

Madam Chair, Members of the Board,

My name is Axel Kopun & I am from Chignik. In 2023, The BOF decided to abdicate its regulatory authority to 7 seiners & 2 processors in Area M and call it “Adaptive Management.” These are the **same** fishermen and Processors that are at this meeting opposing **any and all** fisheries conservation proposals, even those focused solely on Chignik. That is **not** the mentality I want in charge of managing the largest intercept fishery in the State.

The Board of Fish exists to create regulations and allocate between fisheries. The Department of Fish & Game exists to manage those fisheries according to those regulations. But in Area M, that authority has been handed over to individual fishermen and the private sector. If they can regulate and manage better than the Board & the Department of Fish & Game, why can't we all?

A crucial element of true “Adaptive Management” is the ability to assess progress towards accomplishment of an objective. Here, the objective **should be** to reduce fishing pressure on AYK chum stocks and Chignik-bound sockeye, especially the early run which is a stock of concern. But the objective of Area M's adaptive management is simply to avoid exceeding a chum cap.

With respect to AYK chum, there is no effective way to assess in real time whether these “adaptive measures” are sufficient to meaningfully reduce fishing pressure **in-season**, when those adaptive measures matter most. You cannot truly know the effectiveness of those measures until you know how many of those stocks actually escape back to their natal streams. There is no way to know that in June, and therefore you cannot truly gauge the effectiveness of those measures until the Area M fleet has finished fishing.

Under this so-called “Adaptive Management” model, we are told that there is full compliance by the Area M fleet, but where is the information allowing an independent assessment of that compliance? Where is the data documenting the alleged forgone harvest opportunity of every member of the fleet? where is the data showing that processors employ economic sanctions against members of the fleet who violate these voluntary adaptive methods?

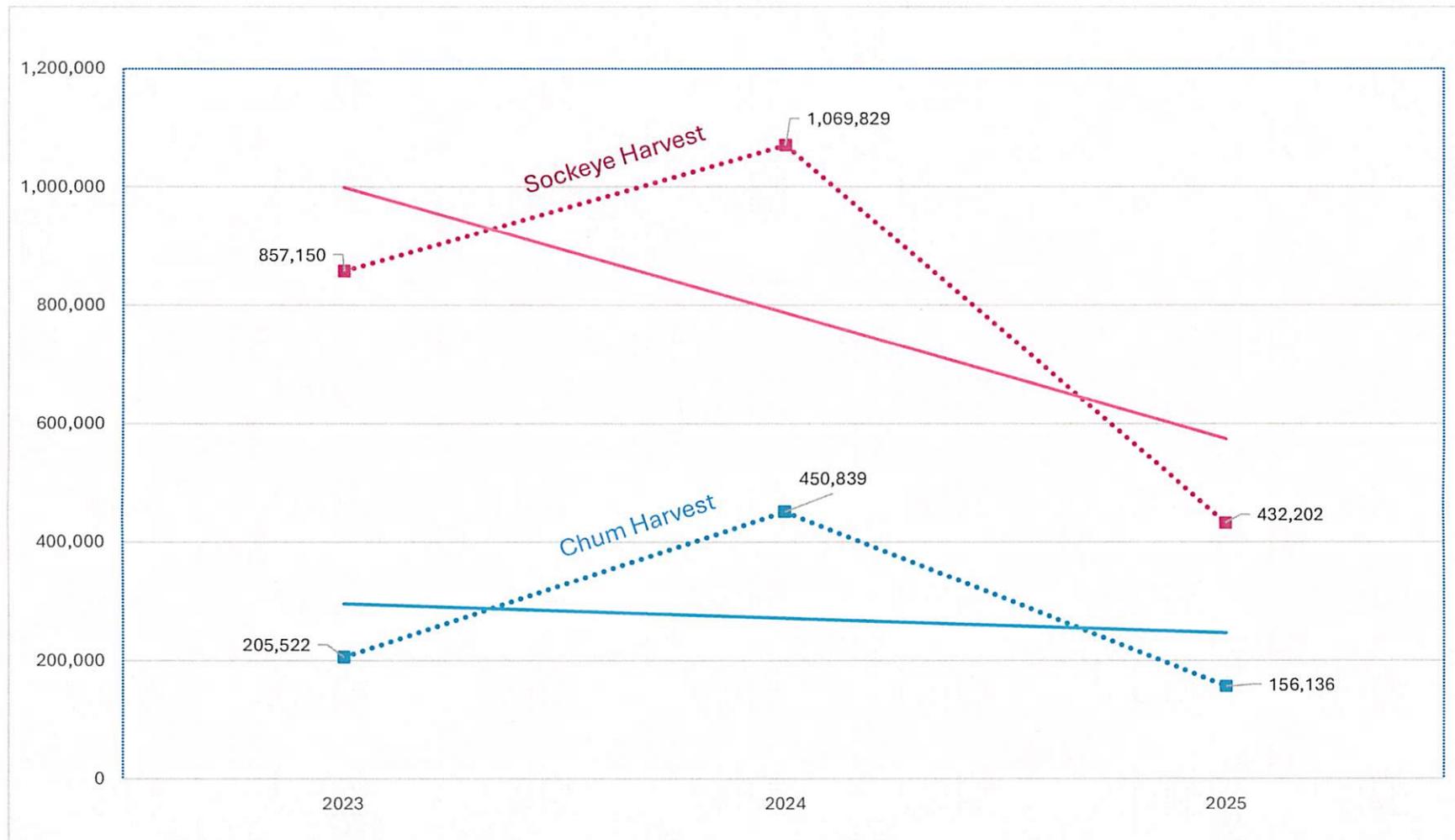
“Adaptive Management” of the State's most important common property resource should happen in public, not behind closed doors. Members of the public should know what decisions are being made & who is making them. Under this scheme, the public doesn't know who is making decisions, doesn't know what those decisions are, and has no way to truly determine whether adaptive measures are achieving their intended purpose. This version of “Adaptive Management” does not constitute **true** adaptive management - it

lacks verifiable data, enforceable triggers, and accountability - and instead functions as an industry illusion.

The Board & the Department simply must do their job & create **enforceable** regulations to help conserve depleted stocks travelling through this area.

If you want to see a **true** version of adaptive management, please look at proposal 112.

Area M “Adaptive Management” Plan in Reality



A successful adaptive management plan to reduce chum catch would have a chum harvest trendline decreasing at a greater rate than the sockeye harvest trendline.