

Petition for Finding of Emergency Protection of Chignik Sockeye Salmon due to Historically Low 2018 Escapement and Likely Further Run Failures

The Chignik Advisory Committee urgently requests that the Alaska Board of Fisheries (BOF) and/or the Commissioner of Fish and Game make a finding of emergency and subsequently schedule a time certain to meet and exercise their statutory authority to immediately promulgate new regulations to restrict commercial fishing in the South Peninsula of Area M, namely in the Shumagin Islands area and the South Unimak fisheries in accordance with 5 AAC 96.625 Joint Board Petition Policy and AS 44.62.270.

The current emergency in the Chignik sockeye salmon fishery is an unforeseen, unexpected event that threatens the Chignik sockeye resource – sockeye escapement is significantly less than half of the minimum escapement objectives for first run (Black Lake) sockeye.

Factors in support of finding of emergency:

1. The Chignik drainage supports two sockeye runs, an early run and a late run, which five Native coastal villages depend on economically and culturally. This year the early run which is the Black Lake run has collapsed to where the lower end of the sustainable escapement goal is not going to be achieved. The current (6/26/18) early-run escapement is only 89,022 sockeye salmon, which is 61% below the lower end of the Department's sustainable escapement objective and 73% below the upper goal to date (ADF&G objective: 226,400 – 327,000 through June 26; Wilburn D. 2018, FMR # 18-07).
2. The early run escapement is currently dominated by 2-ocean age fish instead of the usual 3-ocean age fish, and there were many more males than females (2018 Chignik weir report); as such the escapement is of "substandard quality." In 5-years the expected production from such a poor escapement in quality and quantity may well be disastrous for Chignik and other areas that intercept Chignik bound sockeye salmon. Further, the same could well occur in 2019 if the early run fails in overall magnitude to provide a sustainable escapement. The evidence of such is the relative paucity of ocean age-1's and age-2's in the 2018 sockeye escapement to date.
3. Subsistence fishing in Federal waters of the Chignik drainage is currently closed due to an unprecedented low early-run sockeye escapement.
4. There has been no commercial fishery so far this season in the Chignik Management Area (CMA) nor is there any prospect for a fishery on Chignik's early run and fishing on the 2nd run could be delayed during the time when the two runs overlap to save every first run fish possible. Further, given the ADF&G forecast for the late run of 901,000 sockeye salmon, Kodiak's Cape Igvak Section will likely not open nor Area M's Southeastern District Mainland fishery this season. This is because the forecasted harvest on the CMA late run is projected to be less than the required 600,000 fish specified as a minimum harvest level in the CMA to allow interception fishing in the Cape Igvak and SEDM fisheries.
5. At no time since Alaska Statehood has Chignik's early run escapement been so low (pers. com. J. Wadle, ADF&G, Kodiak).

6. The likelihood of a similar Chignik early- run failure next year, 2019, is most probable; the number of 2-ocean and 1-ocean sockeye salmon in the current escapement to date is abnormally low as reported from the Chignik weir. These younger age fish are the primary indicators of next year's run size (pers.com. Dr. Schindler D. FRI).
7. While Kodiak's Cape Igvak and Area M's SEDM fisheries share the burden of conservation of Chignik's two sockeye runs, there is no provision for such in the Shumagin Islands Area or the South Unimak fisheries of Area M during June or July. These fisheries, per the Department's WASSIP study, are known interception areas on east-bound Chignik sockeye salmon. As evident in the following table the South Peninsula of Area M harvested between 44% and 23% of the available Chignik salmon catch in the three WASSIP study years (2006-08). This level of harvest supports the requirement for change in the South Peninsula fishery, namely in the Shumagin Islands Area and South Unimak, to where there is a conservation tie to Chignik's two sockeye runs and at least a minimal sockeye harvest available in the terminal fishery.

