

*Area M Seiners Association
Opposition to Proposals 136, 137 & 138*

Introduction

Proposals 136, 137, and 138 are premised on claims of excessive harvests of Chignik-bound sockeye in the South Peninsula June and Post-June fisheries. These proposals allege that harvests in the June and Post-June fisheries, especially those in the Dolgoi Island Area, threaten the conservation of Chignik sockeye runs and a claimed harvest preference for the Chignik Management Area (CMA) with respect to those runs.

This RC provides a response to these Proposals and the claims on which they are based. The best available data do not support the claims of excessive harvests of Chignik-bound sockeye in the South Peninsula June and Post-June fisheries. To the contrary, they show that the current management plans for the June and Post-June fisheries, 5 AAC 09.365 & 366, respectively, coupled with the Department's emergency order authority, have ensured the conservation of Chignik sockeye runs and allocated the large majority of the harvest of those runs to CMA fisheries.

These proposals are not needed for conservation. Instead, as the Department has recognized, they are allocation proposals (*see* RC2, pages 22, 27, 30) that would simply allocate an even greater share of Chignik sockeye runs to CMA fisheries and deprive historic South Peninsula fisheries of the opportunity to harvest a small portion of those runs as well as other stocks harvested with them in traditional mixed-stock fisheries.

The WASSIP Study

Proposals 137 and 138 both cite the Western Alaska Salmon Stock Identification Program (WASSIP) study in support of their claims of excessive harvests of Chignik-bound sockeye in the Dolgoi Island Area fishery. They specifically cite the WASSIP study for the proposition that Chignik-bound sockeye were over-exploited in 2007 and 2008, years when they allege the Chignik runs were failing. They also claim that the WASSIP study makes it evident that about half the sockeye harvested in the Dolgoi Island Area are Chignik-bound sockeye and should therefore be subject to the same restrictions as the SEDM and Igvak fisheries.

The WASSIP study does not support these claims. The following table contains data reported in the WASSIP study and the Department's 2018 Chignik Management Report. The WASSIP study covered three years: 2006, 2007, and 2008. We include all three years here, including the two years (2007 and 2008) that are mentioned in Proposal 137 and 138 as years in which the Chignik runs were failing and Chignik failed to achieve its alleged minimum harvest preference. As used in WASSIP, the Chignik Reporting Group includes the early (Black Lake) and late (Chignik Lake) runs.

Year	2006	2007	2008
<i>Dolgoi Island Area</i>			
Total Dolgoi Area Harvest¹	June: 243,217 Post-June: 246,221 Total: 489,438	June: 80,299 Post-June: 233,367 Total: 313,666	June: 35,339 Post-June: 55,799 Total: 91,137
Dolgoi Area Harvest of Chignik Reporting Group²	June: 170,920 Post-June: 164,949 Total: 335,869	June: 18,226 Post-June: 86,751 Total: 104,977	June: 12,168 Post-June: 26,376 Total: 38,544
Dolgoi Area Harvest of Chignik Reporting Group as a Percent of Total Dolgoi Area Harvest	June: 70.1% Post-June: 67.0% Both: 68.6%	June: 22.7% Post-June: 37.2% Both: 33.5%	June: 34.4% Post-June: 47.3% Both: 42.3%
Dolgoi Area Harvest Rate on Chignik Reporting Group³	June: 7.4% Post-June: 7.1%	June: 1.1% Post-June: 5.3%	June 0.8% Post-June 1.7%
<i>Chignik Management Area</i>			
Total Chignik Management Area (CMA) Harvest⁴	902,709	834,547	687,270
CMA Harvest of Chignik Reporting Group⁵	871,286	746,428	628,269
CMA Harvest of Chignik Reporting Group as a Percent of Total CMA Harvest	96.5%	89.4%	91.4%

¹ These data are from Habicht et al., Harvest and Harvest Rates of Sockeye Salmon Stocks in Fisheries of the Western Alaska Salmon Stock Identification Program, ADF&G Special Publication No. 12-24 (Nov. 2012) (hereafter, WASSIP), Page 22 and Tables 27-29 (June Fishery), Page 24 and Tables 39-41 (Post-June Fishery).

