have not been allowed to harvested salmon in the last two years, 2021 and 2022. Subsistence fishing for salmon was not allowed. During the same period, the 69 and 72 fishermen who fished purse seine gear shard the exvessel value of the South Alaska Peninsula purse seine fisheries of over $20.1 Million in 2021 and $24.3 Million in 2022 (Fox et al. 2022). For the years, 2010 – 2022, the average purse seine fisherman was paid an average of $608,922 (Figure 104-3). More recently, during the past two years, the average purse seine fisherman was paid an average of $291,543 in 2021 and $337,738 in 2022 (Figure 140-3). We understand this is based on exvessel value and is a base price. This exvessel value does not include bonuses paid to fishermen. So, the average payment paid to the average purse seine fisherman was probably much more. For comparison, in 2020, the last year

the commercial Summer Chum salmon fishery was allowed in the Yukon River, the exvessel value of the entire fishery for the Yukon Area entire fishing season was $51,395. The total number of permits making at least one delivery was 183 (Ransbury et al. 2022). Accordingly, the average Yukon Area fisherman was paid an average of $162 for the entire season. The fall season commercial salmon fishery has not been allowed since 2019. The last directed Chinook salmon fishery was in 2007.

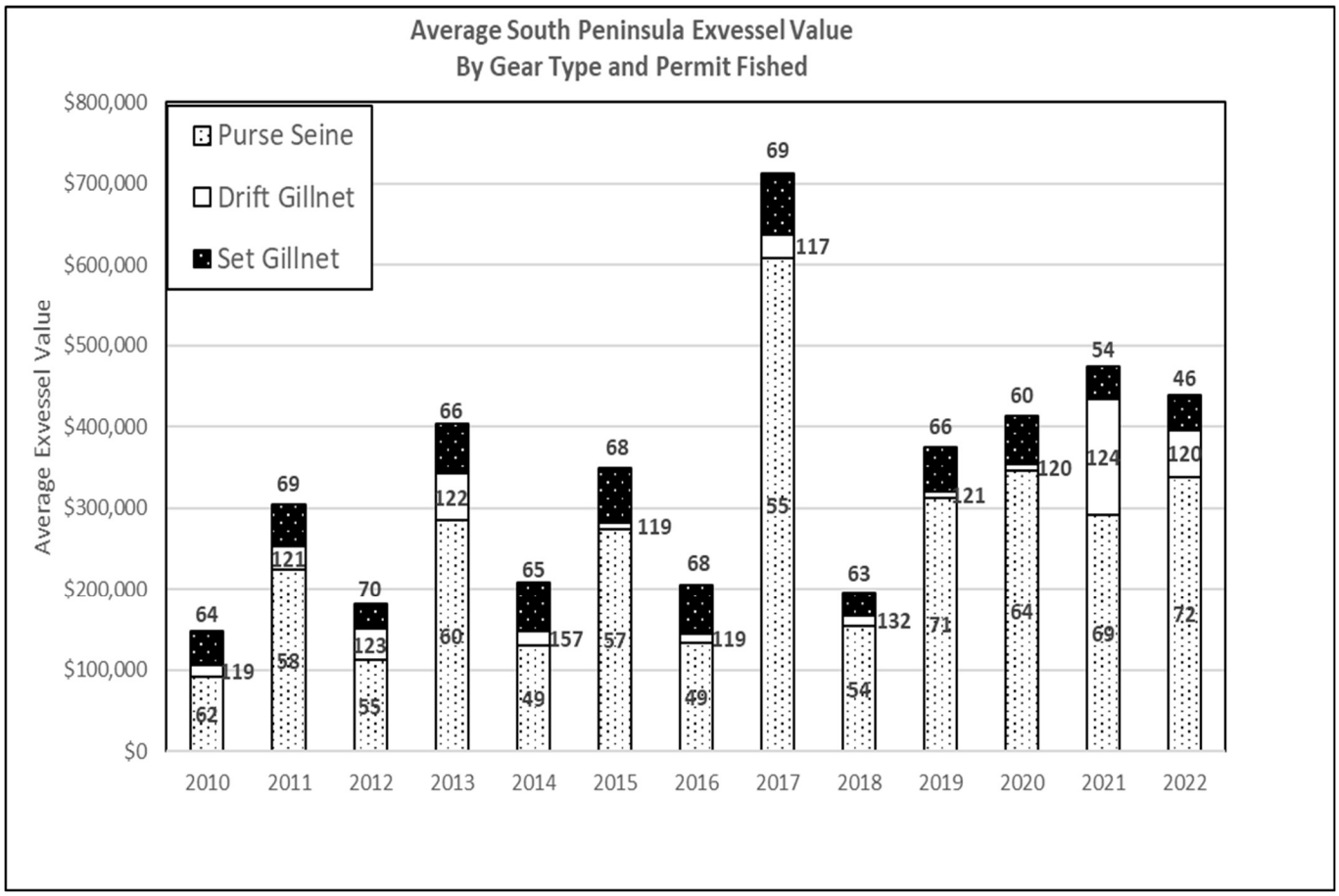

Figure 140-3. Average exvessel value paid to South Alaska Peninsula fishermen by gear type for years, 2010-2022. Numbers within and next to bars indicate the number of actively fished permits by gear type.

The most recent 5-year (2018-2022) average Chum salmon harvest in the South Alaskan Peninsula June fisheries of 657,873 Chum salmon is the highest 5-year average for this data set (1960-2022), with the largest annual harvest of 1,169,601 chum salmon occurring in 2021 (Figure 104-4). This record harvest occurs the same year that the record low total Summer Chum salmon run size of 155,630 returned to the Yukon River (Table 140-1). Similar very low runs also returned to other rivers and streams throughout the AYK Region in 20231. Also, during this year, the South Alaska Peninsula Sockeye salmon harvest of 3,541,620 sockeye salmon was the highest to date (Figure 140-5). However, this harvest was exceeded in 2022 with a sockeye salmon harvest in the June fishery of 3,905,017 sockeye salmon. Interestingly, the

chum salmon harvest fell precipitously to 544,097 Chum salmon from the 2021 record harvest (Figure 140-6). The 2022 total South Alaska June harvests represent a overall 10% increase in sockeye salmon harvest with an overall 53% decrease in the chum salmon harvest from the 2021 harvests. Specifically, in the South Unimak District, the 2022 sockeye salmon harvest increased by 30% over the 2021 harvest with an associated 47% decrease in the Chum salmon harvest, while in the Shumagin Islands the 2022 Sockeye salmon harvest decreased by 30% with an associated decrease of 62% decrease in the Chum salmon harvest from the 2021 harvests. This deviation from the long-term Sockeye:Chum salmon average ratio of approximately 3.00 to the 2022 overall ratio of 7.18 (Figure 140-6 needs further investigation as to the cause, especially in relation to the normal 2011 Sockeye:Chum salmon ratio of 3.03. The fishery-specific Sockeye:Chum salmon ratio for the 2022 South Unimak June fishery was 8.43. The ratio for the Shumagin Island fishery in 2022 was 4.61. The 2021 ratio for these two fisheries was 3.40 and 2.78, respectively.

