

From: [Patrick Brown](#)
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Comments from Sand Point Advisory committee regarding ACRs 6 and 7
Date: Monday, October 18, 2021 2:16:12 PM
Attachments: [Letter to BOF ACRs 6 and 7 2021.pages](#)

10/11/21

Dear Esteemed Members of the Board of Fisheries,

On October 6, 2021, the Sand Point Fish and Game Advisory Committee (AC) met to discuss the merits of ACRs 6 and 7, which seek to restrict fisheries in the South Alaska Peninsula and South Unimak areas. Four of 6 members were present (Patrick Brown, Ben Mobeck Sr., George Gundersen Sr., and Kylie Thompson), as well as ADF&G Staff, including Taryn O'Connor Brito, Lisa Fox, Tyler Lawson, Nat Nichols, Jeff Wadle, and Cassandra Whiteside, as well as guests and community members.

ACRs 6 and 7 seek to modify the South Unimak and Shumagin Islands June Salmon Management Plan, and the Post-June Management Plan for the South Alaska Peninsula. ACR 6 does not provide any detail of what it would like to see specifically change, but ACR 7 does outline a solution that would result in a loss of fishing time for Area M Drifters and Seiners by 66% for the month of June and about a 49% loss of fishing time for the month of July. Area M set netters would stand to lose about 71% of fishing time for the month of June and about 49% for the month of July.

Sand Point AC members voted unanimously not to support ACRs 6 and 7. The reason is that we do not believe they need to ACR Criteria outlined in 5 AAC 39.999.

We do not believe these ACRs address a conservation purpose, correct an error in regulation, or correct an effect on a fishery that was unforeseen when a regulation was adopted. The Management Plans outlined (South Unimak and Shumagin Islands June Salmon Management Plan, and the Post-June Salmon Management Plan for the South Alaska Peninsula [5AAC 09.365, 5 AAC 09.366]) were implemented in 2004, and up until 2018, the Chignik Management Area hasn't had issues with stock escapement as shown. In 2018 and 2020, the ADF&G issued emergency orders which restricted our fishing time, and negligible increases in escapement were realized, with much more harm being done to our fishery as a result of lost fishing time.

The concerns being felt with the Early-run in Chignik are outside of our scope of understanding or control. We have adjusted our schedule, lost fishing time, lost fishing area, and had allocative measures imposed upon us. Every Board of Fish Cycle, we are met with proposals such as this, and for the past several cycles, our Management Plan has been altered to meet the needs of others. These proposals are not a far cry from what we've had to face in the past, and should be addressed in-cycle as they have in the past.

Respectfully,

Sand Point Advisory Committee