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December 18, 2019

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811

Re: Opposition to Proposals 58,59,60,61,62,63,64,37,65,66

Dear Chairman Morisky and Board Members:

Old Harbor Native Corporation (OHNC) is actively involved in helping the community of Old Harbor survive. A number of years ago, at the conclusion of an extensive community planning process, Old Harbor identified the community's long-term goals. Old Harbor wanted to maintain its local fishing fleet and to develop a processing plant in Old Harbor. The processing plant would provide year-around jobs and the fishing fleet would locally deliver their catch. This remains Old Harbor's vision for the community's future.

OHNC has assisted Old Harbor to build a small boat harbor, municipal dock, dredge the harbor, extend the airstrip and is currently focused on building a hydroelectric energy project. All of these projects were identified as necessary infrastructure to support a local processing plant and are based on the assumption of maintaining Old Harbor's local fishing fleet. Proposals 58-62 regarding Cape Igvak and proposals 63-66 to shut down both sides of the Shelikof Strait strike at the heart of Old Harbor's long-term goal for community survival. We see that the cumulative impact of these two proposals could reduce Kodiak's salmon earnings by as much as 30%. What business can continue with a 30% loss --- especially in a small rural community like Old Harbor? Even if the Board accepted a less onerous proposals or made proposal modifications, small or incremental economic impacts to Old Harbor's fishing fleet will put some Old Harbor fishermen out of business.

Note: Old Harbor is uncertain how the new language for proposal 37 will impact us. The concept of a comprehensive Kodiak, Chignik and Cook Inlet management plan seems like a formula to move local management decisions away from our region and easily marginalize fishing communities like Old Harbor.

Old Harbor once had a diversified fishing fleet that moved from one fishery to another. However, Alaska's limited entry system started a trend that has now resulted in Old Harbor's fleet depending almost entirely on salmon. Most Old Harbor fishermen were aggressively and successfully fishing herring during the qualifying years for halibut IFQs and consequently were mostly excluded from the halibut fishery. Now, like most of Kodiak, Old Harbor doesn't have a herring market and the fishery is almost dead. Tanner fishing is also almost gone with a very small quota and short season expected in 2020. Finally, the Federal cod season closed this year. The Only fishery left for Old Harbor fishermen

is Salmon. That's why proposals 58-66 and 39 are so threatening. These proposals hit at the foundation of the one fishery Old Harbor fishermen have left.

Old Harbor Native Corporation representing our salmon fishermen feels the inequities of a Board process that allows any individual or group to capriciously put a proposal in the Board packet cycle after cycle after cycle. OHNC is then forced to spend time and resources to maintain the status-quo and protect the Old Harbor fleet. Yet, the proposer has no cost or consequences from filing proposal after proposal, cycle after cycle. In this context, Old Harbor Native Corporation believes it's very important for the Board to honor and reinforce the decisions of past Boards. Plans that have been in place for 40 years (Cape Igvak) or 30 years (N. Shelikof) should be viewed as a precedent for the current Board. Otherwise, the Board will only encourage continual and often similar proposals Board cycle after Board cycle. Old Harbor believes that by dismissing the 10 Cape Igvak and the Cook Inlet origin proposals with short "NO" vote and little discussion the Board will communicate a stronger and better message: absence significant "new information" or major "fishery change" the Board will maintain current management plans.

Why has the Board after Board maintained the Cape Igvak Management Plan without substantive changes for 40 years? First, plan was based on conservation concerns. Kodiak would share the conservation burden by being restricted during years of low abundance. Second, the plan is fair and equitably balanced between the two stakeholders. The prior fishery was "day for day" in the two areas. The plan reduced Kodiak's fishing time but provided an opportunity for Kodiak, in good Chignik years, to catch their historical percentage. Then third, the plan provides an economic safety net for Chignik fishermen. This next year the safety net for Chignik is expected to be about above \$5,000,000. Changing the plan now would result in prolonged conflict between Kodiak and Chignik focusing on Chignik's expanded fishery outside of the lagoon and in the eastern districts.