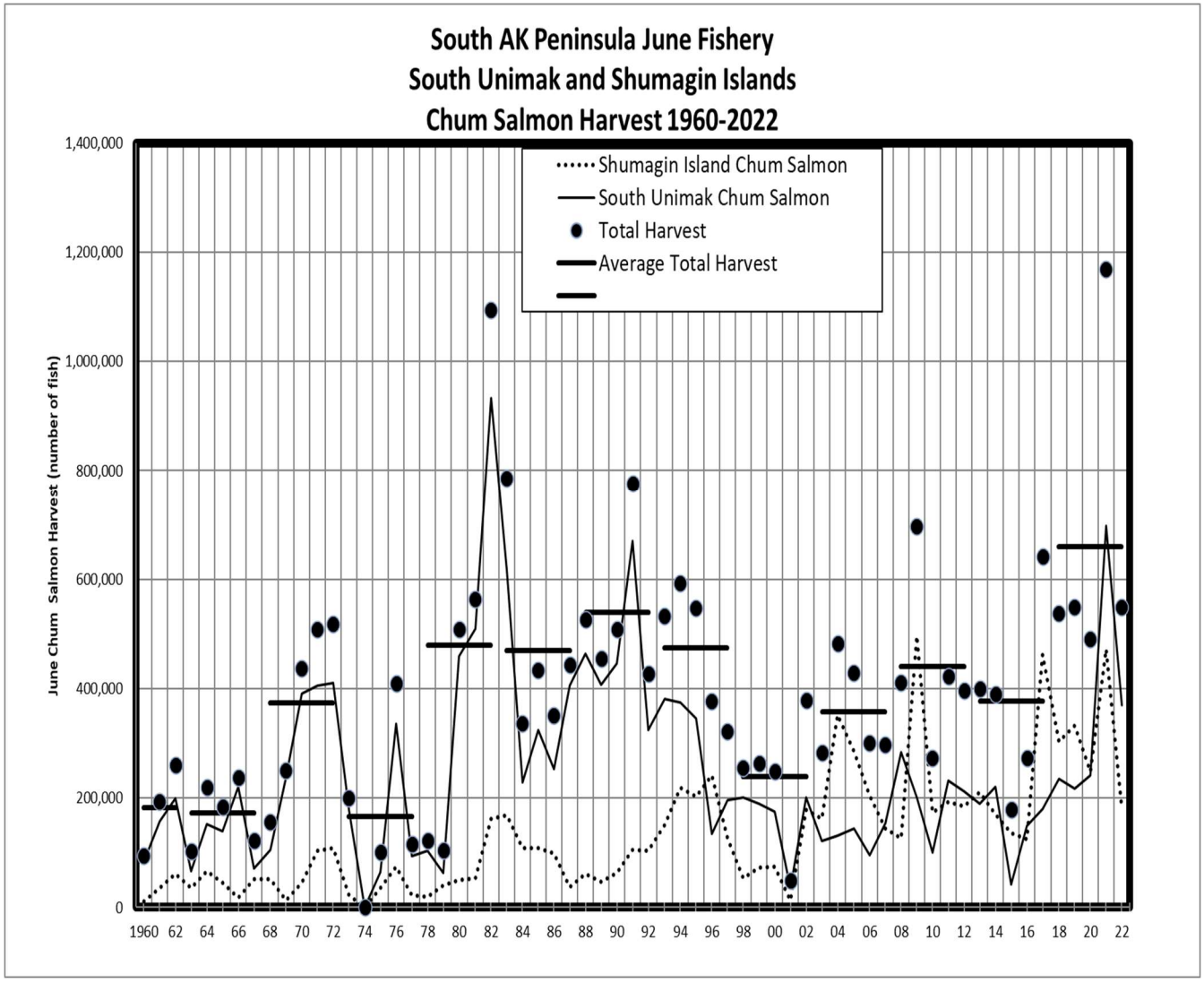

Figure 140-4 South Alaska Peninsula June Chum salmon harvest, 1960-2012.

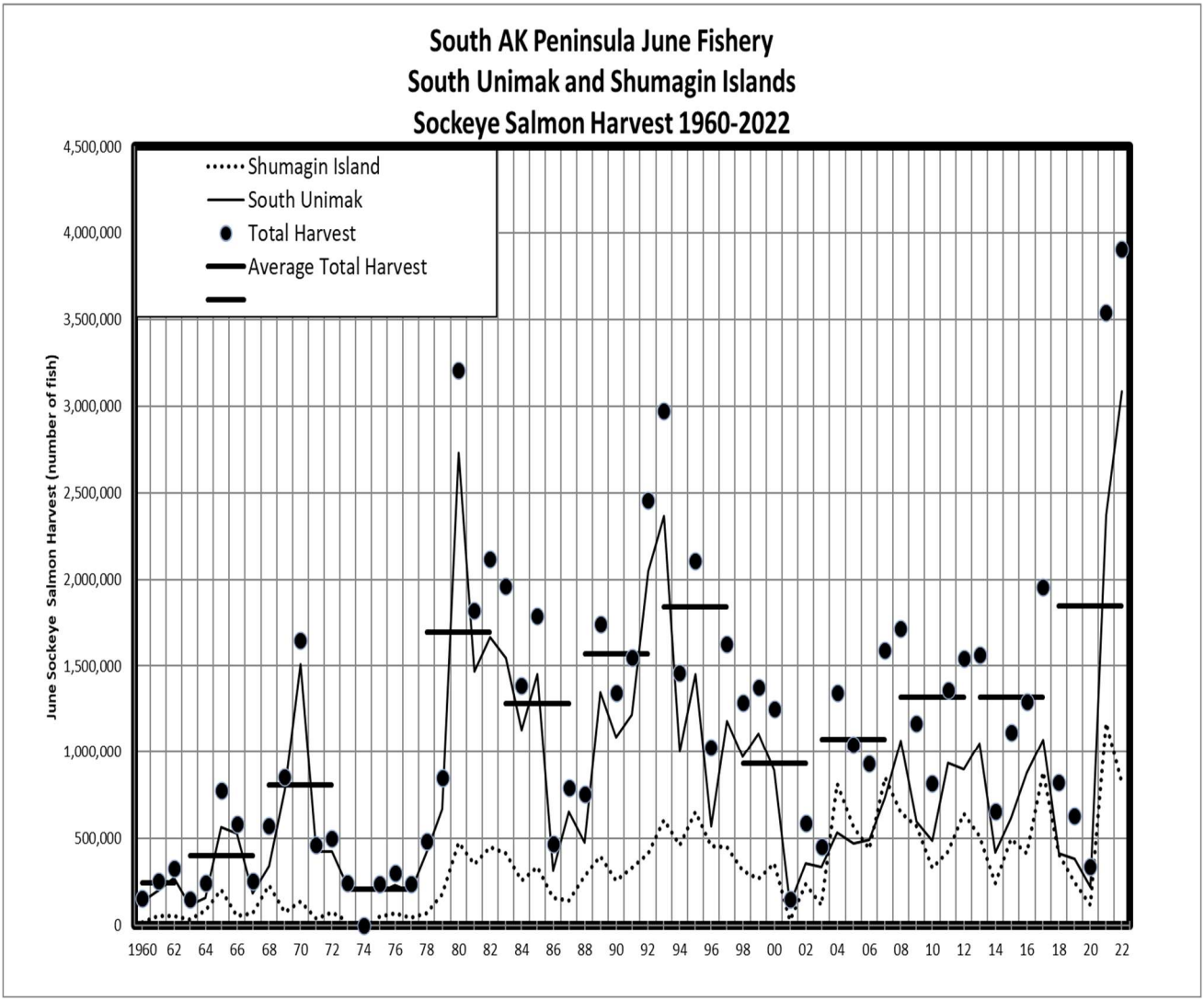

Figure 140-5 South Alaska Peninsula June Sockeye salmon harvest, 1960-2012.

