

**Pertaining to Proposals 173 and 175**

The following June 23, 2014 letter to ADF&G from Chignik Regional Aquaculture Association and United Chignik Salmon Fishermen identify that Pink and Chum Salmon management changes **are needed** to avoid economic losses of no less than **\$1.6 million Chum Salmon** and **\$0.5 million Pink Salmon annually** in the Chignik Management Area.

Alaska Department of Fish and Game  
Division of Commercial Fisheries  
351 Research Court  
Kodiak, AK 99615-7400  
Attention: Steve Honnold, Westward Region Supervisor  
and  
Alaska Department of Fish and Game  
Division of Commercial Fisheries  
PO Box 115525  
Juneau, AK 99811-5525  
Attention: Jeff Regnart, C.F. Director

June 23, 2014

Subject: Commercial Fisheries Management - Chignik Pink and Chum Salmon

Dear Steve and Jeff:

On behalf of Chignik commercial fishermen, we respectfully request an independent intra-agency committee be appointed by the Department to address Chignik pink and chum salmon management for the purpose of advancing local-stock harvest opportunities in our area. We believe there is compelling evidence that our local pink and chum runs are consistently being significantly underutilized. The consensus is that more aggressive in-season management strategies by district and bays should and can be effected without compromising pink and chum escapements including Chignik River sockeye goals. Typically non-sockeye comprises about 15% of the total salmon value and on years of low sockeye abundance or poor sockeye prices pink and chum salmon can be economically quite important.

While we are asking for management improvement for pink and chum salmon, we are under no illusion that complete or full utilization of run surpluses are possible. We recognize that a variety of factors affect why Chignik has been experiencing low pink and chum harvest rates. Some is due to market conditions and alternate species availability.

What is clear is that Chignik management practices and philosophies are out of step with the realities of how fishermen and fishing fleets make their business decisions regarding when and where to fish for pinks and chums, resulting in significant lost harvest opportunity for Chignik fishermen. The entrenched opinion of area management, that fishermen should have to call to initiate Department consideration for opening a bay or even a district, is inappropriate; and assuming that a low call-in rate is an accurate indication of interest also misses the mark. Fishermen might fail to call in for many reasons including being busy simply making their business decisions based on the opportunities available and the belief that management commonly has an inadequate response to such requests. We believe that the Department should more proactively identify areas suitable for fishing and open them regardless of whether a fishermen or group of Chignik fishermen have requested such.

Further, we find it unreasonable that a fishery or bay should not be open until escapement is observed. Once fish are readily observable in a stream or closed water area off a stream mouth, typically there is lost harvest opportunity due to fish quality issues and run timing progression. Chignik survey records persistently show escapement well in excess of goals especially for chum salmon.

The pink and chum salmon management plan for the Chignik area harbors some obvious shortfalls. Foremost it is our opinion that escapement goals by district, bay and/or stream should be defined which they are not. As an example, the chum goal for the entire Chignik Management Area (CMA) is a 57.4 thousand fish (peak count). If a single Ivanof Bay stream survey registers a 58 thousand chum salmon count might then the entire CMA be opened for exhaustive fishing extending up to and including the Eastern District (100+ miles east)? Certainly that would not seem reasonable but yet the management plan could be interpreted to imply otherwise. The CMA management plan also makes it unclear as to what levels of CPUE might be used to justify early season openings and/or closures. No one expects the CMA to be 'micro-managed' but we would much like to see an improvement to where the fleet is afforded ample opportunity to harvest chum and pink salmon surplus to escapement needs much more so than has been provided in recent years. As cited earlier, we recommend that districts and certain bays be managed independently and more aggressively than in past seasons. Neither the resource nor Chignik salmon fishermen benefit by too much escapement which unfortunately has become the CMA norm.

Repeatedly, we have cited that Chignik pink and chum salmon escapements have more often than not well surpassed escapement needs (Tables 1-4). For chum salmon it is 100% of the time (Table 1). In numbers, an average of more than 1.2 million chum salmon go unharvested each year or about 4 out of every 5 fish (Table 2). For pink salmon the overage averages nearly 1 million fish representing about one out of every third fish for an average 30% loss (Tables 3-4). The economic value of catching only 50% of the chum salmon surplus reported above is about \$1.6 million and for pink salmon \$0.5 million for a grand total for the two species of \$2,100,000 ex-vessel price (Table 5). This amounts to about thirty thousand dollars per active salmon permit in the CMA. We believe management can turn the tide on this with some direction, and such is well needed now in hopes of our 2014 season being profitable owing to the current failure of our early-run sockeye fishery.

