

Earl's Alaska BOF Testimony

2/22/2022

I have been involved with Fishery management from the Mexican border to Artic for over 30 yrs.; sitting on the Pacific Council for 10 yrs. and NPFMC for 20 yrs. and involved in development and passage of the Pacific Salmon Treaty. I am currently working with the Chignik Intertribal Coalition. I come before you to voice opposition to RC4, the Action Plan that would codify Proposal 105 to combine Chignik's Early and Late runs as a single escapement goal. This action does not comply with or meet the intent of the Board's RC 104. Rather, it is an intentional decision to disregard the Board's designation of Chignik's Early run as a Stock of Management Concern; the Department cannot adopt a single escapement goal and still claim precautionary management to protect the Early run using the methods they describe (see RC 51, RC 40, PC 150). Nor does the ADF&G illustrate the impacts on subsistence and genetic diversity.

The Department's assumption that productivity of the Early run is down due to a bottleneck in Chignik Lake is fundamentally flawed. Productivity cannot be accurately and confidently known when much of the harvest in Area M and K are excluded from the total harvest determination. Additionally, the Department's run reconstruction that attempts to account for harvest outside the CMA lacks transparency (RC 51, PC 150). Despite the Department's claim that productivity changes are due solely to freshwater changes, marine survival in a changing ocean, and unaccounted harvest are the more likely culprits. (See additional evidence in PC 29). Further, the

supposed bottleneck within Chignik Lake is not new. It is an old issue described by Dr. Dahlberg and Dr. Narver in the 1960's and later by ADF&G staff in various AMRs. What ADF&G does not provide is real information that competition has increased in Chignik Lake since the 1960's.

In 2016 ADF&G's Bristol Bay management agreed to a peer review of their run reconstruction which was embraced by the scientists and the public¹. I propose the Board consider suggesting the Department call for a peer review of their proposed Run Reconstruction and Escapement goal plan to promote transparency and gather public support.

The Board's Sustainable Salmon Fisheries Policy has language intended to guide precautionary management. It has been ignored in favor of the development of Area M fisheries with profound impacts on non-local stocks. PC29 articulates areas in which the Department has allowed expansion permits, time and area harvest of the Area M fishery to infringe on its sustainable salmon policy. At the end of the day, the most beautifully written policy that reflects Alaska as a gold standard of science-driven fisheries management around the world, is meaningless if it isn't followed. (See areas below needing attention.)

¹Cunningham, Curry J., et al. "A general model for salmon run reconstruction that accounts for interception and differences in availability to harvest." *Canadian Journal of Fisheries and Aquatic Sciences* 75.3 (2018): 439-451.

Section 5 AAC 39.222 - Policy for the management of sustainable salmon fisheries

(2) in formulating fishery management plans designed to achieve maximum or optimum salmon production, the board and department must consider factors including environmental change, habitat loss or degradation, data uncertainty, limited funding for research and management programs, existing harvest patterns, and new fisheries or expanding fisheries;

(b) The goal of the policy under this section is to ensure conservation of salmon and salmon's required marine and aquatic habitats, protection of customary and traditional subsistence uses and other uses, and the sustained economic health of Alaska's fishing communities.

(G) depleted salmon stocks should be allowed to recover or, where appropriate, should be actively restored; diversity should be maintained to the maximum extent possible, at the genetic, population, species, and ecosystem levels;

(2)(B) salmon escapement goals, whether sustainable escapement goals, biological escapement goals, optimal escapement goals, or inriver run goals, should be established in a manner consistent with sustained yield; unless otherwise directed, the department will manage Alaska's salmon fisheries, to the extent possible, for maximum sustained yield;

(3) (N) conservation and management decisions for salmon fisheries should take into account the best available information on biological, environmental, economic, social, and resource use factors;

(3)(O) research and data collection should be undertaken to improve scientific and technical knowledge of salmon fisheries, including ecosystem interactions, status of salmon populations, and the condition of salmon habitats;

(3) (P) the best available scientific information on the status of salmon populations and the condition of the salmon's habitats should be routinely updated and subject to peer review;

(4)(D) an understanding of the proportion of mortality inflicted on each salmon stock by each user group, should be promoted, and the burden of conservation should be allocated across user groups in a manner consistent with applicable state and federal statutes, including AS 16.05.251(e) and AS 16.05.258; in the absence of a regulatory management plan that otherwise allocates or restricts harvests, and when it is necessary to restrict fisheries on salmon stocks where there are known conservation problems, the burden of conservation shall be shared among all fisheries in close proportion to each fisheries' respective use, consistent with state and federal law;

(c)(2)(D) salmon escapement should be managed in a manner to maintain genetic and phenotypic characteristics of the stock by assuring appropriate geographic and temporal distribution of spawners as well as consideration of size range, sex ratio and other population attributes;