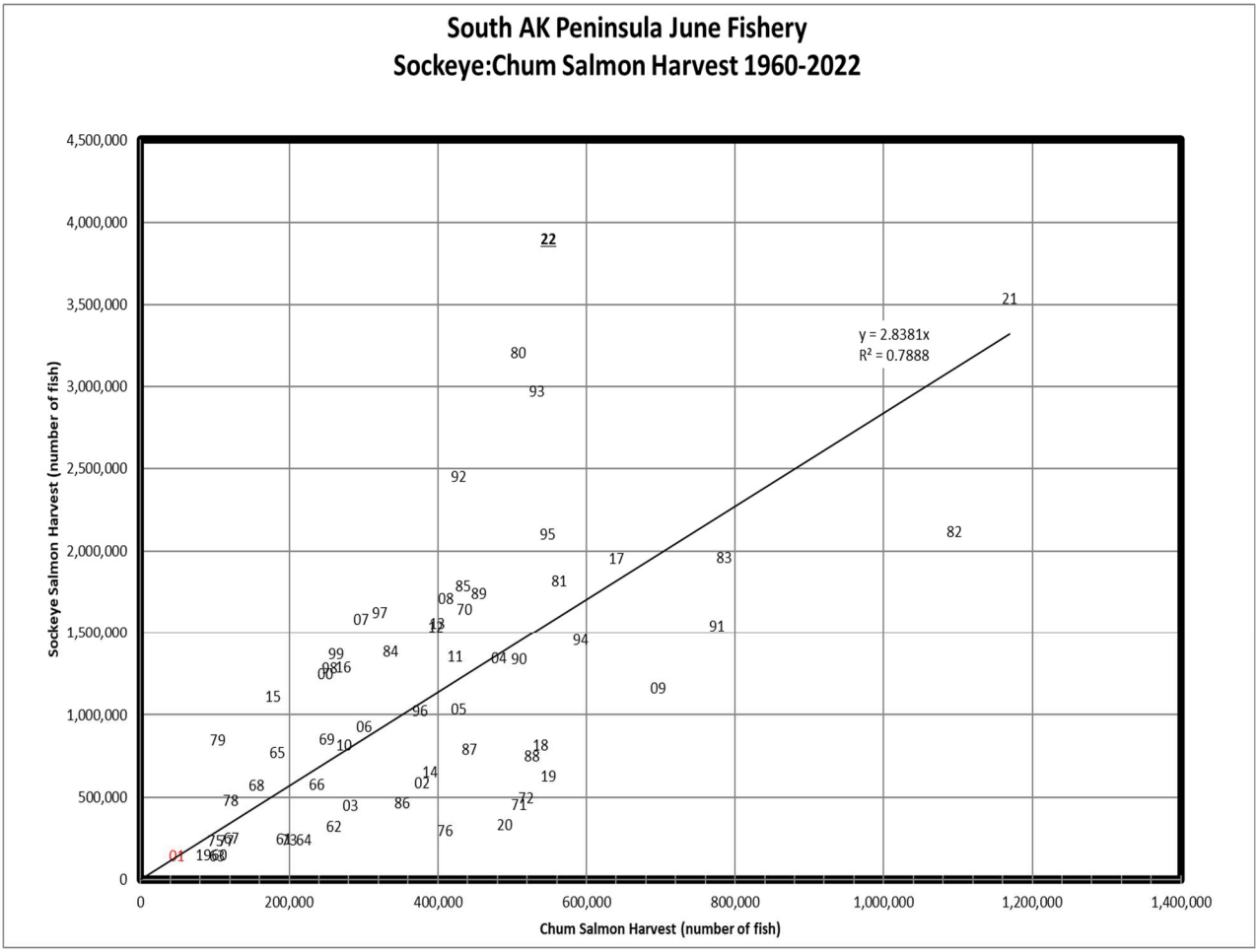

Figure 104-6. Relationship between Sockeye and Chum salmon harvests, South Alaska Peninsula June fishery, 1960-2022. Numbers on graph indicate the year of the harvest.

YDFDA has become very concerned with the increasing Chinook salmon harvests in the South Alaska Peninsula fisheries (Figure 104-7). The extremely high Chinook salmon harvest in the Shumagin Islands June fishery in 2015 is of particular concern. Chinook salmon stocks not only in AYK Region are very poor, but stocks in Bristol Bay, Cook Inlet, and other portions of the state are also below average to very poor. Recent 5-year average Chinook salmon harvests in the South Alaska Peninsula fisheries from 2013 to the present, have increased dramatically over historical records (Figure 104-7). Of particular interest is the increase in Chinook salmon harvests in the Post-June fishery (Figure 104-7). Because of the very poor runs of Chinook salmon to the AYK rivers and streams for more than the past two decades, harvests have been severely curtailed and escapement goals and U.S. Pacific Salmon Treaty obligations have not been achieved on a consistent basis. The last directed Chinook salmon fishery in the Yukon Area occurred in 2007. Subsistence fishing for Chinook salmon has been restricted in many years of the past two decades and was completely closed during the most recent two years, 2021 and 2022. Accordingly, YDFDA recommends that a genetic stock identification study be completed on the Chinook salmon harvested in both the June and Post-June South Alaska Peninsula fisheries. Additionally, Board passage of Proposal 140 may have a positive effect on Chinook salmon run sizes within the AYK Region and possibly other areas in addition to the positive effect on AYK Chum and Sockeye salmon stocks.

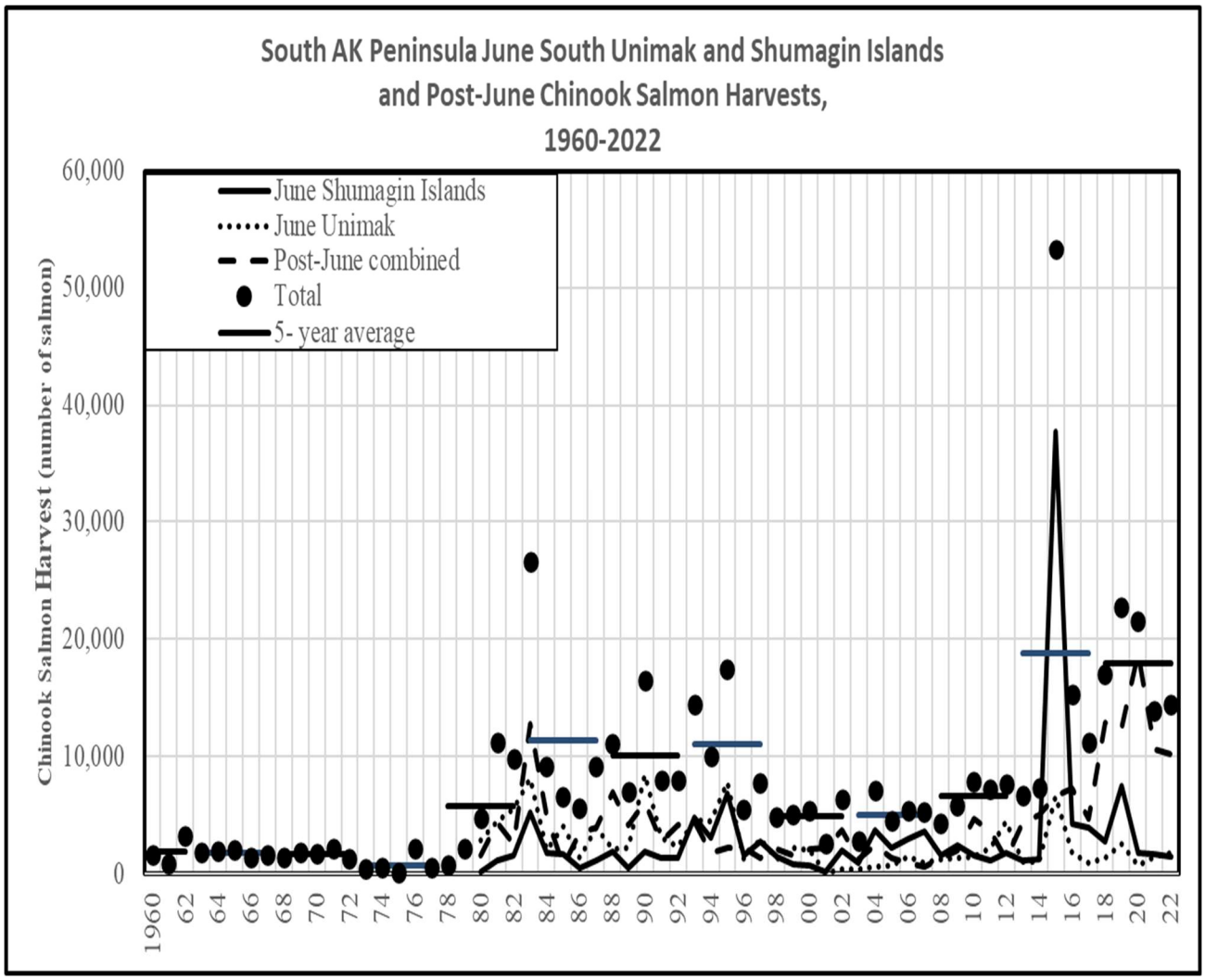

Figure 104-7. South Alaska Peninsula June (South Unimak Island and Shumagin Islands) and Post-June Chinook salmon harvests, 1960-2022.

In 2004, the Board expanded South Alaska Peninsula areas open to fishing in June to include the entire Unimak and Southwestern districts, East and West Pavlof Bay, and Bechevin Bay and Shumagin Islands sections (Fox et al. 2022). In 2007, the Board made additional changes to the June fishing areas open drift gillnets (Fox et al. 2002). In 2019 the Board closed the waters of the Volcano Bay Section of the Southwestern District, the Belkofski Bay Section of the Southwestern District, excluding those waters inside of a line between Vodapoini Point (lat 55°01.88′N, long 162°24.80′W) and Bold Cape (lat 55°01.24′N, long 162°16.40′W) and the South Central District to purse seine gear. The current fishing areas open for set gillnet and seine gear are presented in Figure 104-8; areas open for drift gillnets are presented in Figure 104-9. Figure 104-10 depicts the proposed June fishing areas by gear type.