² These data are from WASSIP, Page 22 and Tables 27-29 (June Fishery), Page 24 and Tables 39-41 (Post-June Fishery).

³ These data are from WASSIP, Page 22 and Tables 27-29 (June Fishery), Page 24 and Tables 39-41 (Post-June Fishery).

⁴ These data are from WASSIP, Page 19-20 and Tables 6-14, and combine the data for all districts in the Chignik Management Area (Central District, Chignik Bay District, and Western and Perryville District).

⁵ These data are from WASSIP, Page 19-20 and Tables 6-14, and combine the data presented in the WASSIP study for all districts in the Chignik Management Area (Central District, Chignik Bay District, and Western and Perryville District).

CMA Harvest Rate on Chignik Reporting Group⁶	37.7%	45.3%	40.1%
<i>Chignik Management Area vs. Dolgoi Island Area</i>			
CMA Harvest vs. Dolgoi Harvest of Chignik Reporting Group	2.6 times larger	7.1 times larger	19.6 times larger
<i>Chignik Escapements</i>			
Chignik Early Run Escapement (<i>early- run SEG = 350,000- 400,000</i>)⁷	366,497	361,001	377,579
Chignik Late Run Escapement (<i>SEG = 250,000-400,000</i>)⁸	368,996	293,883	328,479

Thus, despite the claims in Proposals 137 and 138, these data show that the Chignik early and late runs met their escapement goals in all three years of the WASSIP study, including the two years in which Proposal 137 and 138 claim there was a run failure. The sustainable escapement goal range for the early run in these years was from 350,000 to 400,000 fish. In 2006, 2007 and 2008, the early run escapements were 366,497, 361,001, and 377,579 fish, respectively, squarely within the SEG range each year. Similarly, the sustainable escapement goal range for the late run (including a 50,000 fish goal to meet late season subsistence needs for in-river fisheries) was from 250,000 to 400,000 fish. In 2006, 2007 and 2008, the late run escapements were 368,996, 293,883 and 328,479 fish, respectively, also squarely within the SEG range each year.

Further, these data show that the Chignik Management Area harvested more than 600,000 sockeye in all three years of the WASSIP study, including the two years in which Proposal 137 and 138 argue Chignik's claimed minimum harvest preference of 600,000 fish was somehow compromised. Total Chignik Management Area sockeye harvests ranged from 687,270 fish in 2008, to 902,709 fish in 2006, more than 50% above the claimed minimum harvest preference. Moreover, in each year of the WASSIP study, the Chignik Management Area harvest of Chignik

⁶ These data are from WASSIP, Page 19-20 and Tables 6-14, and combine the data for all districts in the Chignik Management Area (Central District, Chignik Bay District, and Western and Perryville District).

⁷ These data are from the Department's 2018 Chignik Management Report ((Wilburn and Renick, Chignik Management Area Salmon Annual Management Report, 2018, ADF&G Fishery Management Report No. 18-32 Dec. 2018) (hereafter, 2018 Chignik Management Report), Page 27, Table 7. Until 2013, the early-run escapement goal was a sustainable escapement goal of 350,000 to 400,000 fish. Wilburn et al., Chignik Management Area Salmon Annual Management Report, 2014, ADF&G Fishery Management Report No. 15-28 (May 2015) (hereafter, 2014 Chignik Management Report), at Page 5.

⁸ These data are also from the 2018 Chignik Management Report, Page 27, Table 7. The late-run escapement goal includes an in-river goal for late season subsistence needs that is added to the lower bound of the late-run SEG range of 200,000 to 400,000 fish. Until 2016, the in-river run goal was 50,000 fish, yielding an SEG range for the late run of 250,000 to 400,000 fish. *Id.* at Page 4.

Reporting Group sockeye vastly exceeded the harvest in the Dolgoi Island Area, by a factor of 2.6 times larger in 2006 to a factor of almost 20 times larger in 2008.

