

3/27/22

Madam Chairwoman, members of the Board,

My name is Patrick Brown and I am the Chairman of the Sand Point Advisory Committee.

The Sand Point Advisory committee is made up of 6 members. We are primarily commercial fisherman, but we are also hunters and subsistence users. Our members are involved in many fisheries including, but not limited to: Tanner crabbing, Dungeness crabbing, pot cod, trawl cod, jig cod, trawl pollock, long lining, set gill net and purse seining salmon, etc. Many of our community members also drift gill net in Area M, as well as other areas such as Bristol Bay. We live in a remote area which is rich in natural resources, including some of the best feeding and spawning grounds in the world.

Our AC met twice in recent history, once in October 6, 2021, in response to ACRs 6 and 7 which stood before you, and most recently on March 3, 2022, in order to gather commentary from our community in response to Proposal 282, formerly ACR 7, to which we are widely and unanimously opposed.

The RCs are listed under the Sand Point AC Minutes: AC 12

If I could draw your attention to page 7 of our minutes, the Department representative clearly states that this is not a conservation issue. And that if it was, they would have shut down the fishery in 2021 with emergency orders. We are currently not meeting the criteria for stock of concern.

On page 8 of AC 12, another Department representative states that Chignik hasn't reached the threshold to be considered a stock of concern. However, one more poor year will put them in that category. Addressing this issue out of cycle is not prudent to the Board process.

This issue shouldn't have been addressed as an ACR altogether, and the evidence is there that we don't have as huge an impact on Chignik as previously thought.

If you look at page 3, from our March 3 meeting, the Department area biologist stated that it's hard to speak to the effect of what the 2018 and 2020 closures in Area M had on Chignik escapement. If we had a measurable impact on the Black Lake run, it would seem obvious from the results of our closure, but it was not.

This proposal is seeking to put a hard number of 400,000 fish to be escaped into the Black Lake before we can fish in the Shumagins and Dolgoi, but if you look at the history between 1970 and 2020, in the majority of the years (26/50) 400,000 fish didn't even escape into the lake at all. The intent and wording of this proposal is very misleading and is founded in mistruths.

The lower end of the Black Lake SEG is 350,000, and the date for reaching this goal is July 20. If all our fishing time is reduced, we won't even have a chance of seeing the escapement goal to be met before the end of our regularly scheduled season.

If you look toward page 5 of AC12, you will see that the Department has had difficulty seeing correlations between removing the seine fleet from the Dolgoi area, and Chignik escapement. The only really clear impact it has had is that the

amount of seine-caught sockeye in the area has obviously gone down. There is no measurable way to assess the impact as of yet.

We understand that a conservation issue exists in the Black Lake system, but cutting down fishing time in the Shumagin Islands and Dolgoi islands Sections is not the answer. We have executed our fishery simultaneous with the Chignik Management Area (aka CMA or Area L) for over half a century since Limited Entry, and prior to that, vessels were not confined to “areas” and fishermen were able to fish between Chignik all the way to Bristol Bay. 60 plus years ago, people fished 7 days a week. By the 70s, fishing was cut back to 5 days a week. In 1984, The Southeast District Mainland, a stronghold of both the set net and seine community, was allocated to a small portion of the Chignik Run. This essentially displaced dozens of permits and boats to other fishing grounds, namely into the Shumagins, and out toward Dolgoi. Over time, our fishery has continued to be allocated away from us.

This proposal before you seeks to further allocate the fishery. The belief, or idea, is that shutting our fishery down will allow more fish to return to Chignik. No matter which way you twist it, that makes the nature of this proposal allocative, which essentially should make it something that shouldn't be addressed out of cycle.

The 1990s were an especially tough decade for fishermen in Area M. A chum cap on the area coupled with a strict Bristol Bay allocation meant very little fishing time in the Shumagins. Small vessels, namely set netters were the most affected, being less mobile and more susceptible to the harsh weather that frequents the Unimak area.

Meanwhile, the Chignik Area (Area L) has had a successful fishery, with healthy escapement and a healthy harvest. Nothing in this time has changed on either side of the line, until the run failure of 2018.

What happened to the runs of 2018, 2020, and 2021 are anybody's guess. The quantifiable data does not point toward our fishery as having a large impact on Chignik stocks. The further allocation of the Shumagin Islands fishery should not even be considered as the final result of these actions.

Even the best scientific data has no definitive answer for what happened the Black Lake run. However, there are a lot of different factors in consideration of the decline of this stock. The "unknown" factor of the whole situation stands to cripple our entire economy without sufficient evidence to prove that we are making enough of an impact to turn the whole Black Lake run around. Loss of fishing time for us, however, will have consequences which cannot be remedied if this proposal passes.

When the Board accepted ACR 7, it did primarily for a fishery conservation purpose. You would have had to have a direct correlation to fish caught in the Shumagins and Dolgoi areas. Though WASSIP data shows the presence of Black Lake stocks in these areas, the proportions of salmon are very small. Emergency Orders were put in place by the Department in 2018 and 2020. We lost over half of our fishing time in the last 2 openers in June of each of these years. However, the escapement in to Black Lake during this time barely changed as a result of our loss of fishing time.

The consequences of this proposal will have far reaching effects for the fishermen of Area M. There are 391 permits currently in Area M, most of which operate at least partially in the South Peninsula. If you go back to the 80s and

early 90s, the fishery was almost fully utilized. In 2019, 305 out of 391 permits were fished. That's about 78% utilization. At the low point in our fishery, in 2002, before the current schedule was adopted, only 244 of the 395 permits available, were fished. That's about 62% utilization. As you can see, the policies set forth in 1990s had a crippling effect on the fishery and on the economy. We have finally gotten back to a point where our fishery has become profitable again, but we are still quite marginalized with loss of fishing area, namely, SEDM and the Dolgoi section of the South Central District.

Any further loss in fishing time and area will have a huge economic impact, not only on Shumagin Island and Dolgoi area fishermen, but on the fishermen whom we will have to mobilize to the South Unimak area. The reality of this situation is that many of our fishermen will have to move west toward South Unimak in order to remain profitable. This will result in South Unimak fishermen to be compressed into an area which is already fully utilized.

Thank you for your consideration on these matters.

Respectfully,

Patrick Brown

Sand Point AC Chair