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March 7, 2023

Alaska Board of Fisheries  
Alaska Department of Fish and Game  
Board Support Services  
333 Raspberry Road  
Anchorage, Alaska 99518

RE: Support for the Recommendations of the Nushagak King Salmon Committee

Dear Chair Carlson-Van Dort and Alaska Board of Fisheries Members,

Bristol Bay Native Corporation (BBNC) supports the recommended changes to the Nushagak-Mulchatna King Salmon Management Plan submitted by Nushagak King Salmon Committee (NKSC or Committee) and denominated as Public Comment 356 in the meeting materials for this week's Alaska Board of Fisheries, Statewide Finfish Meeting (March 10-14, 2023). These recommendations were crafted on the behalf of all users in the Nushagak watershed to conserve Nushagak King salmon while balancing factors important to the associated fisheries. BBNC encourages the Board of Fisheries (BOF) to adopt the recommendations of the NKSC.

BBNC is the Alaska Native Claims Settlement Act of 1971 (ANCSA) regional corporation for the Bristol Bay region – the region that includes the Nushagak-Mulchatna river systems. BBNC currently has approximately 12,000 shareholders, many of whom rely on the region's fisheries for their livelihoods and subsistence. It is BBNC's mission to "Enrich our Native Way of Life," and this includes advocating on behalf of our shareholders on matters that are important to the region, including subsistence, economic, and fishery management issues.

Background/Recent Steps Taken: At its November 2022 meeting, the Alaska Board of Fisheries deferred action on proposals concerning the Nushagak-Mulchatna King Salmon Management Plan (Proposals 11-13) and the Nushagak River King Salmon Stock Status and Action Plan (RC004) to its March 2023 Statewide meeting. The Board of Fisheries Chair encouraged members of the public to use the additional time to collaborate on alternate management proposals for Nushagak River King salmon.

The Bristol Bay Science and Research Institute (BBSRI) Study Team met with Alaska Department of Fish and Game staff on several occasions prior to convening the NKSC to discuss elements in the Action Plan for further consideration. Elements included

triggers to delay the start of commercial openings to allow additional King salmon passage into the river, optimum escapement goals (OEGs) for Nushagak and Wood River sockeye salmon to reduce effort once commercial fishing begins, opening the Wood River Special Harvest Area to allow sockeye salmon harvest when the District is closed early in the season, commercial mesh size restriction to 4 ¾", reduced bag limits in the sport fishery, and status quo regulations for the subsistence fishery. Department staff also suggested placing these Action Plan provisions in a new, independent regulatory plan that would be in effect (only) when the Stock of Concern (SOC) exists and provided draft conceptual language to use as a starting point for discussion.

The NKSC met twice to develop a management solution considering the deferred proposals and Action Plan. On February 13, 2023, the Committee met with ADF&G staff to discuss the "Stock of Concern Management Plan" concept and elements, using the draft conceptual language as a starting point. The Committee also discussed Proposal 11 and how the SOC Management Plan would mesh with the existing management plan. The Committee concurred with the concept of a new SOC Management Plan, suggested changes to language in Proposal 11 and the draft SOC Management Plan, and agreed to meet again to discuss specific elements including numerical threshold and trigger levels. The Committee reconvened on February 21, 2023, to refine language in the SOC Management Plan and in Proposal 11 and worked to achieve consensus on as many points as possible.

#### Nushagak King Salmon Committee Consensus Items:

- 1) The regulatory language is in the form of a new, independent management plan intended to remain in effect only while the SOC exists. All Action Plan conservation actions are thereby in one regulation, not merged into multiple existing plans. This eliminates having to remove them from regulation once Nushagak River King salmon are out of SOC status. This new Nushagak King Salmon SOC Management Plan (SOCMP) will supersede existing regulations only be in effect while a SOC status exists. The purpose of the independent management plan is to keep all management actions in one place, cause them to be effective only while Nushagak King salmon are listed as a stock of management concern, and eliminate the need for Board action after delisting.
- 2) Optimum escapement goals (OEGs) will be established for sockeye salmon on both the Nushagak and Wood rivers during years of high sockeye salmon abundance, to reduce fishing effort once triggers are met and fishing begins in the district. These OEGs will establish a range of acceptable sockeye salmon escapements above the current Sockeye Escapement Goals (SEGs), with upper bounds that slide in response to forecasted or projected run size, in years of high sockeye salmon abundance so that King salmon can continue to be conserved. This guides the department to reduce commercial fishery effort at times it would otherwise be fishing more to keep escapement below the upper end of the SEGs. The purpose of this is to allow more King salmon through the district by directing the department to reduce the commercial fishery effort resulting in a higher number of sockeye than the upper end of the current SEG.


3) The SOCMP establishes triggers that delay the start of commercial fishing in the Nushagak District to allow for additional King salmon passage into the river. The district will remain closed until sockeye salmon "triggers" are met or until June 28 (whichever comes first). The purpose of this timing is to delay commercial fishing during the peak of King salmon run timing through the district (60% of the King salmon run passes through the district by June 28). Triggers will only be in effect in years when the King run is underperforming, *i.e.*, when the in-river King salmon run size is projected to be less than 95,000 fish. Triggers were originally included in Proposal 11 (Item 4), in addition to the Action Plan.

(4) Conserve King salmon in the sport fishery by reducing the annual limit for large King salmon. The purpose of this is to conserve King salmon by reducing the upriver harvest (See NEW PLAN, section (e)). This provision was originally included in Proposal 11, Item 6.

(5) Status quo regulations for the subsistence fishery.

Thank you for the opportunity to comment and for your work as members of the Alaska Board of Fisheries.

Sincerely,



Jason Metrokin  
President & CEO