

February 22, 2019

Good Morning/Afternoon Mr. Chairman, Members of the Board,

My name is Patrick Brown and I am the Chairman of the Sand Point AC. In April 2018, the Sand Point AC met with the purpose of generating proposals for this BOF meeting. In total, we submitted 9 proposals to be considered. Eight of these were taken up for consideration and we will be discussing those this meeting. One proposal was rejected for consideration.

Since that meeting, our AC has met four times to consider these proposals. The poor 2018 run in the CMA was something that was obviously unforeseen by anyone on either side of the line. Proposals that we submitted in anticipation of this meeting could in no way address what happened in the 2018 fishery, and we have revisited our stance on several of these issues.

Proposal 130 seeks to decrease the Chignik river-origin sockeye salmon harvest composition from 80% to 60% in the SEDM, in order to more accurately reflect the WASSIP reports. On September 15, 2018, the AC met and voted unanimously in favor of supporting this proposal.

Proposal 131 seeks to increase the SEDM allocation of Chignik river-origin sockeye from 7.6% to 10%. This is not a conservation issue, as the allocation is predicated on Chignik escapement being met, and harvest threshold in Chignik being met as well. The SEDM area cannot open until 300,000 sockeye have been caught, or are anticipated to be caught in the early run. Harvest levels on the late run must have reached 600,000 fish in order to be able to fish on the late run. Many years the SEDM does not open in consideration of Chignik stocks. This historical fishery, which at one point was opened on a 5 day a week schedule, didn't open in 2018, and hasn't opened in many years since its implementation. On September 15, we voted unanimously to support this proposal.

Proposal 140 sought to open closed fishing area between Cape Tolstoi to McGinty Point during the month of June. On February 21, the AC met and decided to take no action on this proposal in

consideration of conservation issues currently being faced in the CMA.

Proposal 141 sought to repeal the Dolgoi Island management plan. On February 21, the AC met and decided to take no action on this proposal in consideration of conservation issues currently being faced in the CMA.

Proposal 143 sought to repeal the immature test fishery in the Shumagin Islands section. This is the only test fishery of this sort in the whole state of Alaska, and Area M seiners are the only group in the state subjected to these regulations, despite the fact that it is well known that immature salmon are present in many other fisheries throughout the state. On February 21, the AC met and voted to take No Action on this proposal in consideration of conservation issues. However, we would like it noted that we are and have been, for many years, taken considerable burden of conservation on this issue, and we would urge other areas of the state to follow suit in the pursuit of conservation. Especially as Chignik is looking toward expanding their intercept fishery into the Perryville and Western Districts with proposals 149, 150, and 151.

Proposal 152 sought to prohibit commercial fishing for salmon in the Perryville District and Mitrofanina Section until the Orzinski Lake escapement has been met. On January 15, the AC voted to withdraw support for this proposal.

Proposal 153 seeks to prohibit commercial fishing for salmon in the Perryville District and Mitrofanina Section of the CMA, when the Southeastern District Mainland is closed due to escapement concerns. This is a conservation issue. In many years, particularly even years when pink stocks are typically lower, Chignik fishermen fish this area under local management of sockeye stocks. This area is well outside the terminal areas where sockeye are historically harvested in the CMA. In our September meeting, we voted to support this proposal unanimously.

Proposal 156 seeks to repeal minimum mesh size requirements for set gill nets in the South Alaska Peninsula. The drift gill netters in the area have no minimum mesh size restrictions, and this proposal would bring us in line with their regulation. Best available science would indicate

that there is nothing to support the reasoning behind 5 1/4 inch mesh size. It is an incredibly large size for catching smaller fish, such as pink and sockeye salmon. Smaller, mature sockeye, could easily squeeze through 5 1/4 inch mesh. It is not the most efficient way to catch salmon, nor is it necessarily yielding the best product, if salmon are "gilled" behind the dorsal fin.

Under regulation, any fish other than a pink which is gilled in a 3.5 inch mesh is considered immature. In the June fishery, there is no minimum mesh size requirement currently, and the July fishery is the only fishery currently with mesh size requirements of 5 1/4 inches or greater. Post July 4 1/2 inches is the current mesh size requirement. In September, we voted unanimously to support this proposal.

The following proposals were written by other groups and individuals, and our positions are as follows:

Proposal 128, written by Axel Kopun, sees to increase the CMA harvest and escapement thresholds in the SEDM plan. Concerns against this proposal include that we won't be able to fish this area again. Historical sites that families fished for generations are rarely being utilized as it is at this rate. This proposal would effectively destroy any opportunity to fish SEDM before July 25. We opposed this proposal unanimously.

Proposal 129, submitted by Jim Smith, we took no action on, based on support for Proposal 130.

