

To: Chairman Kluberton, Members of the Alaska Board of Fisheries

RC 014

From: Ernie Weiss, Natural Resources Department, Aleutians East Borough

Thank you for the opportunity to comment in the Board of Fisheries process. We appreciate your attention to stakeholder input by local groups and Advisory Committees that are most impacted by your decisions.

The Aleutians East Borough (AEB) is the municipal government that encompasses the majority of the Alaska Peninsula Salmon Management Area M. Our Borough boundaries include state-waters from Kupreanof Point in the southeast, down to the southwest including Akutan and Unalga islands, and along the northern district northeast up to near Strogonof Point. Our six local communities are all dependent on fishing and the Borough supports the fishing industry through the use of fish tax revenue to build support infrastructure including docks & harbors.

AEB municipal code provides for a Natural Resources Department that is responsible in part to provide assistance and guidance to management agencies on the protection, development, management and renewal of natural resources within the Borough and to maximize benefits for Borough residents from the use of these natural resources. As part of this function, I am pleased to present the Board of Fisheries with a list of the current Alaska Peninsula salmon proposals that the AEB strongly supports and proposals we strongly oppose, including rationale for these positions.

The Aleutians East Borough strongly supports these proposals:

Support Proposal 167 by the False Pass Advisory Committee – that would open the Uruia Bay Section of the Northwestern District to regular fishing periods.

- Rationale in support of Proposal 167 – we support this proposal by the local False Pass Advisory Committee, the group that has firsthand knowledge of this local fishery. Reverting back to allowing regular openings and using emergency closures could allow for increased fishing opportunity and earlier surveys for escapement.

Support Proposal 179 by John A Foster – that would amend the Southeastern District Mainland Salmon Management Plan to establish that 40 percent of the sockeye salmon taken in the East Stepovak, Stepovak Flats, Southwest Stepovak, Balboa Bay, and Beaver Bay sections are considered to be of Chignik River origin.

- Rationale in support of Proposal 179 – current regulations generally assume that 80% of sockeye salmon harvested in SEDM are of Chignik origin, based loosely on a tagging study conducted 55 years ago in which 8 of 10 tags were recovered in the Chignik Lagoon. The 2012 ADF&G publication SP 12-31, the *Genetic Stock Composition of the Commercial Harvest of Sockeye Salmon in Southeastern District Mainland, Alaska Peninsula Management Area, 2010–2012*, shows that the SEDM stock composition of Chignik-bound sockeye is generally somewhat less than 80%. The percentage in regulation should be modified to reflect up-to-date science. <http://www.adfg.alaska.gov/fedaidpdfs/sp12-31.pdf> pgs. 21-22.

Support Proposal 191 by the King Cove Advisory Committee – that would repeal minimum mesh size standards for drift gillnet gear.

- Rationale in support of Proposal 191 - we support this proposal by the local King Cove Advisory Committee, and understand there are significant costs to purchase additional drift nets to fish in the South Peninsula fishery post-June.

Support Proposal 193 by CAMF – that would change the Southwestern and Unimak District seaward boundary.

- Rationale in support of Proposal 193 – this proposal that is supported by staff will clarify regulations by adopting the federal FMP language describing the state & federal waters boundary in the Southwestern and Unimak districts, thereby avoiding confusion and potentially aiding enforcement.

Support Proposal 197 by ADFG – that would clarify when commercial salmon fishing license holders may subsistence fish for salmon in the Alaska Peninsula Area.

- Rationale in support of Proposal 197 – we support this ADFG proposal that will clarify regulations for subsistence only fishermen and commercial fishermen.

Support Proposal 198 by the Nelson Lagoon Advisory Committee and APICDA- that would require non-retention of King salmon in the Sandy River.

- Rationale in support of Proposal 198 - we support this proposal by the local Nelson Lagoon Advisory Committee and APICDA, owners of the Sandy River Lodge, in an effort to preserve the local Chinook salmon stock.

The Aleutians East Borough strongly opposes these proposals:

Oppose Proposals 22, 23 & 24 by the Port Heiden Native Village, Gerda Kosbruk & Larry Christiansen respectively – that would move sections of the Northern District from the Alaska Peninsula Area to the Bristol Bay Area.

- Rationale against Proposals 22, 23 & 24 - these allocative proposals would greatly diminish the value of Area M drift permits. The fishing areas that would be lost to Area M are important to Aleutians East Borough resident fishing operations and these salmon are critical to the operations of the Peter Pan Seafoods plant at Port Moller, a salmon processing plant that has operated seasonally nearly every year for over 100 years. Staff comments under Proposal 24 state that Cape Menshikof has been an established fishery management boundary since at least 1924. Status quo is working.

Oppose Proposals 155 & 156 by Mitch Seybert & Kurt Johnson respectively – that would close the Outer Port Heiden (OPH) Section of the Northern District to commercial salmon fishing.

- Rationale against Proposals 155 & 156 – these proposals would close the OPH section when the current management strategy is working well. According to WASSIP (SP 12-24 pgs. 622-623), the OPH harvest rate of Ugashik sockeye ranges from 2.1 – 4.3%, a relatively small impact on that run. Also, the OPH salmon harvest opportunity is important to local AEB fishermen and to the continued operation of the PPSF processing plant at Port Moller.

Oppose Proposal 158 by the Lower Bristol Bay Advisory Committee – that would restrict commercial salmon fishing in the Three Hills, Ilnik, and Outer Port Heiden sections of the Northern District to no more than one and one-half miles offshore.

- Rationale against Proposal 158 – there is no compelling reason to restrict fishing to 1 & ½ miles offshore. On the other hand, a limited 1 & ½ mile corridor would be a safety concern in certain weather.

Oppose Proposal 163 by the Lower Bristol Bay Advisory Committee – that would restrict drift and set gillnets to 29 and one-half meshes depth between the longitude of Three Hills and the northern boundary of the Outer Port Heiden Section.

- Rationale against Proposal 163 – there is no compelling reason to restrict nets fishing in the OPH section to 29 ½ meshes, but implementation of this proposal would be expensive for the fleet and difficult to enforce.

Oppose Proposal 180 by the Chignik Advisory Committee – that would require all salmon harvested in the Southeastern District Mainland fishery to be landed within the Southeastern District.

- Rationale against Proposal 180 - current regulations already require that permit holders report accurately where salmon are harvested. Also, requiring all SEDM harvested salmon be delivered in the SEDM would increase the cost to processors providing tenders for fishing vessels.

Oppose Proposal 181 by Jesse Foster – that would repeal the South Unimak and Shumagin Islands June Salmon Management Plan.

- Rationale against Proposal 181 – eliminating any June salmon harvesting opportunity in the South Unimak & Shumagin Islands would end a century old fishery and create severe hardship for residents of the AEB. This proposal is unnecessary and unwarranted.

Oppose Proposal 184 by the Fairbanks Advisory Committee – that would repeal the current South Unimak and Shumagin Islands June Salmon Management Plan and readopt the management plan in place during 2003-2004.

- Rationale against Proposal 184 – adoption of this proposal would result in a burdensome management plan that would require additional ADF&G resources, and cause unnecessary hardships on the fishermen of the area.

Oppose Proposals 185 & 186 by John Jones and the Chignik Advisory Committee respectively – that would establish a Dolgoi Island Section and Dolgoi Island Section Management Plan.

- Rationale against Proposals 185 & 186 - the Alaska Constitution states 'Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.' Also the WASSIP study (SP12-24, pgs. 22& 24) sockeye harvest rate document shows a low impact on the overall Chignik runs. The current management strategy is working well; an unnecessary change could result in unintended consequences.