

February 2, 2026

Greetings Madam Chair and Esteemed Members of the Board,

My name is Patrick Brown and I am the Chairman of the Sand Point Advisory Committee. The Sand Point Advisory committee is made up of 6 members. We are primarily commercial fisherman, but we are also hunters and subsistence users. Our members are involved in many Commercial fisheries, but salmon fishing is by far the most important. We live in a remote area which is rich in natural resources, including some of the best salmon feeding and spawning grounds in the world.

I represent commercial and subsistence users who reside in the City of Sand Point. Our population is about 578 people according to 2020 Census. This is down from 976 residents in 2010. We live on a small volcanic island that is less than 50 square miles in area. There are limited other industries available in our community, but our unique position at the northern end of the largest body of water in the world is something that has kept our people here. Our community members are seiners, set netters, and drifters who navigate the high seas. Salmon is the lifeblood of our economy and our livelihood. Although there are other opportunities for commercial fishing, without commercial salmon fishing, our town would largely cease to exist.

We Oppose Proposals 127, 128, 129, 130, 131, 132, 133, and 136, which aim to destroy the very core of our way of life. The Area M June fishery as we know it would be decimated and returned to the time between 2001 and 2003, when our June schedule was similar to these proposals, and was nearly non-existent. Our fishery has operated successfully for the past 22 years with minimal impact and fairly low chum harvests overall. During the last Board cycle, we were met with new regulations that removed time and area, and put in triggers to effectively halt fishing and remove openings if large catches of chum occurred. In addition, the seine fleet as a whole, has had voluntary stand down measures enacted to halt fishing and announce closures in certain areas as necessary. With the availability of satellite communications, we are able to communicate freely across the entire area. As you can see from the results of the past 3 years, chum catches in the June fishery have been down, and we haven't even hit any of the triggers as a result of voluntary efforts and fleet adaptability plans.

Area M June Chum Harvest

2025 - 156,136

2024 - 450,839

2023 - 205,522

2022 - 549,085

2021 - 1,169,631

2020 - 490,128

2003-2019 Average June Chum Harvest - 409,565

From 2003 - 2016, the seine, drift gill net, and set gillnet fisheries operated with 416 hours of fishing time between 5 openers in June. During this time, seiners self regulated with mandatory closures and voluntary stand downs. Beginning in 2017, drifters and seiners lost 64 hours of fishing time for the month of June, and were left with 4 - 88 hour openers, totaling 352 hours. Beginning in 2023, the maximum allowed hours for seiners has been 310 hours, between 4 openers. This is not including the amount of time lost between voluntary stand downs, self-imposed mandatory closures, and Emergency Order shut downs that occurred when Chignik systems had not yet reached their escapement goals.

Chum returns to CWAK from the time period between 2003 and 2019 remained relatively strong throughout the prosecution of our Area M June salmon fishery, at least, that is, until 2020. In 2020, something changed. Strong evidence suggests environmental anomalies occurred between the years of 2016 and 2019 in the Bering Sea, with higher than normal water temperatures across the Western Alaska coast. This affected the smolts leaving their natal streams, where they encountered harsh climates and a lack of food. ("AYK Chum Salmon Marine Research Overview," Dr. Howard, 2023) According to the "Yukon Management Area Annual Report," of 2021,

the 2021 season was predicted to be below average based on the parent years, which would have been the years 2015-2018. (FMR No. 22-29, Ransbury et al, p.17),

Bristol Bay Chum Harvest (SEG 200,000)

2025 - 532,342

2024 - 509,223

2023 - 341,504 (4th lowest on record, SEG not reached)

2022 - 303,479 (3rd lowest on record, SEG not reached)

2021 - 212,250 (lowest on record, SEG not reached)

2020 - 292,890 (2nd lowest harvest on record)

2019 - 1,394,155

20 year Average 2000-2019 - 1,106,191 chum harvest

Yukon Summer Run (SEG - 500,000- 1.2 million)

2025 - 347,146

2024 - 758,000

2023 - 845,988

2022 - 463,806

2021 - 153,718

2020 - 692,602

2019 - 1,402,925

Yukon Fall Chum (SEG - 300-600,000)

2025 - 341,439
2024 - 246,665
2023 - 370,015
2022 - 325,717
2021 - 146,197
2020 - 262,439
2019 - 842,041

As you can see, the Bristol Bay fishery has equally been affected by low chum returns in the years described. Bristol Bay, which is known to harvest more than 1 million chums per year, fell short between the years of 2020-2025, when the Bay harvested about half to a quarter of what they normally harvest. Additionally, SEGs for chums were not met in 3 of the 6 years.

It's worth noting that the largest Sockeye salmon run in the world only has a Chum SEG of 200,000 fish, and harvests regularly in excess of 1 million fish. That's a 500% surplus. That's a really good return on any system. Let's use Bristol Bay sockeyes as an example. In 2024, Bristol Bay exceeded its escapement at just under 20 million fish. Harvest of over 31 million fish was higher than projected. Thus, a 150% return on surplus is considered a good thing.

In reality, mixed stocks of AYK chums are being harvested in Bristol Bay, bound for further up the coast. And their low harvests in

the past 5 years are indicative of lack of AYK chums migrating past their rivers.

We Support Proposal 134, which The Area M Seiners Association introduced, which would reinstate the former fishing schedule previous to 2023, of 4 equally spaced apart 88 hour openers during the month of June, from June 10-28. The AC supports this proposal as it allows time opportunities to fishermen in a climate where mandatory stand downs are the new normal. With the enactment of chum triggers for every opening, time is needed to find or wait for higher sockeye salmon ratios to harvest. Loss of time needs to be recouped, and utilized wisely.

