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July 8, 2018

Alaska Board of Fisheries
Alaska Department of Fish & Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526,
dfg.bof.comments@alaska.gov

Sent Via Electronic Mail

Dear Members of the Alaska Board of Fisheries,

Afognak Native Corporation (hereafter "Afognak") is an Alaska Native Village Corporation formed under the Alaska Native Claims Settlement Act of 1971. Afognak has 1,116 Native Shareholders, who are descended specifically from the Village of Afognak, on Afognak Island, in the northern part of the Kodiak Island Archipelago. On March 7, 1964, one of the largest natural disasters in U.S. history, the "Good Friday" earthquake and tsunami, destroyed our traditional home on Afognak. Following the destruction of our village, many chose to relocate and build a new village on Kodiak Island. Our new village was named Port Lions after the philanthropic "Kodiak Island Lions Club," that helped rebuild our community.

Afognak Native Corporation was organized in 1977 through the merger of two ANCSA village corporations: Port Lions Native Corporation and Natives of Afognak, Inc. Shareholders of Afognak Native Corporation include those who live in the Native Village of Port Lions and elsewhere on Kodiak Island. Many of our Shareholders and their families operate fishing businesses and otherwise rely on fisheries for their livelihood and cultural subsistence.

We are writing with regard to the two emergency petitions filed by the BBNA Executive Committee and the Chignik Advisory Committee requesting that the Alaska Board of Fisheries and/or the Commissioner of Fish and Game issue a regulation to restrict commercial fishing or reduce Area M and the Kodiak Fishery. The proposed regulatory changes are problematic in relation to the science presented and to the potential devastating impacts on the fishing of local stocks. In addition, the proposed changes do not address the natural variability (big or small) of sockeye or pink runs in the region (consider Karluk in 2017). Accepting the proposal will set a terrible precedent to completely disrupt one area's fishery to theoretically advantage another area's harvest. With the current proposal, Kodiak fisheries are singled-out. Salmon are considered "common property" and do not "belong to" the management area where they were born.

Afognak opposes any request from other fishery management areas to stop or reduce salmon fisheries within the Kodiak Management Area. While we sympathize with the families and businesses in Chignik that are experiencing the impacts of such low runs, we ask the Board of Fisheries to acknowledge that instituting



a regulation that will restrict or shut down Kodiak fisheries this year will not alleviate Chignik's low runs. Kodiak fishermen are fishing local waters and targeting Kodiak river system fish in 2018, as the Cape Igvak section of the Kodiak Management Area has not been opened due to conservation concerns with the Chignik return.

In addition, the 2018 Kodiak sockeye harvest is below historic averages and the two river systems, Litnik and Buskin, that are critical to subsistence harvest for residents of Kodiak, Ouzinkie, and Port Lions, have been closed to subsistence harvest due to low returns of sockeye. Given the sockeye run failure in Chignik, Kodiak, and in the Prince William Sound, we would encourage the Board of Fisheries to address this as an area wide issue related to larger oceanographic conditions such as the unusually warm ocean water temperatures in 2015 and 2016 rather than a unique failure of one particular fishery.

Finally, the proposal does not take into account the economic costs to Kodiak salmon fishermen, processors, processing workers, Kodiak businesses, and the Kodiak community. The Kodiak fishery is an historical fishery that is not fishing new areas, or seeing increased targeting of Area M or Chignik fish. Approving proposed regulations would place an inappropriate and egregious burden on Kodiak fishermen, their families, the Kodiak fishing industry, and the many communities that rely on it for their livelihoods.

We ask the Board of Fisheries to consider the burdens facing all fisheries with the low runs, as well as the variability from year-to-year that fixed regulations are unable to take into account. Therefore, Afognak supports the effort to issue an economic disaster declaration for Chignik, however, Afognak does not support restricting or closing the salmon fishery in the Kodiak Management Area due to the poor sockeye returns to Chignik in 2018.

Quyanaa. Thank you for your time and leadership,

Kristy Clement
Chair, Board of Directors
Afognak Native Corporation



Al L Anderson
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07/09/2018

Alaska Board of Fisheries
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Mr. Chairman and Board Members,

The time has come where you must put aside the percentages, boundaries and all the other regulatory language that you have come up with.

The Chignik Sockeye System is in failure mode. Both Black Lake and Chignik Lake are not making their minimum escapement goals. Subsistence use is not being met. Subsistence people have voluntarily stood down to help meet the escapement goals.

Subsistence has been closed down in river from Chignik Island upstream and yet AREA "M" is allowed to continue to fish on Chignik bound stocks, this has to STOP NOW!!

