

My name is Anna Crary and I represent the Chignik Intertribal Coalition and the Chignik Regional Aquaculture Association which advocate for Chignik's residents. I support Proposals 58 through 62.

As the harvester closest to Chignik's terminal streams, Chignik bears a heavy conservation burden to ensure that Chignik stocks meet escapement. The Board should recognize and alleviate this burden by shifting the Igvak allocation to Chignik. The allocation factors – in particular factors 4 and 6 – favor this shift.

The Chignik region lacks alternative fisheries resources. Chignik has access to two terminal stocks – the early and late sockeye run. Yet even when the Igvak fishery is closed, Kodiak's commercial salmon harvests continue to prosper because Kodiak has access to 60 salmon runs and two hatcheries within the KMA.¹

The importance of the Chignik sockeye fishery to the Chignik economy also supports this shift. Borough and municipal tax revenue is overwhelmingly dependent upon raw fish and landing taxes.² Without those tax resources, cities can't survive.

Comparison of Kodiak and Chignik harvests demonstrates that the economic and conservation benefits that will incur to Chignik by shifting the Igvak allocation far outweigh any economic harm to Kodiak. In 2017, only 5.3% of Kodiak's total sockeye harvest of 2,467,246 fish came from Igvak. By comparison, that same number of fish – 131,223 sockeye – was 14.6% of Chignik's total sockeye harvest of 897,489 fish.³

Management plans should not be based on inaccurate projections and assumptions. For the past 40 years, the Igvak plan has remained largely unchanged while dollar values, fish values, and the health of Chignik's two sockeye runs have changed.

Igvak's economic guarantees for Chignik are obsolete relative to today's dollar and sockeye values. In 1978, the Board thought that guaranteeing Chignik a minimum harvest of 600,000 sockeye would provide a sufficiently strong economic basis for the community.⁴ Today, while \$1 is worth one-third its value in 1978,⁵ the Igvak plan's minimal harvest thresholds remain as they were in 1978. In 1978, at an estimated price of \$1.26 per lb, the harvest of 300,000 sockeye weighing an average of 7.9 lbs would generate \$2.9 million.⁶ But today, a harvest of 1.1 million Chignik sockeye would be required to generate the same value for Chignik.⁷

¹ 2019 Kodiak AMR.

² See RC 37.

³ Total 2017 Kodiak salmon harvest was 29,978,228. Total 2017 Chignik salmon harvest was 8,815,424 fish.

⁴ See RC 39.

⁵ See RC 42.

⁶ *Id.*

⁷ *Id.*

Salmon fisheries need to be managed to allow escapements within ranges necessary to conserve and sustain potential salmon production and maintain normal ecosystem functioning.⁸ For the past two years, Chignik's early run has not made its escapement goals. Despite projections of healthy harvestable surpluses, in 2018 and 2019 Chignik saw two of the worst harvest years on record. Shifting the Igvak allocation to Chignik will help rehabilitate the depressed economies of Chignik's communities and strengthen the escapements and yields of Chignik's early and late run sockeye stocks.

2018 and 2019 escapement and harvest data and projected escapement and harvest data for 2020 clearly demonstrates a pattern of a depressed return of early and late run sockeye stocks. The continued aggressive interception of these stocks in Cape Igvak threatens the existence of Chignik's communities and the sustained yield of Chignik sockeye stocks.

⁸ 5 AAC 39.222(c)(2).