

Board Of Fisheries

Madame Chair and members of the Board of fish

For the record My name is Frank Woods, 60-year-old life long Alaska Resident and Bristol Bay fisherman. I am here to represent myself.

I cant baffle you with Brilliance. So here is my testimony.

I'll ask you to consider Income by zip code Separates the poorest regions of Alaska to carry the burden of conservation. Whether right in there front door or thousands of miles away. This Board encourages communication between AC's , proposers, industry and Management not by asking communities to but heads and fight over resource. Process encourages , respect, cooperation and communication. We live in a great state where we are all equal and should be treated as such.

I support 110,147,148 and 152 anything which helps management by limiting catch rates and harvest in these mixed stock fisheries with incidental catch for stocks of concern. Fisheries disasters should be forefront of management we are beyond expanding fisheries.

I Strongly oppose 113,115,119-126, 134, 137-139,142,144-146,149,150,153 and 154 /188 which all increase fishing time , area and/or gear which has proven to catch kings and chums. Science hasn't fixed this issue for over 20 years ago when the commercial fisheries from the Kuskokwim were asked to dipnet commercially.

Comparing a terminal stocks management in Area T and comparing mixed stock dispersant fishery in Area M have very different opposite management strategy.

Managers use dispersant management when catching is good; they increase effort and can only estimate and control harvest and escapement and or passage after /not before. Daily harvest reports, delivery tickets rely on industry.

Oppose proposals 154 and 188

I oppose for the legal and regulatory purpose and any compromise or implementation increasing 7.5 % which goes against the constitution of the State of Alaska's in statue Article VIII (says maximum benefit) sections 2,3,4 sets sustainable yield principles. Giving legislative and Board directive setting this board for recourse. Once given it will be almost impossible to get back. 7.5 % is already legal for the Dutch Harbor proposed increasing additional 7.5 is 15%, NPFMC proposed 3%= 18% 25 to 30 % drop in the biomass estimate accounts for over 60 % before biomass hits the spawning shores of Togiak.

As recent as 2012 poor spawn on kelp in Togiak Bay has triggered the Togiak Ac and Village of Togiak to come to this board for Spawning and Subsistence zones. Which goes against of a maximum sustainable benefit to All Alaskans. These proposals only benefit a few if not one or two companies or individuals.

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(2013)-(2026) Comments . The Area M 2013,2015,2018,2023 and now 2026 BOF meeting had a lot mixed stock concerns presented. I stressed the management plan was inadequate and needed a peer review. With the genetics to back up the intercept of non-terminal stocks then the conservative approach was in order. **Burden of conservation is put on the poorest regions of the state and country.**

“So chum are the issue chums are targeted Chum cucking becomes a reality. Proposals 135 and 156 will be a common practice if passes and implemented for kings..

Area M intercept issues are the Same/More True and worst today. We have to move beyond an emergency order and species of concern. It's been beyond a anything normal we are facing the death of the biggest fishery in the world after disaster in the Nushagak, Y/K And Chigniks Kingsalmon collapses. This board and my generation do not want that legacy as to be remembered the face of death. The burden of conservation needs to be across the board. Science is great still hasn't solved this problem. This studies dilutes the margins as minimal impact I disagree with this methodology. Every fish is valued the streams they are destined for. Action from this board is required and mandated to protect the resource. Every fish matters in these disastrous returns statewide. I need to expand on these issues that are important history of these proposals are same issues even after disaster years change is coming and its unstoppable. Proposal 188 is alignment proposal to federal rule 50 CFR 135.25 that says you cannot manage regulate common sense.

2021-2025 reports say the Alaska Department of fish and game gave their excuse FOR 2.1 MILLION Area M wide and embarrassing South Peninsula catch of 1.6 million.

Board generated proposal 188

Some Phrases for use:

- Short-term market disruption should not trigger long-term reallocation of a forage species.
- Temporary non-participation is not the same as biological surplus.
- Unharvested' does not mean 'surplus with zero consequence.
- This proposal converts a temporary market shift into a permanent directed removal pathway.
- Herring are a connector species, losses ripple through salmon, seabirds, marine mammals, and subsistence users.
- Whole-fish removal fisheries have a fundamentally different biological impact profile than roe-focused fisheries.
- We should not convert a roe-focused local opportunity into a whole-fish export pathway without demonstrating no added risk to the forage base.
- When recent sampling and fishery-dependent data are thin, the prudent approach is not to expand directed removals.
- Even if this proposal looks small on paper, it lands on top of broader ecosystem and bycatch pressures.
- If market demand is shifting toward whole-fish product, that opportunity should first be available to the district of origin.
- If there is unused opportunity, the remedy should be local development, not exporting the fish to outside supply chains.
- Do not pre-allocate future local diversification to Dutch Harbor before Togiak has had a fair chance to rebuild and adapt.
- This is not a utilization fix, it is a structural reallocation.
- This proposal creates allocation creep and a one-way ratchet away from local benefit.
- The burden of proof should be on proponents to demonstrate biological surplus and show the proposal does not increase risk to the forage base, salmon

Narrative Opposing Proposal 188

Proposal 188 would allocate 15 percent of the remaining Togiak sac roe herring guideline harvest level to the Dutch Harbor food and bait fishery if the Togiak sac roe fishery does not achieve 90 percent of its guideline harvest level by May 31.