Similarly, the Chignik Management Area's harvest rate on the Chignik Reporting Group was far larger than the Dolgoi Area's harvest rate on the Chignik Reporting Group in each year. The harvest rate on the Chignik Reporting Group in the Chignik Management Area ranged from 37.7% to 45.3% during the WASSIP study. In contrast, the harvest rate on the Chignik Reporting Group in the Dolgoi Area ranged from 0.8% to 7.4% in the June fishery and 1.7% to 7.1% in the Post-June fishery. Even if the June and Post-June fisheries were combined, that harvest rate in the Chignik Management Area substantially exceeded the harvest rate in the Dolgoi Area in each year, by factors of 2.6, 7.1 and 16 times larger.

These data are flatly inconsistent with the claims in Proposals 137 and 138 that the Dolgoi Area is not sharing in the conservation burden or is somehow threatening the claimed harvest preference for the Chignik Management Area.

Proposals 137 and 138 also claim that the WASSIP study established that about half of the Dolgoi Area sockeye harvest comprises Chignik-bound fish. However, while fish from the Chignik Reporting Group comprised more than half (68.6%) of the Dolgoi sockeye harvest in 2006, they comprised well under half of the Dolgoi sockeye harvest in 2007 and 2008 (33.5% and 42.3%, respectively). There is no scientific basis for simply averaging those numbers to project stock composition in the Dolgoi fishery in other years. If anything, these numbers suggest that in years when the Chignik runs are relatively weak they will comprise well less than half of the Dolgoi harvest.

Moreover, the percentage of Chignik-bound sockeye in the Dolgoi Area fishery is substantially less than the estimates on which the Board has relied in the past to manage other areas based on Chignik Management Area returns and harvests. For example, 5 AAC 09.360(f) asserts that the estimate of sockeye salmon destined for the Chignik River "has been determined to be 80 percent of the sockeye salmon harvested in the East Stepovak, Stepovak Flats, Southwest Stepovak, Balboa Bay, and Beaver Bay Sections, and before July 1 in the Northwest Stepovak Section." There is no evidence that the sockeye salmon destined for the Chignik River has ever comprised 80 percent of the sockeye salmon harvested in the Dolgoi Island Area, and WASSIP shows that it is far less than that.

More importantly, the stock composition numbers do not mean that the Dolgoi fishery is either preventing the Chignik runs from meeting their escapement goals or depriving the Chignik Management Area fisheries of their claimed minimum harvest preference. As discussed above, that was not the case in any of the WASSIP years.

Proposal 136 does not mention the WASSIP study, but claims that: (1) Chignik-bound sockeye are harvested continuously throughout the month of June as they pass the Southwestern District, the West and East Pavlof Bay Sections of the South Central District, and the Shumagin Islands; and (2) this has resulted in a tremendous surge in the interception of Chignik-based sockeye, which are abundant in the area at this time. Nothing in the WASSIP study supports these claims. As noted above, during the WASSIP study the harvest rate on Chignik Reporting Group sockeye in

the Dolgoi Island Area (including the Southwestern District and the West and East Pavlof Bay Sections of the South Central District) ranged from only 0.8% to 7.4% in the June fishery. This is not evidence of either continuous harvest or a tremendous surge in interception of Chignik-bound sockeye.

The same is true for the Shumagin Islands. The following table shows the harvest rates in the Shumagin Islands Section on the Chignik Reporting Group as reported in the WASSIP study:

Year	2006	2007	2008
Shumagin Islands Harvest Rate on Chignik Reporting Group⁹	June: 3.3% Post-June: 3.7%	June: 1.4% Post-June: 2.1%	June 1.8% Post-June 4.0%

Thus, in the June fishery, which is the focus of Proposal 136, harvest rates in the Shumagin Islands Section on Chignik-bound sockeye ranged from only 1.4% to 3.3%. These harvest rates do not demonstrate either a continuous harvest or a tremendous surge in interception of Chignik-bound sockeye.

It is important to keep in mind, as discussed above, that in each of these years Chignik's early and late runs each met their escapement goals and the Chignik Management Area exceeded its claimed minimum harvest preference of 600,000 fish. Indeed, as discussed below, there is no evidence in Chignik Management Area escapement or harvest data of an increasing – let alone a tremendous surge in – interception of Chignik-bound sockeye.