Why has the Board maintained the North Shelikof Management Plan for 30 years and rejected dozens of Cook Inlet proposals to "protect" Cook Inlet origin sockeye in the Kodiak area? The North Shelikof plan was imposed because of an anomalous fishery in 1978 when much of the Kodiak fleet was fishing in Federal waters and was able to "target" Cook Inlet sockeye. The plan clarified that Kodiak fishermen could NOT fish in federal waters (unlike Cook Inlet drift fishermen) and balanced Kodiak's historical fishery in the North Shelikof for local stocks while prohibiting "targeting". The goal of the plan was not to stop the catch of Cook Inlet Sockeye in the Kodiak area or to even "minimize" it, the goal of the plan was to keep the Kodiak fleet focused on local stocks and to maintain historical fishing patterns.

Closing Kodiak's Mainland districts (proposals 63-65) due to the presence of Cook Inlet origin salmon was discussed extensively by the Board and a joint Cook Inlet-Kodiak task force throughout the 1990s. Also, during the same timeframe, the idea of a "cape to cape" fishery in July on the west side of Kodiak Island (proposal 66) received considerable analysis. Out of these multi-year discussions came

estimates of the amount of Cook Inlet origin sockeye (Barrett, Swanton) and chinook (Swanton et. al.) captured in the Kodiak Management area as well as a recognition of high variability between years and from one location to another. In the end, the Board determined that the amounts of Cook Inlet origin sockeye and chinook captured in the Kodiak area were not biologically significant and that Kodiak's fishing patterns, with the exception of 1989, had not changed. Moreover they concluded that the presence of Cook Inlet origin salmon in the Kodiak area varied widely based on the strength of the Cook Inlet run.

Much is made by Cook Inlet of the 2014-16 Genetic Stock Composition of the Commercial harvest of Sockeye Salmon in Kodiak Management Area (Shedd). However, to Kodiak managers and those who had participated in the 1990s discussions this was not new or surprising information. The study fit within all that had previously been known and published by the Department regarding the issue of Cook Inlet origin stocks within the Kodiak area. Specifically, that the presence of Cook Inlet stocks in the Kodiak area is unpredictable: abundance changes annually, timing changes annually and geography, or where fish are found in the Kodiak area, changes annually.

Shedd's Genetic Stock Composition Study has value in providing detail to earlier predictions. However, the authors as well as independent genetic experts indicate caution should be taken to extrapolate the results of the study, especially for allocation purposes. The study occurred during three of the highest temperature years on record and multiple studies show that water temperatures, at least thermal differentiation within currents, impact salmon migration patterns. The Shedd study focuses on sockeye and chinook only and therefore doesn't create the "context" for the Kodiak fishery that is also harvesting chum, pink and coho salmon. In some years, several million pink salmon have been caught locally during the July timeframe --- this is a particularly important time for Old Harbor fishermen focused on early east side salmon returns. In addition, the study doesn't extend beyond August so any "percent" of Kodiak sockeye stocks is skewed because Kodiak's September catch is excluded.

Old Harbor Native Corporation is aware that the Board will use your allocation criteria if you are to seriously consider the aforementioned proposals. As we have pointed out, the history of each fishery and the long-established management plans that balance between competing stakeholders would call that the Board vote NO on proposals 58,59,60,61,62,63,64,65,66 and 37. Moreover, the long term, similar fishing patters in the Kodiak area as well as stability of participants also should lead the Board to vote NO. As OHNC has pointed out, Old Harbor fishermen currently have few alternate fisheries resources and the Kodiak salmon fishery is of utmost importance to the economy of Old Harbor and Kodiak Island. We further believe that the value of Cook Inlet origin sockeye caught in Kodiak is likely to be higher for the State of Alaska than having those fish go into the complex Cook Inlet management system where approximately half will escape the commercial, personal use and subsistence fisheries.



Old Harbor Native Corporation through our Fisheries Committee of Old Harbor fishermen has worked closely with the Kodiak Salmon Workgroup to provide the Alaska Board of Fisheries with research, data and information to support Old Harbor's historical salmon fishery. We believe that there is NO new information of significance nor any change in fishing behavior regarding non-local stocks in the Kodiak area that justifies changing the Cape Igvak management plan or changing and/or adding on to the North Shelikof management plan. The Alaska Board of Fisheries and the State of Alaska are facing many significant fishery management issues, the concerns of some Cook Inlet and Chignik fishermen regarding Old Harbor and Kodiak's salmon fishery are not among them. Again, Old Harbor Native Corporation is asking you to vote NO on proposals 37, 58,59,60,61,62,63,64,65 and 66. Thank you for your consideration of our comments, please contact our office if you have any questions. Quyanaa – Thank you.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read "Carl H. Marrs".

Carl H. Marrs
Chief Executive Officer