Proposal 132, submitted by Jack and Amy Foster, seeks to revise the SEDM plan to allow commercial salmon fishing with set gill net gear concurrent to open commercial fishing periods in the CMA. We approved this proposal unanimously, with amended language that includes seine gear can be used after July 10.

Proposal 133, submitted by Emil Mobeck, seeks to open SEDM concurrently with the Western and Perryville districts of CMA from June 1 through July 13. On February 22, 2019, the AC met and voted unanimously to withdraw support for this proposal in order to focus support on Proposal 132, as amended.

Proposal 134, submitted by Axel Kopun, seeks to repeal the current South Unimak and Shumagin Islands June Salmon Management plan and readopt an amended version of the management plan in place prior to 2001. We opposed this proposal unanimously. Public commentary was that there was no justification to change the current management plan. The current management plan is working and we would like to see a status quo regarding our June Management Plan. The previous management plan was severely detrimental to our fishery and many suffered economic hardships as a result.

Proposal 135, written by the Fairbanks Fish and Game Advisory Committee, seeks to repeal the current South Unimak and Shumagin Islands June Salmon Management Plan and readopt an amended version of the management plan in place prior to 2001. We opposed this proposal unanimously, for reasons similar to that of Proposal 134.

Proposal 136, submitted by Gary Anderson seeks to amend the South Unimak and Shumagin Islands June Salmon Management Plan so that fishing periods are structured with 24-hour windows where commercial salmon fishing gear is in the water. We opposed this proposal unanimously.

Proposal 137, written by George Anderson, seeks to expand geographic scope of the Dolgoi Islands Area as defined in the South Unimak and Shumagin Island June Salmon Management and Post-June Salmon Management Plan for the South Alaska Peninsula. We opposed this proposal unanimously. Current regulations are already very restrictive and close a large amount of area when triggers are met. Fishermen are displaced and forced to find other areas to harvest salmon as a result.

Proposal 138, proposed by Jacob Shangin, seeks to amend the South Unimak and Shumagin Islands June Salmon Management Plan for the South Alaska Peninsula to reduce commercial salmon fishing opportunity in the Dolgoi Island Area. We opposed this unanimously.

Proposal 139, submitted by the King Cove AC, to Repeal the Dolgoi Island Management plan, we voted to take no action on at a February 21 meeting.

Proposal 142, by Emil Mobeck, sought to establish commercial salmon fishing periods by emergency order from July 14 through July 31. On February 22, we met and voted unanimously to oppose this proposal.

Proposals 144 and 145 we opposed unanimously.

Proposal 146, by the Nelson Lagoon AC, we opposed unanimously.

Proposal 147, written by Don Bumpus, we took no action on.

Proposal 148, submitted by Jack and Amy Foster, seeks to amend the Chignik Area Salmon Management Plan so that pink, chum, and coho salmon stocks in the Western and Perryville sections of Area L will be managed based on the strength of the pink, chum, and coho salmon in the Stepovak and Shumagin Islands sections of Area M. We supported this proposal unanimously at our September meeting.

Proposal 149 seeks to increase commercial salmon fishing opportunity in the Western and Perryville districts. We opposed this unanimously at our September meeting.

Proposal 150, submitted by Don Bumpus, to open the Western District to commercial fishing for salmon for up to 48 hours each week from June 1 to July 5, we opposed unanimously. The CMA fishery prosecuted outside of the terminal harvest area, is quickly becoming an expanding intercept fishery. We believe this issue should be treaded lightly upon as we are approaching this meeting from a conservation standpoint.

Proposal 151, by Patrick Kosbruk and Edgar Shangin, seeks to increase commercial fishing opportunity in the Western and Perryville districts from June 1 through July 5. We opposed this

unanimously.

Proposal 154, by Tom Corr, seeks to adopt a large fish escapement goal for king salmon. We opposed this unanimously.

Proposal 155, by Jim Smith, seeks to allow the shoreward end of a set gill net to be anchored other than on the beach above low tide. We supported this unanimously.

Proposal 157, by Brian Hartman, seeks to allow two legal limits of set gill net gear to be transported by a single vessel as long as both limited entry permit holders owning the gear are onboard the vessel. We supported this unanimously.

Proposal 158, by Axel Kopun, seeks to increase the maximum length of purse seines from 225 to 250 fathoms in the Eastern, Central, Western, and Perryville Districts of the CMA. We opposed this unanimously.

Proposal 159, by Dan Veerhusen, seeks to change season start dates and allocation between drift gill net and purse seine gear groups in the Dutch Harbor food and bait herring fishery. We voted to support this proposal unanimously at our January meeting.

Proposal 160, to allow pot gear to be longline during the South Alaska Peninsula Area state-waters sablefish fishery. We took no action on this proposal.

Submitted by Patrick Brown, Sand Point AC Chair



Approved by Kylie Thompson

