

## Comments on Proposal 140

Because the WASSIP studies were unable to identify the CWAK stocks separately the number of AYK fish in the CWAK harvest in Area M is unknown. Any measure such as 140 to curtail chum harvest in June may have little or no impact on the Yukon or Kuskokwim returns. If the more fish that are there then the more will be caught, then there are probably very few AYK chum within the CWAK reporting group.

If I was sitting in your seat I would want to know the savings of CWAK chum I could expect from any plan. Until you can break down the CWAK group into separate reporting groups calculating an estimate of those savings is impossible.

If you impose a plan that expects to help returns in Area M in June, if those fish then cross into Bristol Bay fishing district you can expect your returns to be significantly cut and because they are part of the CWAK reporting group they would simply be counted as CWAK bound for Nushagak.

On the same note Bristol Bay has been failing to meet its chum escapement goals. If you look at the 2022 Bristol Bay season summary, Nushagak river chum escapement was 116,692 fish, the escapement goal was 200,000 fish, the Nushagak harvest was 172,069 fish rather than allowing more fish upriver they were harvested in district, escapement was not met. In 2021 Nushagak escapement was 125,400 fish and Nushagak harvest was 211,400 fish, managers failed to meet escapement goal. In 2019 Nushagak chum harvest was 855,428 chum, and we don't know how many of those fish were bound for AYK. If Bristol Bay decimates their own chum run will Area M be held responsible. If windows are needed in Area M then they must be needed in Bristol Bay also. Bristol Bay is currently only managed for red escapement with no windows for CWAK chum that may be destined the Yukon and Kuskokwim.