Suggested changes to how Chignik pink and chum salmon stocks are managed include:

1. Have a minimum 72-h minimum weekly opening in at least a portion of all bays (known to support pink and/or chum runs) from early July to late-August with Chignik Bay the exception.
2. Extend fishing time in bays if aerial survey or other data indicate that escapement (s) will be met.
3. Reinstate the historic location of closed water markers at Ivanof Bay which may be the single most egregious example of lost harvest opportunity (Attachment A).
4. Define specific escapement goals for pink and chum salmon at minimum by district and preferably by bay or bay aggregate (group).
5. Terminate the requirement that fishermen must call the Chignik weir for an opening—be proactive.
6. Terminate the requirement that fishermen need to 'prove' that they have a buyer; recognize that that is a fishermen's responsibility solely and be prepared to cite anyone found discarding salmon; make this abundantly known to the fleet.
7. Philosophically understand that Chignik pink and chum salmon are to be discreetly managed and not merely as a bycatch of a well-managed Chignik sockeye salmon fishery. Also, recognize that closed water areas in bays and off stream mouths are intended to naturally serve as an escapement refuge, and outer bays are harvest areas needing to be consistently fished to ensure adequate harvest opportunity and acceptable fish quality.

8. Post-season: (1) Identify fishery performance relative to the strength of the pink and chum runs. Go beyond citing peak escapement counts to where estimates of total escapements are computed therein permitting the generation of run numbers and exploitation rates by species. Further, apply basic standards to where escapement reports do not mix or cite calculations of total escapement estimates with peak count totals or sums. (2) Routinely address the effectiveness of closed-water areas so as to provide a basis for justifying future expansions or reductions as may be needed to ensure proper escapement and/or greater harvest opportunity.

Note the above are suggestions which are intended to spur critical thinking on ways to improve Chignik pink and chum salmon management. Aside from considering those suggestions we recommend that you contact the following Chignik fishermen for their personal insight: Auggie Pedersen, Gary Anderson, George Anderson, Al Anderson, Alfredo Abou-eid, Ernie Carlson, Paul Johnson, and Axel Kopun. Those and others support proactive management of the two species, pinks and chums, and are not satisfied with the status-quo.

Thank you for considering this request to improve harvest opportunities and escapement reporting for Chignik area pink and chum salmon.

Sincerely,



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Attached: Tables 1-5; Attachment A

Table 1. Estimated chum salmon escapement and management goal numbers, Chignik Management Area 2007-2013.

Year	Indexed Escapement (fish #'s)	Indexed Escap. Goal (fish #'s)	Est. Total Escap. (Index X 7 per Wassip) (fish #'s)	Escap. Goal Total # Fish (index X 7)	Surplus (Est. Total Escap. less Escap. Goal)
2007	238,098	57,400	1,666,686	401,800	<b>1,264,886</b>
2008	197,259	57,400	1,380,813	401,800	<b>979,013</b>
2009	214,959	57,400	1,504,713	401,800	<b>1,102,913</b>
2010	177,220	57,400	1,240,540	401,800	<b>838,740</b>
2011	278,145	57,400	1,947,015	401,800	<b>1,545,215</b>
2012	210,973	57,400	1,476,811	401,800	<b>1,075,011</b>
2013	335,907	57,400	2,351,349	401,800	<b>1,949,549</b>
<b>Average</b>					<b>1,250,761</b>

Table 2. Comparison of the actual chum harvest against the estimated maximum available harvest, CMA, 2007-13.

Year	CMA Total Catch	Est. Maximum Available Harvest (catch +surplus)	CMA Total Catch. /Max. Available Harvest
2007	78,553	1,343,439	5.8%
2008	209,325	1,188,338	17.6%
2009	256,425	1,359,338	18.9%
2010	581,329	1,420,069	40.9%
2011	269,503	1,814,718	14.9%
2012	171,112	1,246,123	13.7%
2013	154,425	2,103,974	7.3%
<b>Average</b>			<b>17.0%</b>

Source: 1. Expansion factor of 7 from ADF&G Special Public. No. 12-2 (Eggers et. al., 2012).  
 2. Catch and Escap. numbers from Fishery Mgmt. Report No. 13-43 (Anderson et. al., 2013).

Table 3. Estimated pink salmon escapement and management goal numbers, Chignik Management Area 2007-2013.