YDFDA supports the closures of these waters with a minor modification. As mentioned above the Board closed the Belkofski Bay and Volcano Bay Sections waters to purse seine gear during the 2019 Board meeting. Proposal 140 seeks to reopen a small portion of these waters, while closing the rest of these sections closed to fishing. YDFDA seeks to modify Proposal 140 to keep these waters closed to purse seine gear (Figure 140-11)

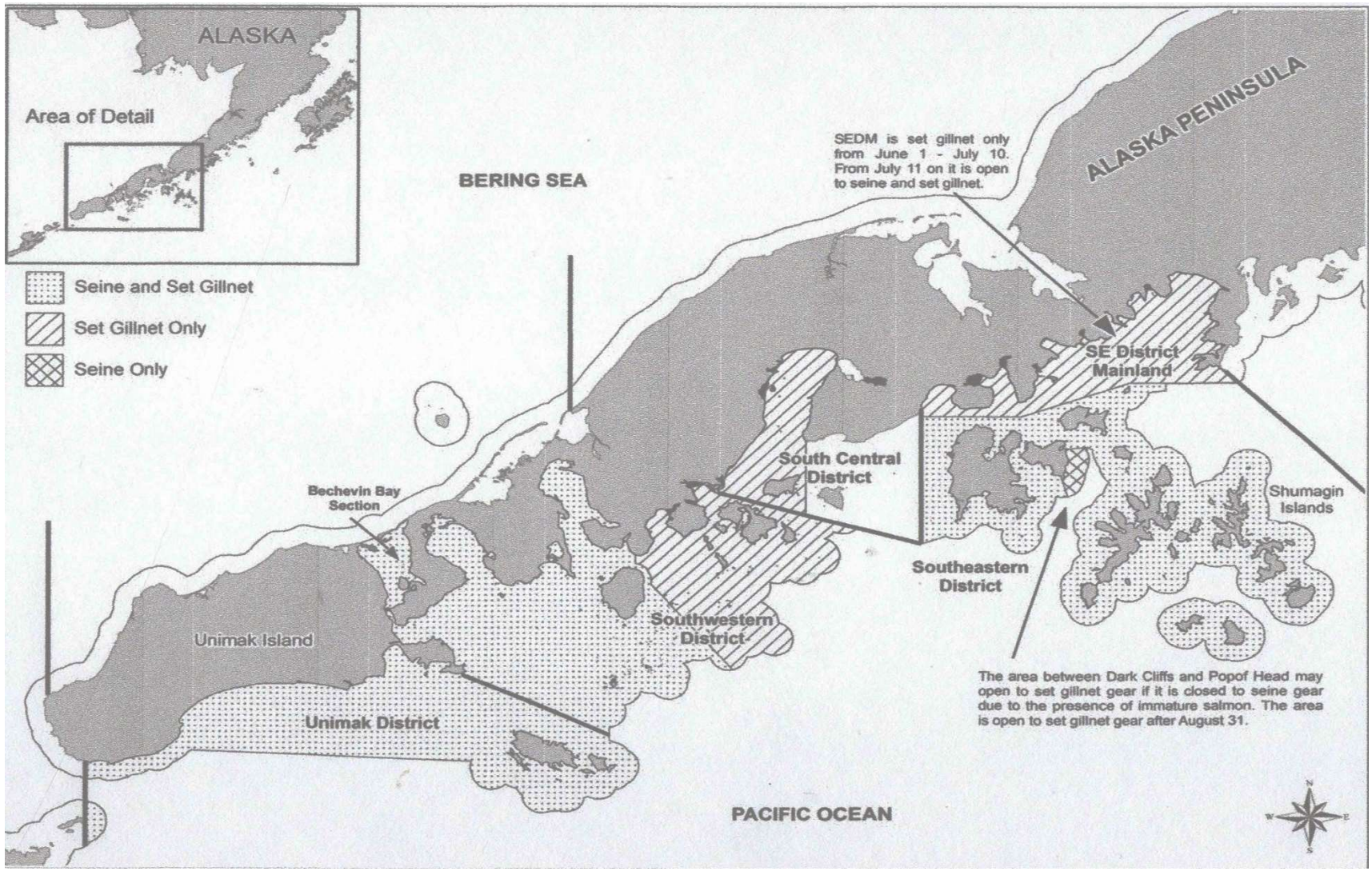

Figure 140-8. Map of the June South Alaska Peninsula fisheries currently allowed for set gillnet and purse seine gear, 2022.

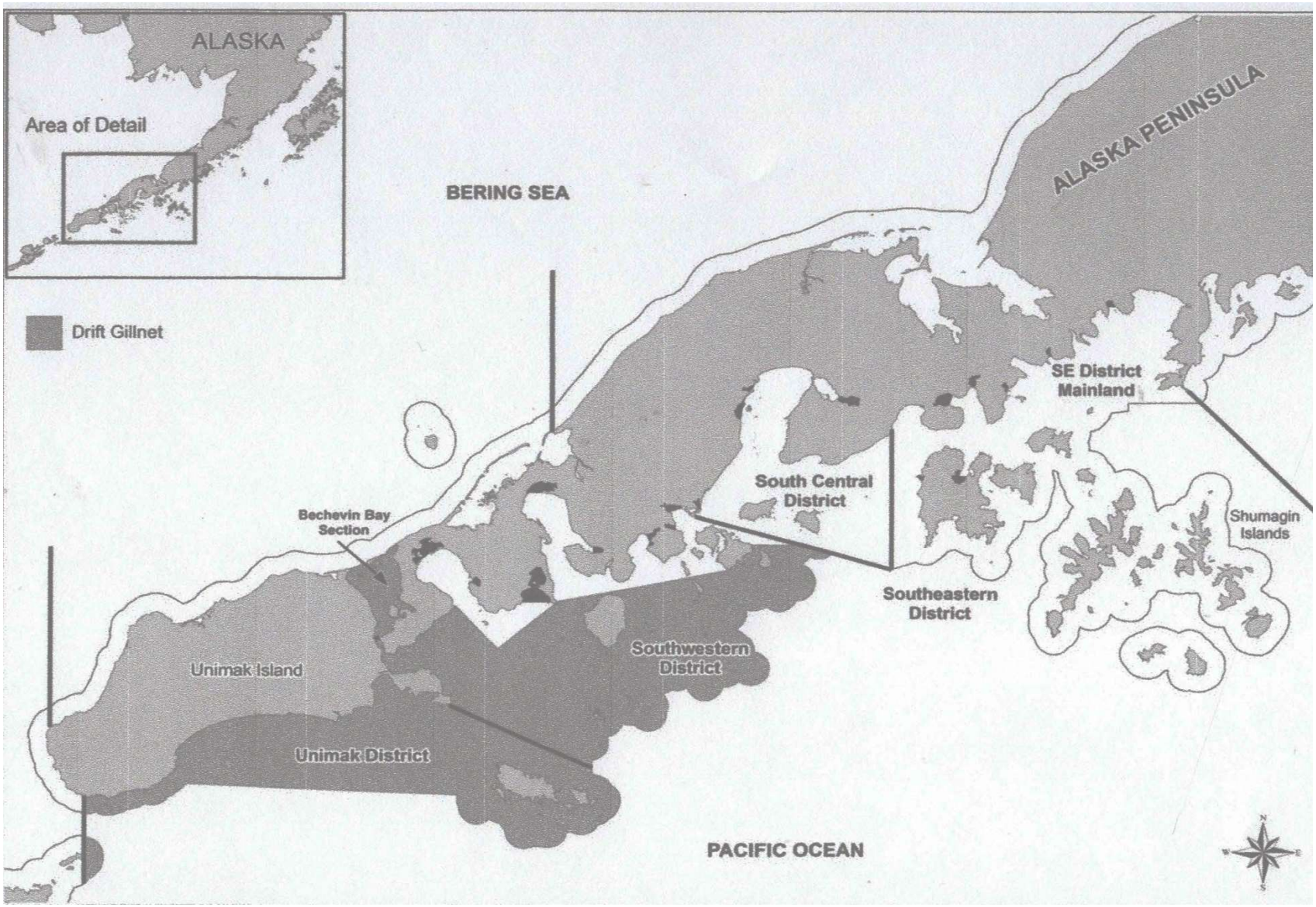

Figure 140-9. Map of the June South Alaska Peninsula fisheries for areas currently open for drift gillnet gear, 2022.