Al L. Anderson

A handwritten signature in cursive script that reads "Al L. Anderson".



July 9, 2018

Board of Fisheries,

As of July 7th we are still at a historical low for our escapement which I am sure you are aware:

Escapement 174,565

Fisheries took place this past weekend and Alaska Department of Fish and Game are aware of the total amount caught and delivered. Many of the fishing boats didn't caught enough to deliver. There were 11 boats were my son was fishing and after he made a set and only caught 2 fish (obviously not enough for a delivery) the other skippers decided it was best to save fuel. My son made 3 additional hauls for 0 fish in each of those hauls.

It is evident that fish are not making their way back to Chignik management area.

State of Alaska paid millions of dollars to do the WASSIP Study. So why is the Board of Fisheries not taking the study to heart and implementing a conservation plan based on the study report which concluded that 37% -67% (in the 3-year study) of the Chignik Sockeye salmon comes from the Dolgoi area.

Simple solution: Shut down the Dolgoi area and there is still plenty of Alaska Peninsula Management Area to fish for their fisherman.

Chignik's 1st run is a disaster and not enough was done to protect it.

Chignik can't afford to lose the 2nd run also.

There could be other circumstance that could be affecting the return of sockeye to the management area that are beyond our control, however, the first and easiest method once again is to stop intercepting fisheries that is going on in Alaska Peninsula Management Area. This intercepting fishery also affects Kodiak and Cook Inlet.

Chignik Fisherman are in the trust that the State of Alaska will take the commitment for the protection and the conservation of the Chignik Bound sockeye salmon.

Alana Anderson

Year-round resident of Chignik Bay



With Spirit and Strength

July 6, 2018

RE: Board of Fisheries Emergency Meeting concerning Area M petitioned closures

To Whom It May Concern;

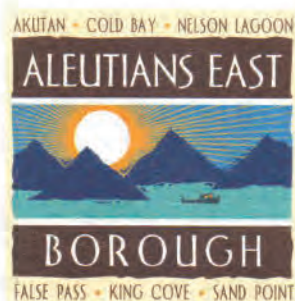
The Aleutian Pribilof Islands Association, Inc. is the regional non-profit serving the 13 Aleut Tribes. APIA provides a wide variety of services to benefit our people, including health, public safety, cultural heritage and economic development. Fisheries are the primary economic driver in the regional and have sustained the Aleut culture over the millennia. After reviewing the petitions from BBNA and the Chignik Advisory Committee, APIA's Fisheries Committee asks that the Fisheries Board deny these emergency petitions to restrict South Peninsula salmon fishing at this time for these following numerous reasons.

Chignik and Area M proposals are already scheduled to be discussed during this Board of Fisheries meeting cycle at the February 2019 meeting. ADFG already has emergency order authority to make adjustments as needed to the South Peninsula fishery, and have already exercised that authority this June when they reduced our June fishing time by 25%. In July fishing is closed nearly twice as much as it is open, in the current management plan. An all-out closure of the South Peninsula fishery will not significantly help improve the Chignik run, but it will do lasting damage to South Peninsula fishermen, processors, communities and this historic salmon fishery. Unfortunately, low salmon runs are occurring throughout the Gulf of Alaska this year, likely caused by environmental conditions, and not South Peninsula fishermen. An additional concern is the lack of data that shows that South Peninsula closures will improve Chignik fisheries or not result in the potential over escapement in other areas.

Thank you for your consideration and please direct any questions or response to Community Environment & Safety Manager Karen Pletnikoff at (907)276-2700 or karenp@api.ai.org.

Sincerely,

Dimitri Philemonof, President/CEO



July 9, 2018

Alaska Board of Fisheries
John Jensen, Chair
Via email dfg.bof.comments@alaska.gov

RE: Emergency Petitions on Chignik Sockeye Fishery

Chairman Jensen and Board Members:

Thank you for the opportunity to comment on two emergency petitions before the Alaska Board of Fisheries (board) on July 17. Both petitions seek to address a very weak early run of sockeye to the Chignik River through emergency action to further regulate or restrict fisheries in the South Peninsula of Area M. The Aleutians East Borough (AEB) is strongly opposed to both petitions and requests that the board deny them.

While we understand concern for recent low return of the early Chignik sockeye run, there is no evidence that this circumstance is tied to either the June or Post-June South Peninsula (or any other) fisheries. The fisheries have operated for decades under detailed management plans developed through public process and adopted by the board. Under these plans, with the exception of this year's early run, Chignik has never failed to achieve its targeted escapement goal since 2008 (Munro and Volk, 2017, ADFG, FMS 17-05). Escapement is the currency of salmon conservation.