We Support Proposals 119, 121, 122, 123, and 124, which would be beneficial to South East District Mainland (SEDM) user groups, particularly set netters. Historical sites in this area have not been utilized for many years due to low runs, but also because archaic allocative rules that border on discrimination of user groups. In 2023, Chignik harvested over a million sockeye, and SEDM didn't get to catch any of the allocation. There is a lot of restrictive language in the regulations that make it easier for the Department to not allow openers. Having a 600,000 minimum harvest is particularly restrictive as commercial efforts have waned in years and the fleet has shrunk.

We Oppose Proposal 120, which seeks to push seiners out of the SEDM until July 25. We barely get time or opportunity to harvest allocation as it is.

We Oppose Proposal 126 which seeks to impose restrictions on the Dolgoi Islands area, and add it to the the SEDM Management Plan. This area already has its own Management plan which, though restrictive in nature, is not as restrictive as the SEDM Management Plan, which has only offered openers in 1 year out of the past 8. In 10 of the past 25 years, we had no fishing opportunities in the SEDM. In about 2/3 of the past 25 years, we weren't even allowed opportunities to reach our 7.6% allocation.

The Chignik Management Area experienced a string of bad escapement and harvest years between 2018 - 2022. Scientific evidence shows that during that time in the Gulf of Alaska between 2013 and 2017, a mass which became known as "The Blob" had formed as a result of warm ocean conditions, and optimal growing conditions for pyrosomes, also known as sea pickles. There are resources which point toward environmental conditions in the Gulf of Alaska between the years of 2013 and 2017. These would have been the parent years leading up to the catastrophic run failure in Chignik.

These articles point toward environmental conditions in the North Pacific and Gulf of Alaska which are characterized by warming waters and the presence of tropical organisms in the area. During this time, there were massive die-offs of cod stocks, sea birds, as well as evidence that marine mammals were malnourished as a result of lack of available resources.

In the years leading up to the Blob, the Chignik Area (Area L) had a successful fishery, with healthy escapement and a healthy harvest. Nothing in this time has changed on either side of the line, until the run failure of 2018. What happened to the runs of 2018, 2020, 2021, and 2022 are anybody's guess. The quantifiable data does not point toward our fishery as having a large impact on Chignik stocks.

Chignik Escapement 2025

Chinook - 1391 (SEG 1300-2700)

Sockeye (Early Run) - 399,019 (OEG 300-400,000)

Sockeye (Late Run) - 659,246 (OEG 240-360,000)

Pink - 609,000 (SEG odd year 260-450,000) (even year 170-280,000)

Chum - 102,300 (SEG 45-110,000)

Sockeye Harvest - 823,419 (Comparable to 10 year average)

Chinook Harvest - 2,962

Coho - 50,940

Pink - 1,975,146

Chum - 86,649

37 Active Permits

Exvessel \$7,440,000

Average Permit \$201,081

Disaster Years - 2018-2022

Chignik caught 12,166 kings in 2024

Our AC supports Chinook salmon conservation. We support Proposal 135, which aims to create a new regulation to provide the Department “Emergency Order” authority to require non-retention of Chinook salmon and to amend the retention provision. With larger Chinook harvests in recent years, we want to encourage the conservation of a resource by allowing these fish to continue their journey and life cycle.

However, we Oppose Proposals 147, 148, and 152, which claim will reduce incidental catches of Chinook. There is little to no scientific evidence to back the claim that this gear reduction will meet the ends it intends to meet. In addition, it would incur costly and untimely gear rebuilds that will likely not be available before the next season.

We also Oppose Proposal 151, which would remove leads from set gill netters. Gill netters have always been allowed to use leads, and this will negatively impact the operations of set netters.

We Support Proposals 138, 139, 144, 145, in regards to the Post-June Management Plan. These are Proposals put forth by Local interests for the benefit of our fishery.

We Oppose Proposals 140, 141, 143, in regards to the Post-June Management Plan. These proposals come from outside interests with no stake in our fishery. They are ill-informed and misguided.

In summary, the Area M fishery is a unique fishery, much in the way that every fishery in Alaska is unique in its own right. Trying to impose the rules that people think should apply to our fishery is not the right way to do things. Bristol Bay has only gill net fishing and 32' boats and takes place in rivers. Chignik has only seining and mostly occurs in a lagoon, but also sometimes in the ocean. The Alaska Peninsula fishery is a combination of drift gill netting, set gill netting, and seining and only occurs in the ocean. The rules that have been developed for our fishery over the past 100 plus years are the way they are for a reason. Having one area say that their rules should apply to us is non-inclusive of our unique perspective.

The historical nature of our fishery and our area means that we are allowed a spot at the table. Our fishermen and women should not be excluded from Alaska's vast natural resources. Especially a resource that we and our ancestors before us have utilized. The Mixed Stock Salmon Policy guides our survival. The Constitution of the State of Alaska delegates that we cannot be discriminated against as stakeholders.

The June fishery is a part of what has sustained us. The Southeast District Mainland is a part of what has sustained us. Without these areas, we are doomed to failure. Without a seat at the table, we are doomed to table scraps.

Thank you for your time and consideration in deliberating these proposals.

Sincerely,

Patrick Brown
Sand Point AC Chairman

Sources Cited

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