PC190

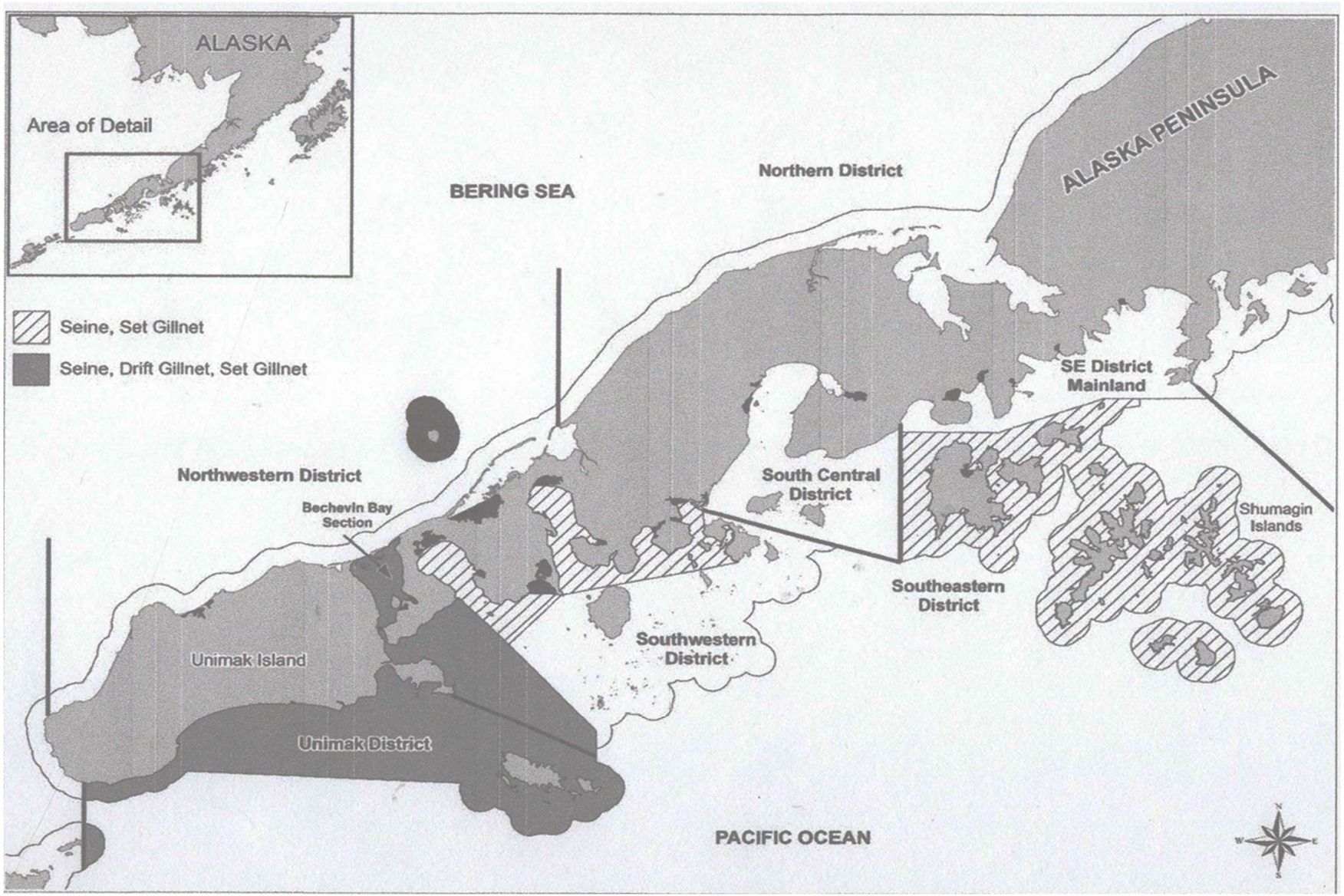

Figure 140-10. Map of the June South Alaska Peninsula fisheries for areas proposed (Proposal 140) for set gillnet, drift gillnet and purse seine gear, 2023.

PC190

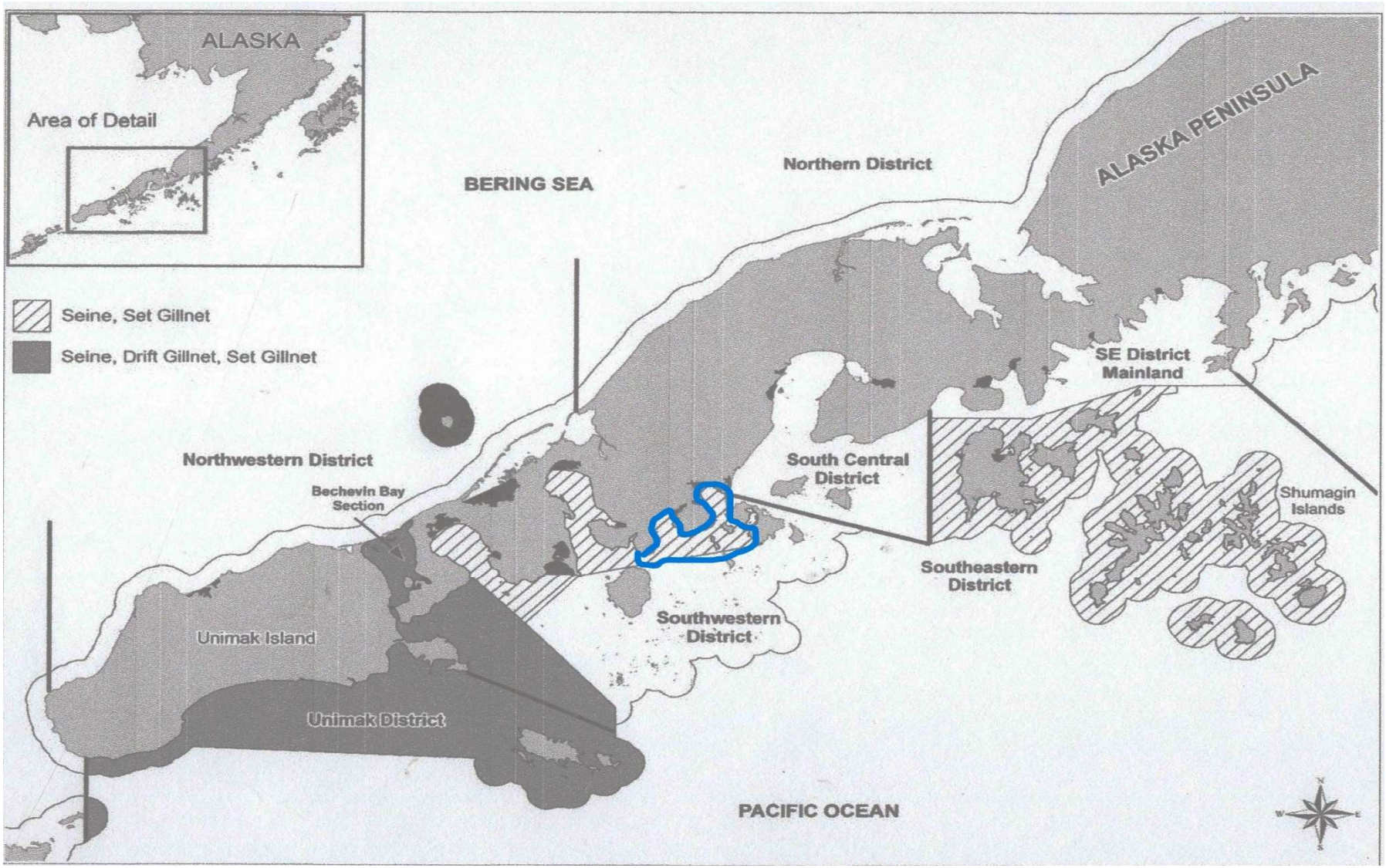

Figure 140-11. Map of the June South Alaska Peninsula fisheries for areas proposed (Proposal 140) for set gillnet, drift gillnet and purse seine gear with a modification that seeks to modify Proposal 140 to close the outlined area to seine gear, consistent with current regulations, 2023.

PC190

Because of all the reasons cited above, YDFDA strongly supports Proposal 140, especially the time restrictions on the South Alaska Peninsula June fisheries. We also support the less restrictive time for the set gillnet gear type because this gear harvests a small portion of the Chum salmon during the June fishery. The recent 10-year (2012-2021) average percent harvest by set gillnet gear for Chum and Chinook salmon is very low, ranging from 1.1% for the Chum salmon harvest in the South Unimak June fishery, to 5.7% for the Chum salmon harvest in the Shumagin Islands June fishery. The average percent harvest by set gillnet gear for the Post June Chinook salmon harvest is 2.2% (Fox et al. 2022).

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PC190

Proposal 141

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.

PROPOSED BY: John H. Lamont Jr.