Black Lake and Chignik Lake Harvest and Harvest Rates Derived from Appendix F64 of the WASSIP study								
2006			2007			2008		
Black Lake Harvest & Harvest Rates			Black Lake Harvest & Harvest Rates			Black Lake Harvest & Harvest Rates		
Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest
Chignik Area	536,085	55%	Chignik Area	235,768	76%	Chignik Area	254,458	77.3%
South Pen of Area M	444,645	45%	South Pen of Area M	73,004	24%	South Pen of Area M	74,491	22.6%
All Other WASSIP	-	0%	All Other WASSIP	-	0%	All Other WASSIP	175	0.1%
Total	980,730	100%	Total	308,772	100%	Total	329,124	100%
Chignik Lake Harvest & Harvest Rates			Chignik Lake Harvest & Harvest Rates			Chignik Lake Harvest & Harvest Rates		
Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest
Chignik Area	335,201	57%	Chignik Area	510,660	75.8%	Chignik Area	373,841	71.7%
South Pen of Area M	247,568	42%	South Pen of Area M	161,223	23.9%	South Pen of Area M	147,271	28.3%
All Other WASSIP	549	0%	All Other WASSIP	1,712	0.3%	All Other WASSIP	0	0.0%
Total	583,318	100%	Total	673,595	100%	Total	521,112	100%
Total Chignik Harvest & Harvest Rates			Total Chignik Harvest & Harvest Rates			Total Chignik Harvest & Harvest Rates		
Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest	Fishery	Harvest	% of Harvest
Chignik Area	871,286	55.7%	Chignik Area	746,428	76.0%	Chignik Area	628,299	73.9%
South Pen of Area M	692,213	44.3%	South Pen of Area M	234,227	23.8%	South Pen of Area M	221,762	26.1%
All Other WASSIP	549	0.0%	All Other WASSIP	1,712	0.2%	All Other WASSIP	175	0.0%
Total	1,564,048	100%	Total	982,367		Total	850,236	100%

See Appendix A for additional comments on the above table.

8. Chignik is managed as an exclusive terminal stock fishery (5 AAC 15.357). Unlike Kodiak and Area M, Chignik has no alternative salmon fisheries available.
9. The projected 2018 Chignik harvest of non-sockeye salmon is only 581,000 fish, dominated by pink and chum salmon (Wilburn D. 2018, FMR # 18-07).

As previously indicated, urgently needed is regulation requiring the South Peninsula of Area M, namely the Shumagin Islands Area and South Unimak, to reasonably share in the conservation burden for the

Chignik escapement of its two runs to at least support the achievement of minimum escapement goals and increase the chance that a healthy salmon stock would provide a minimum sockeye harvest amount for terminal area fishermen in the Chignik Management Area fishery for 2018 and beyond. In accordance recommended is that from 15 June through July 25 that commercial fishing in the Shumagin Islands Area and South Unimak fisheries, excluding the Unimak District and terminal harvest areas, be closed if Chignik's sockeye salmon escapements are not being met and the Department does not project a minimum of 600,000 sockeye salmon harvest in in the Chignik Management Area fishery. For clarity the 191,000 sockeye salmon cap on the Dolgoi Island Area fishery would still be in effect but also constrained to the degree necessary to accommodate the aforementioned Chignik provisions for escapement and terminal harvest.

The regulatory language offered for this is:

5AAC 09.365 South Unimak and Shumagin Islands June Salmon Management Plan.

(a) amend 2nd sentence to read: The sockeye salmon are predominantly Bristol Bay and Chignik origin.

(d) In the South Unimak and Shumagins islands fisheries, the commissioner may establish by emergency order, commercial fishing periods as follows:

(1) for set gillnet gear,

(B) rewrite to read: notwithstanding (A) of this paragraph: Beginning June 15 and continuing through June 30 the commercial fishery in the Shumagin Islands Area and South Unimak excluding the Unimak District and terminal harvest areas, commercial fishing may be conducted provided Chignik's early run escapement goal is being met and the Department projects a harvest of at least 300,000 sockeye salmon in the Chignik Management Area described in 5 AAC 15.100.