Escapements and Harvests in 2014, 2016 and 2017

Proposals 137 and 138 also cite harvests in 2014, 2016 and 2017 in support of new restrictions on the Dolgoi Island Area fishery. However, like the years involved in the WASSIP study, the Chignik early and late runs met their escapement goals in each of these years, the Chignik Management Area achieved its claimed minimum harvest preference of 600,000 fish, and its harvests exceeded the total harvests in the Dolgoi Area.

In the absence of a study like WASSIP, we do not know what proportion of the Dolgoi Area harvested comprised Chignik-bound fish or the harvest rate on Chignik-bound sockeye in the Dolgoi Area fishery in these years. However, it should be noted that, in each of these years, the Bristol Bay sockeye runs were at record or near-record levels, and likely comprised a significant portion of the Dolgoi Area harvest. The total inshore run size for Bristol Bay in 2014, 2016 and 2017 was 41,149,458, 51,654,253, and 59,386,103 fish, respectively, well above the 1997-2016 average of 34,856,710 fish and the 2007-2016 average of 40,323,132 fish.¹⁰

⁹ These data are from WASSIP, Page 21-22 and Tables 24-26 (June Fishery), Page 23 and Tables 36-38 (Post-June Fishery).

¹⁰ Elison et al., 2017 Bristol Bay Area Annual Management Report, ADF&G Fishery Management Report No. 18-11 (May 2018) at Page 78, App. A11.

Also, it is clear from the harvest data (showing that larger numbers of sockeye were harvested in the Chignik Management Area than in the Dolgoi Island Area) that the harvest rate in the Chignik Management Area on Chignik-bound sockeye was larger than the harvest rate in the Dolgoi Island Area on those fish. Since only a fraction of the Dolgoi Island Area harvests comprised Chignik-bound fish, the factor by which harvests of Chignik-bound sockeye in the Chignik Management Area exceeded those in the Dolgoi Island Area was even larger than that shown in the following table.

The following table provides the harvest data for these three years:

Year	2014	2016	2017
<i>Dolgoi Island Area</i>			
Total Dolgoi Area Harvest	306,208 ¹¹	541,398 ¹²	387,125 ¹³
<i>Chignik Management Area</i>			
Total Chignik Management Area (CMA) Harvest¹⁴	902,709	834,547	687,270
<i>Chignik Management Area vs. Dolgoi Island Area</i>			
Total CMA Harvest vs. Total Dolgoi Harvest	2.9 times larger	1.5 times larger	1.8 times larger
<i>Chignik Escapements</i>			
Chignik Early Run Escapement (early-run BEG = 350,000-450,000)¹⁵	360,381	418,290	453,257

¹¹ This figure is from the Department's 2014 Management Report for the South Alaska Peninsula (Keyse and Fox, South Alaska Peninsula Salmon Annual Management Report, 2014, ADF&G Fishery Management Report No. 15-35, Sept. 2015). It is the sum of the sockeye harvests reported in Appendix A14 for the South Central District (Statistical Areas 283-15, 17, 20, 21, 23, 24, 25 & 26) and portions of the Southwestern District (Statistical Areas 284-36, 37, 38, 39 & 42).

¹² This figure from the Department's 2016 Management Report for the South Alaska Peninsula (Fox et al., South Alaska Peninsula Salmon Annual Management Report, 2016, ADF&G Fishery Management Report No. 17-33, Aug. 2017). It is the sum of the sockeye harvests reported in Appendix A14 for the South Central District (Statistical Areas 283-15, 17, 20, 21, 23, 24, 25 & 26) and portions of the Southwestern District (Statistical Areas 284-36, 37, 38, 39 & 42).

¹³ This figure is from the Department's 2017 Management Report for the South Alaska Peninsula (Fox et al., South Alaska Peninsula Salmon Annual Management Report, 2017 and the 2016 Subsistence Fisheries in the Alaska Peninsula, Aleutian Islands, and the Atka-Amlia Islands Management Areas, ADF&G Regional Information Report No. 4K18-05, Apr. 2018). It is the sum of the sockeye harvests reported in Appendix A14 for the South Central District (Statistical Areas 283-15, 17, 20, 21, 23, 24, 25 & 26) and portions of the Southwestern District (Statistical Areas 284-36, 37, 38, 39 & 42).

