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Alaska Board of Fisheries  
Marit Carlson-Van Dort, Chair  
Via email [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

**RE: Public comment on Proposal 282**

Chair Carlson-Van Dort and Board Members:

On behalf of Trident Seafoods, I thank you for the opportunity to comment on **Proposal 282**, which requests further reductions to the fishing periods in the Shumagin Islands and Dolgoi Islands Area. **For the reasons detailed below, we ask the Board to delay taking any action until the in-cycle meeting in 2023.**

**Proposal 282 will have a significant impact on Trident's ability to serve both Chignik and Area M fleets.**

Trident Seafoods is a family-owned company, with shoreside processing and fleet support facilities in twelve Alaska communities, including Sand Point, False Pass, and Chignik. Our Sand Point facility is uniquely impacted by any Board action pertaining to Area M and Chignik, as it serves as the primary processor for salmon harvested in Chignik, while also being dependent on our Area M fleet's ability to access the Area M salmon resource. Reductions in Area M harvest opportunity will negatively impact the viability of operations in Sand Point, which will, in turn, decrease our ability to serve the Chignik fleet. Both of these salmon fisheries are important to the ongoing processing activity in the region and the communities they support.

**The complexity of Area M and L management necessitates the type of robust analysis that only an in-cycle meeting can provide.** As noted by Alaska Fish and Game (ADFG) staff during the October work session, Area M management is incredibly complicated and acting out-of-cycle at the end of long back-to-back Board meetings is not good public process. It is important to note that the Board did not produce a decision record after its last meeting where it took significant action to restrict fishing opportunity in Area M, as it did when it made major changes to the Area M management structure in 2004. This Board has been almost entirely reshuffled since the 2018 meeting, and an understanding of past management decisions will be essential to understand the impact of Proposal 282. For this reason, it is better for the Board to take a focused approach during the 2023 in-cycle meeting, where new members can consider a full suite of information and proposals related to Areas M and L.

**Potential future changes to Chignik escapement management support delayed action.** In October, ADFG indicated that it was planning on making significant changes to how it manages Chignik escapement goals and that these changes will be before the Board during the in-cycle meeting in 2023. These changes will impact how the Board balances the impact of management changes to Area M and Chignik. It therefore seems premature to consider a proposal that will have significant impact on the stakeholders of Area M, before the Board evaluates how changes to escapement goals will impact allocations.

**It is not clear that a conservation concern exists.** Late-run and total escapements were achieved in 2021. 2021 total season sockeye escapement is near the five-year average and actually increased relative to the three-year average. Neither run is listed as a “stock of concern.” ADFG forecasts that Chignik runs will meet escapement in 2022, as the preliminary forecast for Chignik is for an early run of 639,000 sockeye (escapement of 400,000 and harvest of 239,000).

In 2019, the Board increased closed areas for all gear types in the South Peninsula June fishery and closed the Dolgoi area to seining in June. These restrictions had significant negative impacts on harvesters, processors, and communities in Area M, *and have not even been given a full sockeye life cycle for the Board to evaluate their efficacy in increasing Chignik runs.* Looking at the fishery performance over the past four years, there does not appear to be a strong causal link to June harvest in the Shumagin/Dolgoi Island area and early-run Chignik sockeye; rather, the most direct connection to Chignik’s runs appears to be associated with habitat degradation in Black Lake and the corresponding condition of out-migrating smolt, which was poor from 2007 – 2019. The Board should not support a proposal that results in further direct economic harm at this point, especially given the lack of corresponding benefit.

**Even if a conservation concern existed, ADFG already has authority to restrict Area M harvests in order to minimize harvest of Chignik-bound sockeye.** ADFG used this authority in 2018 and 2020 to close the Dolgoi Island Area and reduce fishing times in the Shumagin Islands. ADFG can continue to use this authority as needed until all potential issues regarding Chignik runs can be explored in the next meeting cycle. Please do not support Proposal 282 at this time.

Thank you for the opportunity to comment.



Shannon Carroll  
Director, Alaska Fisheries Development and Public Policy