Purpose: Amend the South Unimak and Shumagin Islands June Salmon Management Plan to require the department to manage the June fishery by emergency order to close those areas within the management plan. Amend **5 AAC 09.330. Gear.** to allow other gear types to be used in the commercial fishery. Fishing season and periods would be operated by Emergency Order in Area M during the month of June OR Selective gear types (Seines, Dip Nets, Hook and Line and other gear types) that can selectively harvest sockeye releasing all other types of salmon bound for Arctic, Yukon and Kuskokwim areas may be used to harvest sockeye salmon.

What would be the effect if this proposal were adopted? ADF&G: *It is unclear what the effect would be if the proposal was adopted. Targeted fishing for sockeye salmon in the South Alaska Peninsula June fishery and disallowing the harvest of king, chum, and coho salmon is the intention of the proposal. It appears this proposal would allow various gear types to harvest salmon but does not specify when or which gear would be used. Use of selective gear types would significantly reduce salmon harvest (ADDF&G 2023).*

Rationale by Proponent:

- Request that the Alaska Board of Fish limits the number of AYK bound Salmon (Chinook, Chum and Coho) that can be incidentally harvested in the Aleutian Islands/Shumagin Islands/Alaska Peninsula area OR
- close the Area M fishery for the month of June.
- Reason is: Indigenous Peoples on the Yukon River are not allowed to harvest ANY OF THESE SALMON for sustenance that this area freely harvests commercially on their way to their spawning grounds AND
- spawning escapement for these salmon stocks are not being met.

ADF&G RECOMMENDATION: NEUTRAL (allocative)

The department is NEUTRAL on this proposal. However, the department does not have the ability to differentiate which salmon are bound to AYK and would require guidance on the gear type allocative aspects of this proposal.

YDFDA RECOMMENDATION: OPPOSE

This proposal seeks to either have the June fishery opened and closed by emergency order or closed during the month of June. YDFDA suspects that the proposer seeks to limit the time the fishery operates. While YDFDA supports a reduction in time in this fishery, we support the time and area limitations on the fishery proposed in Proposal 140. YDFDA does not support the use of selective gear in this fishery.

Selective gear, dipnets and beach seines, have worked on the Yukon and Kuskokwim Rivers because there are no other options to harvest one species of salmon and a allow other species to be released alive. The reality is the fishermen fish with selective gear, or they don't fish. However, all selective gear, currently used on the Yukon and Kuskokwim are very inefficient

gear compared to gillnets. Gillnets are not selective gear. So, under this proposal gillnets would not be allowed as legal fishing gear if this proposal was to be carried by the Board of Fisheries.

Small purse seines have been used in test fisheries in District 1 of the Yukon Area and have proved to be an effective selective gear for harvesting Chum salmon while allowing the live release of Chinook salmon. Proposal 126 was submitted to the Board of Fisheries in 2016 to allow small purse seines as a selective gear on the Yukon River. This proposal failed (2-5) because of the concern that operators would not be careful enough to allow for the live release of Chinook salmon from the seine. Because the seines are so much larger in the South Alaska Peninsula fisheries and catch much larger numbers of fish that were caught in the YDFDA test purse seine fishery, we believe that it would be difficult for fishermen to live release non-target salmon species. Additionally, crowding many fish in a purse seine after it is closed probably causes harm to all the fish in the net. YDFDA believes it is not practical to restrict this fishery to selective gear with the stipulation that all non-target salmon species be released.
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South Alaska Peninsula Salmon Management

PC190

2 Proposals: Proposals 148-149

All proposals for South Alaska Peninsula Salmon June Management Plan (*PDF 227 kB*)

Proposal 148

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.
5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.
5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Purpose: Amend a suite of management plans to reduce commercial fishing time in the South Alaska Peninsula area: Based on Yukon and Kuskokwim preseason forecasts, if the lower bound of escapement goals are projected to not be met in one or both rivers, then fishing time would be reduced by 50% in the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365), the Post-June Salmon Management Plan for the South Alaska Peninsula (5 AAC 09.366), and the Southeastern District Mainland Salmon Management Plan (5 AAC 09.360). In addition to time restrictions, fishing area should be modified to reduce catch rates in areas where Chinook and Chum salmon are abundant and gear restrictions employed that may also reduce catch rates of Chinook and Chum salmon specifically. Based on Yukon and Kuskokwim inseason management tools if the first inriver test fisheries and sonar fish passage monitoring projects confirm low Chinook or Chum salmon returns then the post-June South Alaska Peninsula Management Plans will be further reduced in fishing time and area and gear restrictions will be in order to support sustainable passage of all Yukon and Kuskokwim Bound Chinook and Chum salmon

What would be the effect if this proposal were adopted? ADF&G: *Reduce fishing time by 50% in the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365), the Post-June Salmon Management Plan for the South Alaska Peninsula (5 AAC 09.366), and the Southeastern District Mainland Salmon Management Plan (5 AAC 09.360), if the lower bound of escapement goals are projected to not be met in either the Yukon or Kuskokwim Rivers, based on preseason forecasts. Additionally, modify areas open to fishing and implement gear type restrictions to reduce harvest of king and chum salmon (ADF&G 2023).*

Rationale by Proponent:

- During the March-April 2022 Board meeting, the RC 104 captured the language to be evaluated as a management plan to protect the Chignik River Early-Run Sockeye Salmon stock by enacting restrictions to allow salmon to pass through those fisheries. That Board action and intent is parallel to the intent of this proposal.
- This framework represents the management tools the ADF&G may utilize to manage the South Alaska Peninsula Management Area (Area M) commercial salmon fisheries to reduce take of fish bound to other watersheds.
- Parallel restrictions are to conserve Yukon and Kuskokwim Chum and Chinook salmon during this time of low abundance.
- the Yukon and Kuskokwim Chinook Salmon returns have been severely depressed for over ten years and escapement goals on both rivers have not been met in recent years.

- The catastrophic Chum Salmon crash in 2021 resulted in severe subsistence harvest restrictions on the Kuskokwim River and complete closure to any salmon harvest on the Yukon River and still escapement goals were not met.
- Every single salmon is now needed to make it to the spawning grounds.
- Area M commercial fishery restrictions are necessary. These mixed-stock, intercept fisheries need to be sustainably managed by ADF&G to help meet Chum and Chinook salmon escapement goals on the AYK Rivers.
- The State of Alaska is also charged with Canada Yukon Salmon treaty obligations and that management authority should extend to sustainable management of all fisheries managed by ADF&G that catch Yukon bound salmon.
- This proposal is being submitted to reduce the interception of AYK Chinook Salmon stocks, which have been identified by ADF&G as Stocks of Yield Concern.
- Equal burden of conservation efforts should be applied throughout the range of these critically low Yukon and Kuskokwim salmon stocks.
- During times when subsistence fisheries are severely restricted or closed entirely on these rivers due to low salmon returns, we request the Board adopts a modification of the existing regulations in a way that the Area M commercial salmon fisheries equally share the burden of conservation through the restrictions of equal magnitude.
- The intent of this proposal is to ensure all user groups managed by the State of Alaska are restricted from take of AYK stock of origin salmon during times while there are stocks identified by regulation as Stocks of Concern due to critically low returns.
- If the regulations remain unchanged, then salmon essential to meeting escapement goals in these AYK rivers will continue to be harvested in Area M unabated and escapement goals, Treaty obligations, and basic subsistence salmon needs and mandated State and Federal subsistence priorities will not be met.
- All other solutions to ensure every salmon needed to meet Yukon and Kuskokwim rivers Chinook and Chum salmon escapement goals are already being applied via complete closures to the harvest of any salmon on the Yukon River and Coast and severe subsistence fishing restrictions in place on the Kuskokwim River. And of course, the inriver commercial fisheries have already been closed completely as well.

ADF&G RECOMMENDATION: NEUTRAL (allocative)
The department is NEUTRAL on this allocative proposal.

YDFDA RECOMMENDATION: SUPPORT WITH MODIFICATIONS TO THE JUNE MANAGEMENT PLAN.
OPPOSE CHANGES TO POST-JUNE AND SEDM MANAGEMENT PLANS

YDFDA supports the portion of the proposal that addresses the South Alaska Peninsula June fishery. However, YDFDA does not support the reduction in time in the Post-June fishery or the fishery that occurs in the SEDM at this time. Those fisheries do not harvest many CWAK-bound Chum salmon. However, it is unknown if they harvest AYK-bound Chinook salmon or other Chinook salmon stocks returning to Bristol Bay or Cook Inlet, or if they are local stocks. The Board should be concerned regarding the recent increases in the Chinook salmon harvest during in the Post-June fishery (Figure 148-1). As in Proposal 140, YDFDA recommends that a genetic study be initiated on the total South Alaska Peninsula fishery harvests to determine stock-

specific origins of Chinook salmon harvested in these fisheries. YDFDA suggest that a variation of this proposal, specific for the June Management Plan, with a reduced percent decrease in time or a sliding scale, be coupled with Proposal 140 to further restrict fishing time, if necessary, in the South Alaska Peninsula June fishery to address additional conservation measures for critically low AYK salmon runs.