Response:

While proponents frame this as a practical solution to unused harvest, the proposal creates a long-term structural reallocation based on short-term market conditions, and it does so without demonstrating biological surplus or evaluating ecosystem risk.

The core problem is that temporary non-participation in the sac roe fishery is not a biological signal that herring are surplus. It is often the result of processing constraints, limited buyer participation, changing markets, timing issues, or uncertainty. “Unharvested” does not mean “surplus with zero consequence.” This proposal would convert short-term market disruption into a permanent directed removal pathway, effectively treating an economic condition as justification for new directed harvest.

This is particularly concerning because whole-fish food and bait fisheries have a fundamentally different biological impact profile than roe-focused fisheries. Whole-fish harvest removes forage biomass entirely from the ecosystem. Herring are a critical connector species, losses ripple outward through salmon, seabirds, marine mammals, and other predators, and they also affect subsistence users and food security across the region. In a period when Bristol Bay and surrounding areas are already experiencing broader ecosystem stress and king salmon return concerns, it is inappropriate to increase directed removals without strong scientific justification.

Additionally, this proposal contributes to cumulative pressure on herring stocks. Bycatch discussions and other external pressures are already affecting herring availability. Even if Proposal 188 appears modest on paper, it adds new harvest demand at a time when recent fishery-dependent sampling and data are limited. When the data are thin, the prudent approach is not to expand directed removals.

Finally, Proposal 188 creates a one-way ratchet that shifts benefits away from the communities most closely tied to the resource. If market demand is shifting toward whole-fish bait or food products, that opportunity should first be made available to the district of origin. If there is unused opportunity, the remedy should be local development, allowing time and capacity for communities such as Togiak to rebuild processing, markets, and participation, rather than exporting the fish to outside processing and bait supply chains.

For these reasons, Proposal 188 should be denied. At minimum, it should be deferred until a current biomass estimate and risk analysis are completed. If the Board considers adoption, it must include strict guardrails such as a sunset clause, a tightened trigger requiring a written biological surplus finding, and clear protections for food security and local economic development.

Useful for narrative development:

Strategic Opposition Phrases and Explanations

Proposal 188 – Togiak Herring

This document provides strategic phrases and plain-language explanations intended for use in written comments, oral testimony, coalition messaging, and briefing materials related to Proposal 188.

Strategic Phrases with Explanations

- Short-term market disruption should not trigger long-term reallocation of a forage species.

This point emphasizes that a decline in harvest participation is often caused by temporary economic conditions, processor availability, timing, or market fluctuations, not by a long-term change in the biological availability of the resource. Using short-term market disruption as the trigger for a permanent reallocation creates a long-term structural shift based on conditions that may correct themselves. For a forage species like herring, management should be precautionary and stable, not reactive to short-term market dynamics.

- Temporary non-participation is not the same as biological surplus.

When the Togiak sac roe fishery does not meet its guideline harvest level, that does not automatically mean the herring were left over in a way that is biologically safe to reallocate. It may mean the fishery did not occur due to lack of buyers, lack of processing capacity,

poor timing, weather conditions, or uncertainty in run strength. A management plan should not assume that unharvested allocation represents surplus fish that can be safely removed without consequence.

- “Unharvested” does not mean “surplus with zero consequence.”

This phrase highlights the difference between fish that are not caught and fish that are truly surplus to ecosystem and subsistence needs. Herring that remain in the water contribute to spawning success, ecosystem productivity, and predator food availability. Treating unharvested as wasted ignores the ecological role herring play, and it treats the absence of a commercial harvest as a justification for increased removals, even though the fish remaining in the water still provide value.

- This proposal converts a temporary market shift into a permanent directed removal pathway.

Proposal 188 is triggered by failure to achieve a sac roe harvest target, which may occur because of temporary market or processing shifts. Instead of allowing time for markets to recover or for local fishery participation to rebuild, the proposal automatically reallocates a portion of the guideline harvest level to a separate directed fishery. That creates a permanent pathway for harvest that is not tied to demonstrated biological surplus, and it shifts the long-term structure of allocation away from local opportunity.

- Herring are a connector species, losses ripple through salmon, seabirds, marine mammals, and subsistence users.

