



March 11, 2022

Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811
Submitted via email: dfg.bof.comments@alaska.gov

RE: Comments on Proposal 282

Dear Alaska Board of Fisheries Members:

Silver Bay Seafoods is opposed to Proposal 282 currently under consideration by the Alaska Board of Fisheries (board) at its March statewide meeting.

Silver Bay Seafoods is a fisherman-owned, Alaska seafood processing company. We operate six processing facilities in coastal Alaska fishing communities. Our False Pass facility supports purse seine and drift gillnet fishermen who participate in the South Unimak and Shumagin Island fisheries. This facility began operating in 2019 after considerable investment by Silver Bay and our fishermen partners. The decision to invest in the community of False Pass and the False Pass processing facility was made strategically based on knowing Alaska's fisheries management is based on a long history of good science, sustained yield principles and consistent regulatory cycles.

Proposal 282 aims to modify regulations in the *South Unimak and Shumagin Island June Salmon Management Plan* and *Post-June Salmon Management Plan for the South Alaska Peninsula*. This allocative proposal includes significant reductions in fishing time for these areas with the intent of reallocating fish from Area M to Chignik. The current management plans have been developed and debated over the last few decades and are consistent with the policies for both management of mixed stock fisheries and management of sustainable salmon fisheries (5 AAC 39.220 and 5 AAC 39.222). These plans have a long history and the fisheries are complex and interconnected. Taking up this one proposal out-of-cycle unfairly targets the Area M fishery and doesn't provide the board comprehensive scientific information and regulatory options to consider if the goal is to increase opportunity for Chignik harvesters.

Salmon fisheries can and do fluctuate, and the current plans are built to provide a management system with a goal of sustained yield over time. Additionally, these plans have been adopted by previous boards to ensure the burden of conservation is shared. Chignik is primarily a terminal harvest fishery, and harvest of sockeye destined for the Chignik river systems are high. The South Unimak and Shumagin Island fisheries are mixed stock fisheries, which directs harvest pressure over a larger area, distributes harvest temporally throughout various salmon runs, and dilutes impacts to weaker stocks. Alaska's salmon industry and communities rely upon stable

fisheries, many of which are mixed stock fisheries – these fisheries should be recognized and protected by the Board.

The South Unimak and Shumigan Island fisheries management plans already limit by time and area to allocate more fish to Chignik, and ADF&G uses inseason management to further restrict through inseason management actions. In 2018 and 2020, ADF&G restricted Area M harvests in an attempt to protect Chignik runs. Additionally, the board has taken significant actions to reduce multiple fisheries in an effort to increase returns to Chignik. Recent changes haven't even been in effect long enough to fully evaluate effectiveness.

ADF&G forecasts Chignik runs will meet escapement in 2022. The Department's preliminary forecast for Chignik is for an early run of 639,000, with escapement of 400,000 and harvest of 239,000. Monitoring the outcome of the 2022 season would provide more information about the recent changes in these fisheries, and the status of the Chignik stocks.

ADF&G Commissioner Doug Vincent-Lang indicated at the October Work Session that the department is analyzing and revising the Chignik escapement goals. This escapement goal memo is planned to be published for the regularly scheduled Alaska Peninsula/Chignik Board of Fisheries meeting in 2023. He also indicated that the changes being considered would impact the management of these fisheries and could offer some improved opportunities to Chignik stakeholders. This is critical information to use as the board considers changes to the Area M and Chignik management plans, and we urge the board to hold action until the regular board meeting in 2023.

If adopted, proposal 282 would have devastating impacts to fishermen, processors, communities, and businesses who are heavily reliant on these fisheries. All stakeholders depend on a consistent process and predictable regulatory cycle. Proposals can be submitted to the board in April 2022 and considered during the regular cycle for this region where a comprehensive public process can occur.

Respectfully,



Abby Fredrick
Director of Communications