

March 11, 2022

Alaska Board of Fisheries
Boards Support Section
PO Box 115526
Juneau, AK 99811
Submitted via email: dfg.bof.comments@alaska.gov

Alaska Board of Fisheries Members,

My name is Troy Denkinger. I am an Alaska resident and commercial fishermen. I have seined in Alaska for decades and currently hold an Area M Seine permit.

I oppose to proposal 282.

Proposal 282 is about allocation, not conservation. The current management plans were considered and adjusted over several board cycles and were developed to provide ADF&G management direction for these mixed stock fisheries in years of high and low abundance. When returns to Chignik are unusually low, ADF&G can use its emergency order authority, as it did in 2018 and 2020, to restrict Area M harvest in an attempt to protect Chignik runs. Given that authority, there is no conservation need to alter the Area M management plans in an out-of-cycle meeting, especially given the Department forecast that the Chignik runs will meet their escapement goals and allow for significant commercial harvests in Chignik in 2022.

During the regular meeting cycle the board will have opportunities to adjust management for these fisheries. These decisions will be better informed with an updated ADFG escapement goal plan for Chignik and comprehensive reports on what is happening in these fisheries. Additionally, the board will have many more proposals and options to consider.

This proposal isn't the solution, but it will cause significant harm to fishermen, processors and communities who heavily rely on these fisheries.

Thank you,

Troy Denkinger