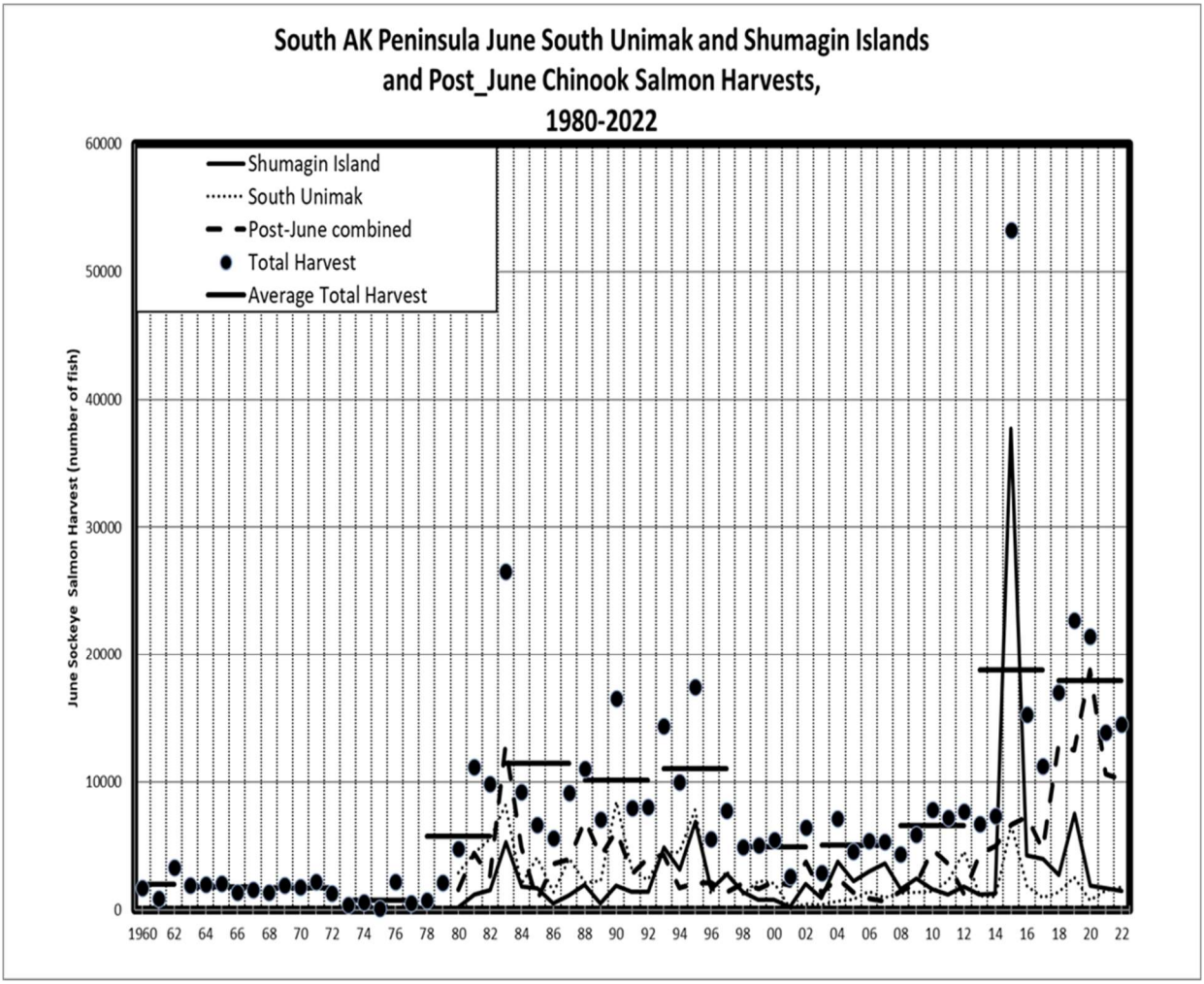

Figure 148-1. South Alaska Peninsula June (South Unimak Island and Shumagin Islands) and Post-June Chinook salmon harvests, 1980-2022.

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PC190

Proposal 149

5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan.
5 AAC 09.366. Post-June Salmon Management Plan for the South Alaska Peninsula.
5 AAC 09.360. Southeastern District Mainland Salmon Management Plan.

PROPOSED BY: Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

Purpose: The purpose of this proposal is very similar to the purpose of Proposal 148, by the same author. Much of Proposal 149 is the same as Proposal 148. It seems to be a place holder for the proposer to submit additional prescribe restrictions to this fishery after further analysis of data. Below are additions to Proposal 148:

In addition to the purpose in Proposal 148, the proposer request that Alaska Department of Fish and Game implement a genetic testing program for the Area M commercial fisheries to identify stock of origin for effective management of Arctic-Yukon-Kuskokwim Chinook and Chum salmon. Genetics data will aid in development of avoidance measures to ensure passage of Arctic-Yukon-Kuskokwim bound salmon.

What would be the effect if this proposal were adopted*?* *In years when king and chum salmon escapement goals were not projected to be met in the Yukon or Kuskokwim Rivers, fishing time would be reduced by half for all gear types throughout the season from June 1 through October 31 in all areas open to commercial fishing under current management plans. Additionally, unspecified areas could be closed to commercial fishing and restrictions to gear types could be made. A genetics sampling program would also be implemented for king and chum salmon harvested in the Alaska Peninsula Area which would incur costs for the department (ADF&G 20232).*

Rationale by Proponent:
(same as Proposal 148)

ADF&G RECOMMENDATION: NEUTRAL. (allocative)
The department is NEUTRAL on this allocative proposal. The board does not have authority to direct the department to implement a genetic sampling program.

YDFDA RECOMMENDATION: SUPPORT WITH MODIFICATIONS TO THE JUNE MANAGEMENT PLAN:
OPPOSE CHANGES TO POST-JUNE AND SEDM MANAGEMENT PLANS;
(see recommendations for Proposal 148)

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PC191

YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

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www.yukonsalmon.org ♦ serena@yukonsalmon.org

"Protect and Promote All Wild Fisheries and Traditional Cultures within the Yukon River Drainage"

October 19, 2022

Dear Board of Fisheries members,

The Yukon River Drainage Fisheries Association (YRDFA) is a recognized 501 (c)(3) non-profit association of subsistence and commercial fishers with the mission of protecting and promoting all healthy fisheries and cultures along the Yukon River drainage. This longest salmon migration in the world provides critical dietary and cultural support for over 50 rural Alaskan villages and a dozen First Nations communities in Yukon Territory, Canada. YRDFA was created in 1990 to conserve Yukon River salmon runs by giving a voice to the people who have used and managed the resource for thousands of years. Our work has become an essential part of the communications between fishers and fishery managers in the region.

YRDFA represents village fishers at important state, federal, and international decision-making tables, works to document and utilize Traditional Ecological Knowledge in fisheries management, and strengthens the long-term viability and sustainability of Yukon River communities through preserving subsistence and commercial fisheries.

The issue we are focusing is on the salmon crisis in the Arctic-Yukon-Kuskokwim. A steady, multi-decade salmon decline on the AYK has been marked with periodic chum and Chinook stock crashes, culminating in a season of record loss in 2021 for chum salmon and a 2022 record low for Chinook salmon for the Yukon River. With zero commercial or subsistence harvest of Chinook or summer chum on the Yukon this year, and many stocks below needed escapement, we are looking for a statewide collaboration to examine and address issues impacting the health of these iconic stocks. This is a critical matter of well-being in our region, impacting the health of our food systems, livelihoods, family structures, cultural traditions, and more. While the AYK is currently in cycle, we would like to call the board's attention to opportunities to discuss and address this crisis in the coming meetings.

YRDFA along with the concerned persons and entities below have agreed to support the Board of Fisheries proposal #140 5 AAC 09.365. South Unimak and Shumagin Islands June Salmon Management Plan. Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce the commercial salmon fishing time that is outlined in the proposal.

