Misstatements and inaccuracies in Fairbanks AC testimony and RCs:

- Fairbanks AC referred several times to Yukon chum being "a stock of concern." That's false. Neither summer or fall chum have been designated stocks of concern.

- The AC representatives threw out some numbers and they are in RC 86, suggesting that AYK stocks are 27.4% of the CWAK harvest in Area M in 2022. That is not the best available science. The Department has no science that supports those numbers. RC 86 has not been peer-reviewed or vetted by the Department in any way.

- The AC representatives said that 1,693 Yukon fall chum were harvested in Area M in June 2022. The Department's median harvest estimate is 1,522 and that is an estimate based on genetics sampling. The actual harvest could be lower, or higher. We simply don't know. But we do know that 1500 more fish would not have allowed escapement or ANS to be met. We know that if all of those fish made it through Area M in June, they would be swimming a thousand-mile gauntlet of natural and human mortality risks making it certain that not all would reach the Canadian border.

- It bears repeating but the best available science is that genetics sampling can't distinguish between Yukon, Kuskokwim and Nushagak River chum. That's why they are grouped as CWAK chum.
    - Source: ADF&G Special Publication 23-07.

- The AC representatives said that Proposal 140 will make a dent in AYK interceptions in Area M. Again, there is no science that says that Area M catches AYK-bound summer chum. The best science can do is tell us how much CWAK chum we catch, with no way of knowing how much of CWAK is bound for the AYK.

- They said every fish counts when Yukon chum can't meet the sustainable escapement threshold. There is no S.E.T. for any Yukon chum run. 5 AAC 39.222(f)(39) defines SET as a threshold level of escapement established by the department for stocks that have been designated stocks of management or conservation concern. Not the case here as stated above. In fact at the 2023 AYK Board of Fisheries meeting, ADF&G stated that for Yukon summer chum, sustained yield is likely at escapements below the current escapement goal range.
    - Sources:
        - 2023 AYK Meeting RC2, Tab 6 (2023 BOF AYK Escapement Goals_Liller and Savereide 12.15.22)
        - 2023 AYK Meeting RC2, Tab 1(ADF&G FMS 22-08 at p.10)]

- ADF&G has also said that both Yukon summer and fall chum runs have strong cycles of high and low abundance over long periods.
    - Sources:
        - ADF&G FMS 15-07 at p. 15
        - ADF&G SP 22-20

- The AC representatives said that Proposal 140 will dramatically reduce the Area M chum catch in June. With fisherman racing to catch as many fish as they can in limited time and area, we could actually catch more chum than 2022, even with the time limitations. The Board recognized this in **Board Finding 2004-229-FB**, when it determined that the 2001 June management plan substantially reduced sockeye harvest without achieving much reduction in chum harvest. **Quote: The 2001 plan is not very effective for conserving chum salmon.**
    - Source: Board Finding 2004-229-FB

- The AC representatives said that Proposal 140 will ensure more fish on the spawning beds in June in the Yukon. That would only be true if Yukon salmon pass through Area M, and if every fishery north of Area M and west of the Yukon also had time and area restrictions.

- The AC representatives said that all fish bound for CWAK pass through Area M. Again, there is absolutely no science to support that. RC 10 shows the size of the fishery compared to the chum migration paths.

- They said that Area M nets are longer and deeper than any other area. Again, that's something that gets repeated a lot but isn't true, under 5 AAC 09.332. Alaska Peninsula and Chignik maximum seine net depth is 375 meshes, whereas Southeast Alaska maximum depth is 450 meshes. Alaska Peninsula maximum seine length is 250 fathoms, same as Cook Inlet and Southeast Alaska.