¹⁴ These data are from the Department's 2018 Chignik Management Report, Page 37, Table 15.

¹⁵ These data are from the Department's 2018 Chignik Management Report, Page 27, Table 7. Since 2013, the early run has had a biological escapement goal of 350,000 to 450,000 fish. 2014 Chignik Management Report at Page 5.

Chignik Late Run Escapement <i>(late-run SEG in 2014 = 250,000-400,000; late-run SEG in 2016 & 2017 = 275,000-400,000)¹⁶</i>	291,228	348,023	339,303
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Proposals 137 and 138 also complain that the Board's 191,000 fish trigger for closing a portion of the Dolgoi Island Area did not work as intended. However, the trigger was never intended to close the entire area or to limit the entire area to a harvest of 191,000 sockeye. *See* 5 AAC 09.35(f) and 5 AAC 09.366(j). As the above data indicate, Dolgoi Island Area harvests in 2016 and 2017 did not prevent either Chignik run from meeting its escapement goal or prevent the Chignik Management Area from achieving its claimed minimum harvest preference of 600,000 fish. The Proposals' invocation of 2017 as the basis for imposing further restrictions on the Dolgoi Island Area fishery is especially ironic given the Chignik Management Area's harvest of a record 7,077,924 pink salmon (6.1 times the 1998-2017 average) and 609,236 chum salmon (3.6 times the 1998-2007 average) in that year.¹⁷

Escapements and Harvests in Other Years

Proposals 136, 137 and 138 do not mention escapements or harvests in any other years. The data show that, until 2018, both Chignik runs consistently met their escapement goals and the Chignik Management Area consistently achieved its claimed minimum harvest preference. Despite this, Proposal 136 would restrict fishing opportunity in the South Peninsula June Fishery in *every year*, that is, it would restrict fishing opportunity in the South Peninsula June Fishery even in years in which there is no conservation concern for either Chignik run and in which there is no basis for re-allocating fish to the Chignik Management Area. Similarly, Proposals 137 and 138 would restrict the Dolgoi Island Area fishery in *every year*, even in years in which there is no conservation concern for either Chignik run and in which there is no basis for re-allocating fish to the Chignik Management Area.

These restrictions are completely unjustified and would cause substantial economic harm to South Peninsula fishermen, processors and communities. The current management plans for the South Peninsula June and Post-June fisheries – *coupled with the Department's emergency order authority* – provide a better approach to addresses the concerns raised in Proposals 136, 137 and 138. As 2018 illustrates, the Department can issue emergency orders to restrict fishing in the South Peninsula fisheries when there are bona fide concerns about the size of the Chignik runs. That approach is tailored to actual in-season concerns and does not penalize the South Peninsula fisheries when there are no such concerns, as Proposals 136, 137 and 138 would do.

¹⁶ These data are also from the Department's 2018 Chignik Management Report, Page 27, Table 7. The late-run escapement goal includes an in-river goal for late season subsistence needs that is added to the lower bound of the late-run SEG range of 200,000 to 400,000 fish. Until 2016, the in-river run goal was 50,000 fish, yielding an SEG range for the late run of 250,000 to 400,000 fish. 2018 Chignik Management Report at Page 4. Since 2016, the in-river run goal has been 75,000 fish, yielding an SEG range for the late run of 275,000 to 400,000 fish. *Id.*

¹⁷ 2018 Chignik Management Report, Page 37, Table 15.