It is important to recognize that ADFG has Emergency Order authority to address any in-season conservation concerns and has shown willingness to exercise that authority in recent, unprecedented actions which dramatically reduced fishing time for the final two periods of the June fishery. The 25% reduction in June fishing time as a result of these measures has had significant, negative impacts on fishermen and communities of AEB. While ADFG took this action as a conservation measure, harvest rate data from WASSIP studies, 2006-2008, shows that very few early run Chignik fish were likely conserved by this action in late June (letter to Commissioner Cotten from AEB, July, 2018). We believe that these emergency actions should carefully weigh possible conservation benefits, as evidenced by available data, against economic and social impacts.

In general, for June fishery, WASSIP data shows that with the exception of Dolgoi in 2006, harvest rates on early run Chignik fish, the appropriate measure for evaluating impact of a fishery on any specific run, are typically less than five percent (ADFG special publication 12-24, app F 64-66). Similarly, in Post-June fisheries, aside from the Dolgoi area, impacts to early run Chignik fish are less than two percent. Impacts to the late Chignik sockeye run are somewhat greater in Post-June fisheries, however, recent weir



counts for this run component as of July 7 are larger for this date than 3 of the previous nine years and more than twice as large as those counts in 2013 and 2015 (ADFG, in-season Chignik weir counts). The 2018 June fishery is over and there is no emergency to be addressed in the post-June fishery; the Chignik late run of sockeye appears to be on track.

The emergency petition from the Chignik AC seeks to specifically modify management plans for South Peninsula fisheries of Area M to conserve Chignik runs. However, the use of stock proportions to detail numbers of Chignik bound fish harvested in South Peninsula fisheries, as is presented in the petition, speaks to allocation, not conservation. Allocation is the province of the board and should be taken up at regular public meetings along with the management plans that direct fisheries in support of those board determined allocations.

In summary, AEB strongly urges the board to reject these emergency petitions because there is no action that would reasonably address the poor early run sockeye to Chignik River, ADFG has emergency order authority to address any in-season conservation issues, and management plans are already scheduled to be addressed in February, 2019 through the normal public process.

Thank you for your public service to the State of Alaska.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alvin D. Osterback".

Alvin D. Osterback, Mayor



Response of Area M Seiners Association to Emergency Petitions on Chignik Sockeye
July 9, 2018

The Area M Seiners Association submits this response to the Emergency Petitions of the Bristol Bay Native Association and the Chignik Advisory Committee. The former requests emergency regulations to stop or reduce Area M and Kodiak Fishery interception of Chignik sockeye salmon while the latter seeks radical revisions in the South Unimak and Shumagin Islands June Salmon Management Plan (5 AAC 09.365) and the Post-June Salmon Management Plan for the South Alaska Peninsula (5 AAC 09.366), also to protect the Chignik run.

In response to unanticipated weakness in the early run of sockeye in the Chignik River, the Petitions ask the Board of Fisheries to re-write the June and Post-June Management Plans on an emergency basis. However, the Alaska Department of Fish and Game has already acted to restrict the South Unimak and Shumagin Island June Fishery in response to the weakness of the early Chignik run, curtailing the third and fourth openings by more than 50 percent (from 88 to 40 hours each). And, because the June Fishery has already ended, no further action can be taken by the Board with respect to the June Fishery that would address the weakness of the early Chignik run this year.

Based on the best available science, the harvest rate in the Post June Fishery on the early run of sockeye in the Chignik River is very small, typically on the order of 1 or 2 percent. Because the Post June Fishery is already heavily restricted under the Board's Post June management plan, there is no need for further restrictions to protect the early run of sockeye into the Chignik River. *See* 5 AAC 09.366 (Post-June Salmon Management Plan for the South Alaska Peninsula). It should also be noted that, under the Southeastern District Mainland Salmon Management Plan, 5 AAC 09.360, the Southeast District Mainland Fishery will be closed at least until July 25 this year to protect Chignik sockeye.



Furthermore, while the early run is weak, recent weir counts have shown some improvement in the run size. This is not to minimize the weakness of the early run this year, but to note that fears of a total run failure or the lowest escapement ever have not been realized.

With respect to the late run of Chignik sockeye, the evidence to date also does not indicate there will be a run failure. The most recent cumulative count of late run sockeye at the Chignik weir is higher than cumulative count on the same day in 2015 and 2013 and is about 61% of the average count on the same day from 2009 through 2017. Moreover, as noted, the Department of Fish and Game took emergency action to restrict the June Fishery in response to the weakness of the early run. The Department is closely monitoring the late run and can take emergency action as necessary and appropriate in the event an emergency does arise with respect to the late run. Accordingly, there is no emergency with respect to the late run of Chignik sockeye within the meaning of 5 AAC 96.625(f) that requires *Board* action outside of the Board's normal meeting process.

