



March 10, 2022

Alaska Board of Fisheries  
 Marit Carlson-Van Dort, Chair  
 Via email: dfg.bof.comments@alaska.gov

RE: Opposition to Proposal 282

Chair Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment in advance of the Alaska Board of Fisheries (Board) Statewide shellfish meeting scheduled for March 26 – April 2. The Pacific Seafood Processors Association (PSPA) is a nonprofit seafood trade association representing seafood processing businesses across coastal Alaska, including those that serve fleets in both the Chignik and Area M salmon fisheries. **We respectfully request the Board delay taking action on Proposal 282 and instead consider the proposal during the appropriate in-cycle meeting in 2023.**

Proposal 282 requests further reductions to the fishing periods in the Shumagin Islands and Dolgoi Islands Area and will thus have a significant negative impact on Area M fishermen, processors, and the communities dependent on these fisheries, such as Sand Point and King Cove. These fisheries are critically important to this region, so any further harm should be avoided or at least very carefully considered against other direct impacts.

The Board already (2019) increased the closed areas for all gear types in the South Peninsula June fishery and completely closed the Dolgoi area to seining in June, and there has not been sufficient time for the Board to evaluate whether these actions have had the intended effect on Chignik runs. In addition, there is evidence that a stronger contributor to the strength of the early-run Chignik sockeye fishery seems to be associated with habitat degradation in Black Lake and the corresponding length, weight, and overall condition of out-migrating smolt, which has been poor from 2007 to 2016. The Board should not support a proposal that results in further direct economic harm to the Area M fishery and communities, especially given the lack of clear, corresponding benefit.

There also does not seem to be a downside to delaying review of this proposal until the in-cycle meeting. The proposal is not necessary to address a conservation concern but is allocative in nature according to the ADFG staff comments. Late-run and total escapements were achieved in 2021, and total season sockeye escapement is near the five-year average and increased relative to the three-year average. The ADFG forecast is that Chignik runs will meet escapement in 2022, with an early run of 639,000 sockeye (escapement of 400,000 and harvest of 239,000). If a concern arises, ADFG could continue to use its existing emergency authority to enact further restrictions in Area M, evidenced by

---

[www.pspafish.net](http://www.pspafish.net)

**ANCHORAGE**

721 W. 1st Avenue  
 Suite 100  
 Anchorage, AK 99501  
 907 223 1648

**JUNEAU**

222 Seward Street  
 Suite 200  
 Juneau, AK 99801  
 907 586 6366

**SEATTLE**

1900 W. Emerson Place  
 Suite 205  
 Seattle, WA 98119  
 206 281 1667

**WASHINGTON DC**

20 F Street NW  
 Floor 7  
 Washington, DC 20001  
 202 431 7220

such actions in 2018 and 2020. Given this and given the complexity of salmon management in Areas M and L, it does not seem necessary or prudent to take immediate action at this meeting.

Waiting until the established meeting cycle is not only good public process but it will allow the Board to consider action in the context of ADFG's review of the Chignik escapement goals, which are being completed for the 2023 meeting cycle and may provide relief to Chignik fishermen. This seems like an extremely important factor to consider. In 2023, the Board can consider the full suite of information, including potentially new escapement goals, and all proposals related to these areas relative to each other.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Barrows". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Chris Barrows  
Pacific Seafood Processors Association