We provide Chignik Management Area escapement and harvest data for 2004 through 2018 in the following table along with average escapement and harvest numbers for the periods 1998-2017, 2008-2017 and 2013-2017.¹⁸ These years cover the entire period since the adoption of the current framework for the South Peninsula June Fishery Management Plan in 2004. As noted above, Chignik's current early run biological escapement goal is a range from 350,000 to 450,000, and its current late run sustainable escapement goal is a range from 275,000 to 400,000 (including an in-river run goal of 75,000 fish for late season subsistence needs that is added to the lower bound of the late-run SEG range of 200,000 to 400,000 fish), with a combined goal of 625,000 to 850,000.¹⁹ There were two changes in these goals during the years shown in the table. First, until 2013, the early-run escapement goal was a sustainable escapement goal of 350,000 to 400,000 fish.²⁰ Second, until 2016, the in-river run goal was 50,000 fish, yielding an SEG range for the late run of 250,000 to 400,000 fish.²¹ In the following table, escapements above the ranges in effect for each year are shown in blue, those within the applicable ranges are shown in green, those within the applicable ranges without counting the in-river run goal are shown in pink, and those below the ranges are shown in red.

Year	Early Run Escapement	Late Run Escapement	Total Escapement	Chignik Management Area Harvest
2004	363,800	214,459	578,259	704,652
2005	355,091	224,366	580,457	1,152,133
2006	366,497	368,996	735,317	902,709
2007	361,091	293,883	654,974	834,547
2008	377,579	328,479	706,058	687,270
2009	391,476	328,586	720,062	1,198,105
2010	432,535	311,291	743,826	1,379,785
2011	488,930	264,887	753,817	2,497,004
2012	353,441	358,948	712,389	1,800,121
2013	386,782	369,319	756,101	2,405,151
2014	360,381	291,228	651,609	620,339
2015	534,088	589,810	1,123,898	1,552,495
2016	418,290	348,023	766,313	1,394,091
2017	453,257	339,303	792,560	897,489
2018	263,979	275,718	539,697	128

¹⁸ The 2009-2018 annual data and the 1998-2017, 2008-2017 and 2013-2017 averages are from the 2018 Chignik Management Report, Page 27, Table 7 (escapement data) and Page 37, Table 15 (harvest data). The 2004-2008 annual data are from the Department's 2013 Chignik Management Report (Anderson et al., Chignik Management Area Salmon Annual Management Report, 2013, ADF&G Fishery Management Report No. 13-43 (Nov. 2013), Page 17, Table 7 (escapement data) and Page 22 (Table 10) (harvest data).

¹⁹ 2018 Chignik Management Report at Page 4.

²⁰ 2014 Chignik Management Report at Page 5.

²¹ Wilburn and Renick, Chignik Management Area Salmon Annual Management Report, 2018, ADF&G Fishery Management Report No. 18-32 (Dec. 2018) at Page 4.

1998-2017 Avg	426,109	326,065	752,175	1,381,726
2008-2017 Avg	419,676	352,987	772,663	1,443,185
2013-2017 Avg	430,560	387,537	818,096	1,373,913

As these data show, the Chignik early and late runs have consistently met or exceeded their escapement goals. The late run was slightly below the combined SEG and in-river run goal in 2004, 2005, and 2011. However, in 2005, the Chignik Management Area harvest exceeded 1,100,000 fish, and in 2011 the Chignik Management Area harvest was nearly 2,500,000 fish. It is not reasonable to attribute the failure to meet the combined SEG and in-river run goal for the late run on harvests in other areas under these circumstances. In 2018, both the early and late runs were very weak, and yet the late run still met its escapement goal. *In every other year, both runs met or exceeded their escapement goals.*

Moreover, the average annual harvests in the Chignik Management Area were more than 1,400,000 sockeye from 2008 to 2017, and more than 1,370,000 sockeye from 2013 to 2017. Those averages are similar to or higher than the long-term average from 1998 to 2017.

These data provide no evidence of increasing interceptions in South Peninsula fisheries and no basis for imposing new and draconian restrictions on the entire South Peninsula or Dolgoi Area fishery in *every year*. Proposals 136, 137 and 138 seize on natural fluctuations in harvest levels – and their proponents will no doubt now seize on the weakness of the 2018 runs – to re-allocate fish in *every year*, including the vast majority of years in which Chignik escapements are met and Chignik Management Area harvests are within long-term averages.