Sincerely,

PC191

Executive Director
YRDFA

Signature	Print Name	Organization or self
	Sylvia C Joseph	self
	Raymond J. Joseph	self
	Francis Thompson	self
	Theresa Clark	YRITWC Self
	Oscar Evan	Self
	Mearle Brown	Self
	Martin M. Nicolai	Kwethluk, Inc.
	John H. Lamont	Self
	Tiffany Andrew	self
	Diane Agayar	YDFDA
	Max Agayar	self
	Elizabeth Dubovsky	self
	Polly Carr	self.

Signature	Print Name	Organization or self
	Darren Paystak	self
	GEORGE BEANS SR	Yupiit of ANDREAFSKI TRIBE
	Julia Weiser	self
	Charlie Wright Sr	
	Paul Fancyboy	Self
	Don Steven	TCC
	Cynthia Fancyboy	Pilot Station Trad. Village
	Vera Weiser	Self
	William Riley Jr	Pitka's Point Tribe
	Josh Weiser	Self
	Victor W. Lord	NVA
	Kathleen Demientieff	NNC/YRITFC
	BRIAN Ridley	TCC/Eagle
	Catherine Moncrieff	self
	Karen Gillis	self

PC191

YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

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February 6, 2023

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o Alaska Department of Fish and Game
1255 W. 8th Street
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairwoman Märit Carlson-Van Dort,

The Yukon River Drainage Fisheries Association (YRDFA) is a recognized 501c3 non-profit association of subsistence and commercial fishers with the mission of protecting and promoting all healthy fisheries and cultures along the Yukon River drainage. This longest salmon migration in the world provides critical dietary and cultural support for over 50 rural Alaskan communities and a dozen First Nation communities in the Yukon Territory, Canada. YRDFA was created in 1990 to conserve Yukon River salmon runs by giving a voice to the people who have used and managed the resource for generations. Our work has become an essential part of the communication between all stakeholders on the Yukon River.

We would like to raise attention to the issue of critically low salmon returns to the Bristol Bay, Arctic, Yukon, and Kuskokwim regions of Chinook and chum salmon. A steady, multi-decade salmon decline in the AYK region has been marked with periodic chum and Chinook stock crashes, culminating in a season of record loss in 2021 for chum salmon, following record low returns on Chinook salmon in 2022. With zero commercial and subsistence harvest of Chinook or chum salmon on the Yukon River for three consecutive years, the State of Alaska cannot stand by and do nothing in hopes the salmon abundance will ‘bounce back’. A conservative effort between all users of salmon that infiltrate the run size from the time they spawn, migrate to seas, and return to the streams, must be managed by escapement.

YRDFA members and community members across the Yukon River drainage have continued to experience not only the loss of salmon but familial and cultural practices that come with the

salmon run. Loss of fish camps and community gatherings around salmon has spiked in the three years since complete closure has been enacted. YRDFA and its members over the past three years have understood the burden of conservation with the closure of multiple salmon fisheries on the Yukon River. Yukon River members believe that although there is importance in supporting the commercial fishery, there needs to be a more equal share in the conservation burden of salmon fishery restrictions in order to protect Yukon River chum salmon and support people of the Yukon River.

Both our Tribes' local and Traditional Knowledge and the best available Western scientific genetic information confirm that significant numbers of chum salmon harvested in the South Alaska Peninsula (Area M) June fishery originated in Western Alaska. While Proposal 140 does not completely close commercial fishing in the Alaska Peninsula Area M, it creates opportunities for the salmon to get by and travel to their spawning grounds, thereby increasing conservation of these declining species and creating due equitable balance through these measures.

The Yukon River Drainage Fisheries Association **supports the passage of Alaska Board of Fish Proposals #140 in its entirety.** We support this proposal to limit this unrestricted fishery in order to protect these chum stocks amidst severe, unprecedented decline, and to call upon Alaska Department of Fish and Game (ADFG) to implement in-season, real-time genetic sampling and analysis of Area M chum salmon harvests with further discussions of mitigation strategies.

We cannot control the warming waters or the diseases in the fish. For decades the people of Western Alaska have been voicing their concerns and they have grown tired, which is resulting in anger and distrust in the management of our resources. We at Yukon River Drainage Fisheries Association join many other organizations across the state in support of this proposal.
You, as the governing body of our salmon resources, have the control to make these tough decisions and to make the choice that would benefit the State as a whole.

Sincerely,

Serena Fitka
Executive Director

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 134: Support **Proposal 139:** Support **Proposal 140:** Support

PC192

Submitted by: Yukon River Inter-Tribal Watershed Council

Community of Residence: ANCHORAGE

Comment: The Yukon River Inter-Tribal Watershed Council supports Proposal 140 for the South Unimak and Shumagin Islands June Salmon Management Plan. This proposal is important to the Yukon River basin communities. Chinook Salmon and Chum Salmon caught during this commercial fisherie are destined for the salmon spawning grounds in the Yukon, Kuskokwin and centeral and northern Alaska rivers. The treaty between Alaska and Canada have not been met for over the past three years and residents have not been able to fish for these salmon species to put food on the table. The Alaska Constitution Article VIII, Section 15 states: No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood and to promote the efficient development of aquaculture in the State. Commercial fishing in Area M is creating an economic distress and our Yukon River communities residents who have been dependent upon this fishery as a food source since before Statehood have not been able to fish for the past three years. The passing of this proposal is imminent for the survival of Chinook and Chum salmon that are not reaching these rivers.

Thank you.

Theresa Clark

Executive Director

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 140: Support

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Yukon-Kuskokwim Delta Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll-Free: 1-800-478-1456

In Reply Refer To:
RAC/YK.22142.BM

DEC 28 2022

Art Nelson, Executive Director
Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Mr. Nelson,

I am writing to you on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to provide the Council's comments on four Alaska Board of Fisheries proposals that will be discussed at upcoming 2023 meetings.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Yukon-Kuskokwim Delta Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 27-28, 2022, in Bethel. Among the items discussed were various proposed changes to State of Alaska fishing regulations. The proposals that the Council discussed, and our positions and comments, are listed below by regional meeting.

Arctic / Yukon / Kuskokwim Finfish

Proposal 80 - Restrict subsistence king salmon harvest in the middle and upper Yukon River. The Council **supported Proposal 91 with a vote of 7-0, with one member abstaining**. The Council supported this proposal because they feel that lower Yukon River fishing districts have been unfairly restricted in the past while upper river districts were allowed more

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opportunity.

Proposal 90 - Create a Tier II subsistence king salmon fishery in the Kuskokwim River. **The Council voted to unanimously oppose Proposal 90.** The Council does not support this proposal because subsistence fishers should not be more heavily regulated under a Tier II system while commercial fishers in the Alaska Peninsula continue to intercept our salmon stocks for profit. This is unjust and does not adhere to the subsistence priority. By law, restrictions should be put on commercial fisheries before subsistence fisheries.

Proposal 91 - Modify Kuskokwim Area lawful gear and gear specifications and operation to provide greater opportunity to harvest salmon other than king salmon, during times of salmon conservation. The Council **supported Proposal 91 with a vote of 7-0, with one member abstaining**. The Council supports this proposal because it would give managers the tools needed to allow targeted fishing opportunities for other species of salmon during times of Chinook Salmon conservation. It will potentially increase subsistence harvest opportunity and help people better meet their subsistence needs while still protecting Chinook Salmon stocks.

Alaska Peninsula / Aleutian Island / Chignik Finfish

Proposal 140 - Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time. The Council voted to **unanimously support Proposal 140 with a modification that commercial fishing is prohibited beyond a distance of three miles from shore**. The Council supported this proposal with modification because there is a major conservation concern for Western Alaska salmon that are intercepted in these commercial fisheries. Subsistence fishing has been closed for several years on the Yukon and Kuskokwim rivers, while commercial fishers have been allowed to harvest the same stock of concern. This does not adhere to the subsistence priority nor sustainable management practices. By law, restrictions should be put on commercial fisheries before subsistence fisheries. In supporting the modification, the Council seeks to limit the commercial fishers in the South Unimak and Shumagin Islands to the same geographical restrictions faced by commercial and subsistence fishers in the Yukon-Kuskokwim Delta region, that is, limited to fishing within three miles from shore.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@fws.gov.

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Sincerely,

Raymond Oney
Chair Regional Advisory Council
Yukon/Kuskokwim Region

cc: Federal Subsistence Board
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council Members
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record

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Proposal 140: Support With Amendments