

Dear Alaska Board of Fish Members,

My name is Andy Wink. I am the Executive Director of the Bristol Bay Regional Seafood Development Association (BBRSDA). The bulk of BBRSDA's activities involve the marketing and promotion of Bristol Bay sockeye salmon. In recent years we have executed retail promotions of Bristol Bay sockeye at over 3,000 stores across the United States and Canada. Accordingly, I'd like to express concerns regarding the Nushagak King Salmon Action Plan, mostly on behalf of millions of sockeye salmon consumers in the U.S. and abroad.

Since 2016, Bristol Bay has accounted for over half of the world's sockeye salmon harvest, making it by far the largest source of premium (sockeye, coho, Chinook), wild salmon. The Nushagak River and its tributaries have been the largest source of sockeye in the Bay during recent years. Sockeye have been proven to be an outstanding source of nutrition while also producing relatively low environmental impacts.

The Nushagak sockeye run is a major source of nutrition and commercial activity, both in Bristol Bay and around the world. I strongly believe the Board of Fish should delay substantive actions pertaining to King salmon management until a future meeting, and ideally until an improved enumeration system can be implemented. We simply do not know – conclusively - whether there is a problem with Nushagak King salmon, or if there is a problem – to what extent. Management changes and even the current regulations can result in enormous volumes of overescapement. This foregone harvest not only diminishes the near-term value and utility of the commercial sockeye fishery, but worse can jeopardize the future productivity of the world's largest source of sockeye salmon. I respectfully request that the Board delay action on the Nushagak King Salmon Action Plan and take up the issue at the March Statewide Board of Fish meeting. This would allow stakeholders more time to review and comment on the Action Plan, and provide both the Board of Fish and ADF&G time to make logical plans going forward.

I would encourage ADF&G to investigate and act on federal grant opportunities, such as NOAA's Pacific Coastal Recovery Fund, which could provide funding for addressing the inadequacies of the Nushagak King enumeration system. Further, on the point of funding sonar and enumeration improvements, any costs put on industry would likely result in costs being passed along to consumers which already pay prices well above farmed Atlantic salmon. I believe current fishery taxes already provide general fund revenue far above what it costs to manage the fishery and perform relevant research, and before these costs are passed onto industry, would ask that a comparative analysis of fishery taxes and fishery management expenses is conducted to assess the tax revenue and fishery expenses in Bristol Bay versus other areas of the state. This would ensure that Bristol Bay is not held to a different standard than other Alaska fishery areas.

Speaking as an individual who has professionally analyzed and reported on the economics of Alaska's seafood industry for many years, I'd like to highlight the economic importance of Bristol Bay's commercial sockeye fishery. Since 2018, Bristol Bay has accounted for roughly HALF of Alaska's entire commercial salmon value (in ex-vessel terms). As a result, Bristol Bay provides a foundation and scale for salmon processing operations around Alaska. It provides the volume and dollars to pay for many of sales, administrative, management, and other expenses necessary to process and sell Alaska salmon products. Therefore, it is again important to avoid inflicting too much damage on the commercial

fishery, as the impacts will likely affect not only commercial salmon fishermen in Bristol Bay but other commercial salmon fishermen on other parts of Alaska.

As a professional fishery analyst, I would also recommend that ADF&G provide what information it can on the catch or harvest per unit of effort in the sport fishery. There are many sport fishermen targeting King salmon every day in the waters we're trying to better understand. While (hopefully) making improvements to the enumeration process/technology, it seems to me that this data may provide some additional visibility about Nushagak King salmon abundance in the near-term. I did not see any of this type of information provided in the Action Plan. A cursory review of sport catch per day fished from Black Point to the mouth of the Mulchatna River shows higher catch rates, (on average) in the 2018-2021 period, compared to the 2012-2015 period. This was surprising to me, though perhaps better data exists within ADF&G or perhaps there is another explanation (aside from there being more kings present than suggested by sonar from 2018-2021). Regardless, given the issues with Nushagak King enumeration, we should be looking hard at any other data points currently available to provide additional context about King salmon abundance/trends.

Additionally, I am curious about whether high sockeye abundance/escapement is having any negative effect on Nushagak King salmon. In recent years, we've seen Nushagak sockeye runs increase substantially, and estimated Nushagak King runs decline sharply – despite management efforts to protect Kings. Are Nushagak King runs declining faster, slower, or about the same as other rivers in Alaska? Unfortunately, due to the imprecise enumeration, we probably can't say for certain, and moreover correlation is not causation. However, as Nushagak sockeye generally run after King salmon, it is logical that they may disturb or otherwise negatively affect King salmon redds and eggs. Also, bear in mind that the lack of sonar coverage across the river channel may be underestimating sockeye escapement too. The point here is: how confident are we that higher overescapement of sockeye do not adversely affect King salmon productivity? This is important because many of the management levers available to ADF&G would likely result in more sockeye going upriver. This could harm not only long-term sockeye productivity, but might it also do *more* harm to King salmon as opposed to getting several thousand more adult Kings upriver? This is an important research question I wish we had information about now, and would encourage the Board to request whatever answers are readily available on the topic, not just from ADF&G but other research teams which operate in Bristol Bay or elsewhere in Alaska.

In conclusion, I just want to plainly state that it is my sincere hope that the Board of Fish and ADF&G can find a solution that improves King salmon productivity without significantly harming the long-term productivity of Nushagak sockeye, and further that if foregone harvest of sockeye needs to be sacrificed in the short-term, it be done so with a level of confidence that the benefits (of putting more Kings upriver) will be worth it. If those goals cannot be achieved, I believe there is grave risk of doing more harm than good in this situation, given our limited data and potentially limited options for improving King salmon abundance.

Thank you for your commitment to preserving the world-renowned sustainability of Alaska salmon fisheries and your consideration of my comments.