The Department's Emergency Order Authority

Proposals 136, 137 and 138 claim there are no mechanisms in the current South Peninsula June and Post-June Management Plans to ensure the conservation of Chignik sockeye. However, in addition to limited fishing periods and other restrictions in the plans, the Department's emergency order authority is available to restrict the South Peninsula fisheries, including the Dolgoi Island Area fishery, in years with bona fide concerns about the strength of the Chignik runs. This was illustrated in 2018, when the Department restricted fishing time in the South Peninsula fisheries for all gear types and closed the Dolgoi Island Area in response to weak returns to the Chignik River. As the Department explained in its 2018 South Alaska Peninsula Management Report:

In 2018, on June 18 the Chignik River sockeye salmon escapement was the lowest recorded escapement in the history of the Chignik River weir operation. In response to the record low Chignik River sockeye salmon escapement, ADF&G reduced the last 2 fishing periods in the *South Unimak and Shumagin Island June Salmon Management Plan* for all gear types to 40-hours each. This was a reduction of 72 hours for set gillnet gear and 96 hours for seine and drift gillnet gear. Additionally, ADF&G closed the “Dolgoi Island area” for all openings after June 18. On July 17, the board met to hear emergency petitions regarding the Chignik River sockeye salmon escapement. The board determined that the Southeastern District Mainland and the “Dolgoi Island area” would remain closed until the Chignik Lake sockeye salmon interim escapement objectives were met, through August 8.

The “Dolgoi Island area” … remained closed through July 25 and reopened on July 26 when Chignik River escapement objectives were met.²²

The following table provides harvest data for the Dolgoi Island area in 2017 and 2018 and demonstrates that the Department’s actions resulted in a dramatic reduction in the 2018 harvest:

District	Section	Statistical Areas	2017 ²³	2018 ²⁴
South Central	Mino Creek – Little Coal Bay	283-15, 283-17	53,390	2,457
	East Pavlof Bay	283-20, 283-21, 283-23	37,739	1,596
	Canoe Bay	283-24	1,801	86
	West Pavlof Bay	283-25, 283-26	130,334	7,791
Southwestern	Volcano Bay	284-36, 284-37, 284-38, 284-39	132,726	33,172
	Belkofski Bay	284-42	31,135	6,211
Dolgoi Island Area Total			387,125	51,313

These data show that the Dolgoi Island Area harvest was reduced by 335,812 fish from 2017 to 2018, a reduction of 87%. And, of course, not all the sockeye that were harvested were Chignik-bound sockeye. Given that the WASSIP study indicated that the proportion of Chignik Reporting Group sockeye in the Dolgoi Area fishery was well under 50% in years in which the Chignik runs were relatively weak and given that the Dolgoi Island Area was entirely closed from June 18 thought July 25 in 2018, it is likely that most of the fish that were harvested in the Dolgoi Island Area in 2018 were *not* Chignik-bound sockeye.

Under these circumstances, it is simply not accurate to claim that there is no mechanism in the current management regime for the Dolgoi Island Area to share in the burden of conservation for Chignik sockeye. The Department’s emergency order authority provides such a mechanism and was effectively utilized in 2018. In contrast, Proposals 136, 137 and 138 would impose new, unneeded restrictions on the South Peninsula and/or Dolgoi Area fishery in *every year*. In the vast majority of years, when there are no bona fide concerns for Chignik-bound sockeye, those restrictions would simply re-allocate fish to the Chignik Management Area, depriving South Peninsula fisheries of their historical opportunity to harvest a relatively small portion of Chignik-bound fish as well as other stocks intermixed with them.

²² Fox et al., South Alaska Peninsula Salmon Annual Management Report, 2018 and the 2017 Subsistence Fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands Management Areas, ADF&G Regional Information Report No. 4K19-01 (Jan. 2019) (hereafter, 2018 South Peninsula Management Report) at Page 5.

²³ 2017 data are from the Department’s 2017 South Alaska Peninsula Management Report (Fox et al., South Alaska Peninsula Salmon Annual Management Report, 2017 and the 2016 Subsistence Fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands Management Areas, ADF&G Regional Information Report No. 4K18-05 Apr. 2018) at Page 42, Table A14.

²⁴ 2018 data are from the 2018 South Peninsula Management Report at Page 44, Table A14.