Madam Chair and Board Members, I am George Anderson, President of the Chignik Intertribal Coalition.

Inadequate action after repeated disastrous sockeye returns have prompted our communities to organize in conserving our runs. We believe further actions to reduce interception are required to ensure the sustainability of our two main runs. Sockeye salmon is the primary element that ties our subsistence and commercial fisheries together. It's also at the core of maintaining our cultural heritage and community well-being.

Combining and lowering the escapement goals in Chignik to resolve a sustainable fishery policy problem is not a viable option. It neutralizes and eliminates the Department's responsibility to manage for adequate escapement. Lowering the escapement goals only increases the probability of more pressure on the Black lake run. There is no evidence lowering the escapement goals will rebuild the early run, in fact it's contrary to the process. It is scientifically irresponsible after five years of disasters to combine and lower these goals. There is no way to justify the biological consequences of this action. RC 4 undermines the State of Alaska's responsibility of managing for the restoration of the Stock of Management Concern Early run sockeye.

Although the department proposes to manage the early and late runs, we believe this fails to analyze how this change will impact subsistence uses of Chignik early and late run sockeye. We request the board to consider our historic reliance as subsistence users on both the Early and Late runs. Additionally, there are ANS goals for both of these runs that, we believe, must be met.

The defined distinction between the early run and the late run is historically important to Chignik subsistence users and this importance is documented in Subsistence Division reports. This information is entirely absent in staff comments on Prop. 105 and 132 and it is also entirely absent from the draft action plan in RC4.

ADF&G has a statutory obligation to prioritize subsistence uses and has failed to articulate how their proposals to combine management of the early and late runs into a single BEG would prioritize those subsistence uses.

We request that the Board adopt OEGs for early and late runs consistent with historical analyses. Our bottom line is that both the early and late run escapements need protection – how that is achieved and balanced with subsistence and commercial harvesting opportunities is up to you.