Herring occupy a central position in the marine food web. They transfer energy from plankton to larger predators, including salmon, seabirds, marine mammals, and other fish. When herring biomass is reduced, the impacts can extend far beyond the herring fishery itself. This is particularly important in Bristol Bay, where ecosystem productivity and salmon returns are critical to subsistence and commercial economies. Managing herring conservatively is not only about herring, it is about protecting the broader ecosystem.

- Whole-fish removal fisheries have a fundamentally different biological impact profile than roe-focused fisheries.

A whole-fish food and bait fishery removes herring entirely from the system, reducing spawning potential and forage availability. Roe-focused fisheries are often more limited in season, market-dependent, and can be managed differently because they are tied to specific timing and processing needs. Converting allocation from a roe-based opportunity into a whole-fish removal fishery increases the biological impact of the harvest. The management plan should recognize that these fisheries are not equivalent in effect.

- We should not convert a roe-focused local opportunity into a whole-fish export pathway without demonstrating no added risk to the forage base.

This phrase combines allocation and conservation. Roe-based harvest opportunity in Togiak represents local economic value and local participation. Reallocating that opportunity to a whole-fish fishery based outside the region increases removal of forage biomass and exports the economic benefit. Before such a change is made, proponents should have to demonstrate that the shift will not increase risk to the ecosystem forage base that supports salmon and other predators.

- When recent sampling and fishery-dependent data are thin, the prudent approach is not to expand directed removals.

This is a precautionary management argument. When fisheries are inactive for multiple years, sampling data often declines, meaning managers may have less information on stock status, age class composition, recruitment, and run timing. Under those conditions, expanding directed harvest is risky because the biological foundation for the decision is weaker. The most responsible approach is to maintain conservative management until stronger data and updated biomass estimates are available.

- Even if this proposal looks small on paper, it lands on top of broader ecosystem and bycatch pressures.

The concern is cumulative impact. A 15 percent reallocation may appear minor, but it adds additional directed harvest pressure to a stock already influenced by environmental variability and potential bycatch impacts in other fisheries. Management decisions should not be made in isolation, especially for forage species. Even small incremental removals can contribute to larger long-term impacts when combined with other pressures.

- If market demand is shifting toward whole-fish product, that opportunity should first be available to the district of origin.

This is a fairness and local economic development argument. If the market is evolving toward bait or food uses, the first opportunity to participate should go to the communities and fleets closest to the resource. The district of origin should have the chance to adapt, develop processing capacity, and build new markets. Automatically reallocating that opportunity to Dutch Harbor bypasses local development and undermines local self-determination.

- If there is unused opportunity, the remedy should be local development, not exporting the fish to outside supply chains.

This phrase emphasizes that unused allocation should not automatically be treated as waste. If the problem is limited participation or processing capacity, the solution should be investment in local development, such as rebuilding local processing, creating market access, or developing new products in-region. Exporting the fish to outside supply chains removes the incentive to develop local opportunity and shifts the benefit away from Bristol Bay communities.

- Do not pre-allocate future local diversification to Dutch Harbor before Togiak has had a fair chance to rebuild and adapt.

This point recognizes that communities may need time to restore fishery participation, rebuild infrastructure, and develop new markets. A reallocation like Proposal 188 creates a structural shift that can permanently reduce future local opportunity. Once a new user group receives allocation, it becomes difficult to reverse. The Board should avoid decisions that pre-empt future local diversification before the region has a fair chance to reestablish participation.

- This is not a utilization fix, it is a structural reallocation.

Proponents frame Proposal 188 as a way to use fish that otherwise go unutilized. In reality, the proposal changes the structure of the management plan by creating a guaranteed pathway for Dutch Harbor harvest whenever Togiak does not meet its target. That is a reallocation decision, not simply a utilization decision. The Board should treat it as a major allocation change and apply a higher standard of justification.

- This proposal creates allocation creep and a one-way ratchet away from local benefit.

Once a new allocation is established, it tends to expand over time, either through precedent, future proposals, or political pressure. Proposal 188 would normalize the idea that Togiak's unharvested opportunity belongs elsewhere. That sets the stage for future increases or additional reallocations. Over time, this allocation creep can steadily shift benefits away from the local communities tied to the resource.

- The burden of proof should be on proponents to demonstrate biological surplus and show the proposal does not increase risk to the forage base, salmon, predators, or subsistence users.

This is the key governance principle. It is not the responsibility of local communities to prove harm after the fact. When proposing new directed removals of a forage species, the burden should be on proponents to demonstrate that the stock can support additional harvest without reducing ecosystem function, predator food availability, subsistence needs, or long-term sustainability. Without updated biomass estimates and a clear risk analysis, the Board should not approve reallocation based on assumptions.