



IN REPLY REFER TO:

United States Department of the Interior

Office of Subsistence Management
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Anchorage, Alaska 99503-6199

OSM 19000.GP

FEB 20 2019

Mr. Reed Morisky, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Morisky:

The Alaska Board of Fisheries will deliberate 33 proposals, among other issues, at its Alaska Peninsula, Aleutian Island, and Chignik Areas Finfish meeting beginning February 21, 2019. We have reviewed the proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed the enclosed preliminary recommendations for two proposals that have potential impacts on Federal subsistence users and fishery resources in this area.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Thomas Doolittle
Acting Assistant Regional Director

Enclosure

cc: Federal Subsistence Board

Orville Lind, Acting Deputy Assistant Regional Director Office of Subsistence Management

Jennifer Hardin, PhD, Subsistence Policy Coordinator, Office of Subsistence Management

George Pappas, State Subsistence Liaison, Office of Subsistence Management

Carl Johnson, Supervisory Program Analyst, Office of Subsistence Management

Gregory Risdahl, Fisheries Division Supervisor, Office of Subsistence Management

Pippa Kenner, Acting Anthropology Division Supervisor Office of Subsistence Management.

Glenn Haight, Executive Director, Alaska Board of Fisheries

Mark Burch, Special Project Coordinator, Alaska Department of Fish and Game

Interagency Staff Committee

Administrative Record

**Alaska Board of Fisheries
February 21-27, 2019 Anchorage, Alaska
Chignik Area Proposals**

Federal Comments

The following comments address these proposals only as they affect Federally qualified subsistence users and resource conservation.

PROPOSAL 147 seeks to reduce the August and September Sockeye Salmon inriver escapement goals above the Chignik River weir. The proponent requests reductions from the current inriver escapement goal of 75,000 Sockeye Salmon, which is defined in State regulation as a combination of at least 25,000 fish in August and 50,000 fish for the month of September, to a total of 20,000 fish, comprised of 10,000 fish in August and 10,000 fish in September.

Existing and proposed Chignik River late-run Sockeye Salmon escapement goals (in thousands)

Existing Goals

Sustainable Escapement Goal	Inriver Goal August	Inriver Goal September	Total Escapement Goal
200-400	25	50	275-475

Proposed Goals

Sustainable Escapement Goal	Inriver Goal August	Inriver Goal September	Total Escapement Goal
200-400	10	10	220-420

Existing Federal Regulations:

50 CFR 100.27 (e)(8) Chignik Area.

(i) You may take fish other than salmon, rainbow/steelhead trout, or char at any time, except as may be specified by a subsistence fishing permit. For salmon, Federal subsistence fishing openings, closings and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action. Within the Chignik Area, depending upon the area that you may fish, in addition to a State subsistence fishing permit, you may be required to also have a Federal subsistence permit.

Is a similar issue being addressed by the Federal Subsistence Board? No. Currently, there are no related fisheries proposals being addressed by the Federal Subsistence Board. The Federal Subsistence Board will meet to deliberate proposals to change Federal subsistence fishing regulations April 15-18, 2019.

Impact to Federal subsistence users/fisheries: Yes. The adoption of this proposal could result in potential loss of subsistence harvest opportunity for Federally qualified subsistence users to target 55,000 late-run Sockeye Salmon migrating into the Chignik River watershed above the weir beginning in August through mid-winter (the fresh water lifespan of very late arriving salmon). This reduction of late season

escapement could result in loss of opportunity for Federally qualified subsistence fishermen to harvest “redfish” during the fall through mid-winter months.

During the month of September, little, if any, commercial exploitation is focused on the latest arriving portion of the Sockeye Salmon return to the Chignik River watershed. As such, fisheries managers have limited tools to increase escapement into the system because the Sockeye Salmon commercial fishery processors have normally ceased operations for the season.

Federal Position/Recommended Action: The Office of Subsistence Management opposes this proposal. The Board of Fisheries passed a modified Proposal 172 during its February 2016 meeting that increased the August and September inriver Sockeye Salmon goal-specifically to increase late season subsistence fishing opportunity. The Office of Subsistence Management supported modifying Proposal 172 to increase the existing August escapement schedule through the addition of 25,000 Sockeye Salmon. Adoption of this proposal, especially in light of the poor return in 2018, is not recommended at this time. Adoption of this proposal could exacerbate hardships that Federally qualified subsistence users have recently endured.

PROPOSAL 154 seeks to change the Chignik River Chinook Salmon escapement goal from the current goal of 1,350-2,700 fish to a “mature” fish only goal.

Existing State Regulations

5 AAC 15.357. Chignik Area Salmon Management Plan.

(a) The department shall manage the commercial salmon fishery in the Chignik Area in accordance with the guidelines set out in the management plan under this section. The goal of this management plan is to allow traditional fisheries in the area to be conducted on Chignik Area salmon stocks, and to achieve the department's biological escapement goals for both Black Lake (early-run) and Chignik Lake (late-run) sockeye salmon and local stocks of pink, chum, coho, and king salmon.

Existing Federal Regulations

50 CFR 100.27 (e)(8) Chignik Area.

(i) You may take fish other than salmon, rainbow/steelhead trout, or char at any time, except as may be specified by a subsistence fishing permit. For salmon, Federal subsistence fishing openings, closings and fishing methods are the same as those issued for the subsistence taking of fish under Alaska Statutes (AS 16.05.060), unless superseded by a Federal Special Action. Within the Chignik Area, depending upon the area that you may fish, in addition to a State subsistence fishing permit, you may be required to also have a Federal subsistence permit.

Is a similar issue being addressed by the Federal Subsistence Board? No. Currently, there are no related fisheries proposals being addressed by the Federal Subsistence Board. The Federal Subsistence Board will meet to deliberate proposals to change Federal subsistence fishing regulations on April 15-18, 2019.

Impact to Federal subsistence users/fisheries: Potentially. It is difficult to determine the impacts of a newly devised escapement goal. If Proposal 154 is adopted, the new Chignik River mature Chinook Salmon escapement goal would be based on an estimate of fish passing through the weir determined by

length. Depending upon what the final goal for mature fish size and range in total numbers of fish adoption of this proposal may result in unnecessary restrictions to Federally qualified subsistence users targeting Chignik River Chinook Salmon.

Federal Position/Recommended Action: The Office of Subsistence Management **opposes** this proposal as written because the proponent specifies the intent of the proposal is to increase large Chinook Salmon escapement into the Chignik River watershed without biological justification. Although the proponent expresses concerns with the percentage of “jack kings” present in recent escapements, all age classes contribute to the reproductive potential of the population.

If this proposal is adopted and a mature fish escapement goal is developed that reflects the current all fish escapement goal, the Office of Subsistence Management’s position would become **neutral**. New technology, escapement estimation tools, and population models are continuously developed and introduced by resource management teams. Transitioning from one goal to a newer improved format after extensive research is an acceptable and sound practice.