Year	Peak Count Escapement (fish #'s)	Escapement		Est. Total Escap. (Peak C. X 3.75) (fish #'s)	Escap. Goal Total (midpoint Index X 3.75)	Surplus (Est. Total Escap. - Mid-Pt. Escap. Goal)
		Index Goal Lower	Upper			
2007	1,217,064	500,000	800,000	4,563,990	2,437,500	2,126,490
2008	863,031	200,000	500,000	3,236,366	1,312,500	1,923,866
2009	869,063	500,000	800,000	3,258,986	2,437,500	821,486
2010	333,570	200,000	500,000	1,250,888	1,312,500	0
2011	986,248	500,000	800,000	3,698,430	2,437,500	1,260,930
2012	302,699	200,000	500,000	1,135,121	1,312,500	0
2013	863,991	500,000	800,000	3,239,966	2,437,500	802,466
<b>Average</b>						<b>990,748</b>

Table 4. Comparison of the actual pink harvest against an estimate of the maximum available harvest, CMA, 2007-13.

Year	CMA Total Catch	Est. Maximum Available Harvest (catch +surplus)	CMA Total Catch. /Max. Available Harvest
2007	2,019,748	4,146,238	48.7%
2008	2,389,958	4,313,824	55.4%
2009	1,408,339	2,229,825	63.2%
2010	489,781	489,781	100.0%
2011	905,166	2,166,096	41.8%
2012	137,706	137,706	100.0%
2013	871,503	1,673,969	52.1%
<b>Average</b>			<b>65.9%</b>

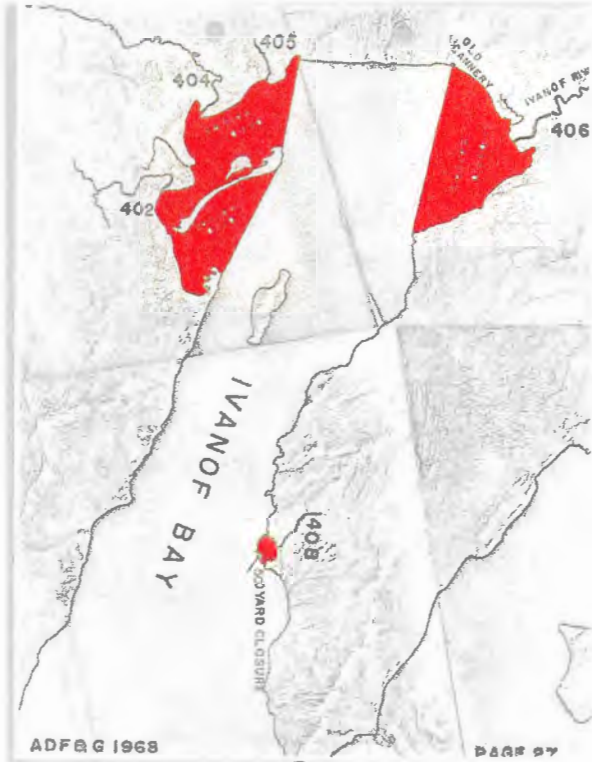
- Source: 1. Expansion factor of 3.75 from ADF&G Regional Rpt. 2A98-42 (S. Fried et. al., 1998).  
 2. Catch and Escap. numbers from Fishery Mgmt. Report No. 13-43 (Anderson et. al., 2013).
- Notes: 1. Even Yr. Escap. Goal 200-600k; Odd Yr. Escap. Goal 500-800k  
 2. Surplus: in excess of escapement goal midpoint.

Table 5. 2013 chum and pink salmon catch in numbers of fish and values, and 50% of the estimated value of the average annual unharvested component (2007-13).

Species	2013 CMA Fishery			50% of Estimated Value of Unharvested Fish (2007-13)
	Total Catch (# of fish)	Total Catch Value	Avg. Fish Value	
Chum	154,425	\$384,458	\$2.49	\$ 1,556,953
Pink	871,503	\$867,778	\$1.00	\$ 493,257

Source: Based on Fishery Mgmt. Rpt. No. 13-43 (Anderson et. al., 2013) data.

Attachment A. Map depicting the 1968 Ivanof Bay closed waters area and a map showing the current Ivanof Bay closed waters area.



Note that in 1968 the default closed waters area, shown at left, is much smaller than today's default closed area, shown below. On the larger and older map at left today's line would roughly run through the middle of the prominent Island (Rhode Island) in mid-Ivanof Bay. While under some circumstances the Rhode Island markers are appropriate they are not appropriate as default markers and virtually guarantee very significant lost harvest opportunity on Ivanoff River chums and pinks.