(2) for seine and drift gillnet gear,

(B) rewrite to read: notwithstanding (A) of this paragraph: Beginning June 15 and continuing through June 30 commercial fishing in the Shumagin Islands Area and South Unimak excluding the Unimak District and terminal harvest areas, commercial fishing may be conducted provided Chignik's early run escapement goal is being met and the Department projects a harvest of at least 300,000 sockeye salmon in the Chignik Management Area described in 5 AAC 15.100.

5AAC 09.366 Post-June Salmon Management Plan for the South Alaska Peninsula.

(a) amend to read: The purpose of this management plan is to provide management guidelines to the department for management of the post June salmon fisheries along the South Alaska Peninsula, to provide for the harvest of local stocks in terminal harvest areas, and in July manage fishing opportunity on Chignik-bound sockeye salmon in waters outside of terminal harvest areas.

(d) amend to add (3): notwithstanding (b) and (c)(1), from July 1 through July 25 commercial fishing in the Shumagin Islands and South Unimak Areas, excluding the Unimak District and terminal harvest areas, may be conducted provided Chignik's escapement goals are being met and the Department projects a total harvest of at least 600,000 sockeye salmon in the Chignik Management Area described in 5 AAC 15.100.



Jacob Shangin, Chignik Advisory Committee Chairman

July 1, 2018
Date

Appendix A

Additional comments on the WASSIP table in Point #7 on Page 2

The South Peninsula (S. Pen.) of Area M harvests a significant proportion of Chignik bound sockeye even on poor years when the Southeast District Mainland (SEDM) is closed. The tables on Page 2 in point #7 are derived from the Western Alaska Salmon Stock Identification Program (WASSIP), especially Appendix F64 of the Harvest and Harvest Rates of Sockeye Salmon Stocks paper (ADF&G Special Publication No. 12-24), and they shed light on the impact of South Peninsula Fisheries on Black Lake and Chignik Lake sockeye stocks. These insights support the traditional knowledge of Chignik area fishermen regarding substantial harvests of Chignik bound stocks in areas of the S. Pen. well outside of the SEDM. It is scientifically sound and reasonable to assume that one can make justifiable inferences for current and future fisheries from WASSIP data. However, it should be noted that all three of the WASSIP years, 2006 - 2008, were weak Chignik sockeye years, so likely the Area M/S. Pen. harvest rates are higher on most years.

It should also be noted that the WASSIP only covers from Norton Sound through Chignik and does not cover Kodiak. It is well understood that Chignik bound sockeye are harvested in Kodiak waters, certainly at Cape Igvak, which has an allocation plan based on Chignik sockeye, but also in other locations in the Kodiak management area. Thus one should be careful to keep in mind that when we speak of "total" Chignik sockeye harvests, we are talking about the total Chignik sockeye harvest accounted for in the WASSIP. To put in more bluntly, Chignik fishermen harvest less Chignik bound sockeye in their terminal area than the WASSIP accounts for.

In 2006, the only year out of the three in which the Chignik sockeye return was strong enough to support a SEDM fishery under the SEDM management plan, the S. Pen. of Area M harvested 45% of the total WASSIP harvest of Black Lake sockeye and 42% of Chignik Lake Sockeye while Chignik fishermen harvested 55% Black Lake sockeye and 57% of the Chignik Lake sockeye in their terminal area fishery.

In 2007 and 2008 the sockeye returns to Chignik were so poor (total harvests of 628,299 in 2008 and 746,428 in 2007 compared to the long term average harvest of about 1.5 million) that the interception fishery in SEDM was closed down. However, all the fishing vessels that couldn't fish SEDM likely went and fished elsewhere in the Area M. Despite SEDM being closed, the S. Pen of Area M still harvested between 22.6 and 28.3% of Chignik's Black Lake and/or Chignik Lakes sockeye harvest accounted for in the WASSIP study.

Although we don't have an example of a strong Chignik sockeye season we can see that even in poor years the South Peninsula of Area M has a high impact on Chignik bound sockeye stocks.