The June and Post June Fisheries will be before the Board at its February 2019 meeting as part of the normal Board process, before next year's fishing season. Under these circumstances, there is no need and it would be highly inappropriate for the Board to consider drastic revisions to the management plan on an emergency basis outside of the normal process. *See* 5 AAC 96.625(e).

In considering whether to take emergency action – and, if so, what emergency action to take – the Area M Seiners Association urges the Board and the Department to consider the following factors:

1. There is no evidence that any Area M fishery is the cause of the unexpected weakness in the early sockeye run in the Chignik River in 2018. The weakness of that run took place in the context of low returns in multiple runs throughout the Gulf of Alaska. Given the widespread nature



of the problem, it is highly unlikely that it was caused by an Area M (or any other) fishery or management plan. At least initially, it appears that the cause may be tied to unusually warm water conditions in the Gulf beginning in 2014. See

<https://www.undercurrentnews.com/2018/06/27/the-blob-likely-to-blame-for-poor-salmon-returns-in-gulf-of-alaska/>.

It is also possible that changes in the marine environment in the Chignik region may be at play. See <https://www.fisheries.noaa.gov/feature-story/volcanoes-and-eelgrass-transform-salmon-habitat>.

2. No further action can be taken in the South Unimak and Shumagin Islands June Fishery to address the problem with the early Chignik run this year because the June Fishery is over. Any decision to revise the June Management Plan because of this year's weak returns should therefore be made following full review at the Board's February 2019 meeting, at which causes and potential solutions can be considered with full public participation. As stated in the Joint Board Petition Policy:

The Boards of Fisheries and Game recognize the importance of public participation in developing management regulations, and recognize that public reliance on the predictability of the normal board process is a critical element in regulatory changes. The board find that petitions can detrimentally circumvent this process and that an adequate and more reasonable opportunity for public participation is provided by regularly scheduled meetings.

5 AAC 96.625(e).

3. The Petition does not establish the existence of an emergency with respect to the late run of Chignik sockeye. The following table sets forth the cumulative escapement of late run sockeye through July 8 as posted on-line by the Department (http://www.adfg.alaska.gov/static/fishing/PDFs/commercial/westwardsalmon/akpeninsula_salm_on_escapement.pdf):



Chignik River Late Run Sockeye Cumulative Escapement through 7-8-2018	
2018	14,013
2017	25,085
2016	32,188
2015	7,345
2014	51,127
2013	9,369
2012	19,518
2011	2,1702
2010	19,425
2009	21,457

Thus, as of July 8, the cumulative 2018 late run escapement was higher than it was in 2015 and 2013 on the same day, and about 61% of the average cumulative escapement on July 8 from 2009 through 2017 (22,984). These data do not provide evidence of a run failure or of an emergency within the meaning of 5 AAC 96.625(f) (“an unforeseen, unexpected event that ... threatens a fish or game resource”). If they did, the Board could be called upon to take emergency action in almost any circumstance in which early escapement counts were below average.

4. Moreover, the Department is closely monitoring the late run returns and has emergency order authority to take action in the Post-June Fishery if necessary to address new information creating an emergency. The Department has shown its willingness to exercise that authority in the



June Fishery. Accordingly, there is no need for the Board to take emergency in-season action with respect to the Post-June Fishery.

5. If it becomes necessary to take emergency action in the Post-June Fishery, the Department should consider both the conservation benefits to be obtained from such restrictions and the costs to the participants in the fishery. The following table shows the mean harvest rates on the Black Lake and Chignik Lake sub-regional reporting groups in the Post-June Fishery by area stratum in 2006, 2007 and 2008 from Appendices F64-F69 of the WASSIP harvest rate report (No. 12-24):

Harvest Rates in the Post-June South Peninsula Fishery on Black Lake and Chignik Lake Sub-Regional Reporting Groups by Area Stratum and Year						
	Black Lake			Chignik Lake		
Area Stratum	2006	2007	2008	2006	2007	2008
Shumagin Islands	1.6%	1.4%	1.0%	6.7%	2.5%	6.6%
Dolgoi Island	6.4%	2.4%	0.4%	8.2%	7.2%	2.8%
Ikatan	0.0%	0.1%	0.0%	0.1%	0.2%	0.2%

These data show there are very few savings to be obtained for early Chignik run (represented by the Black Lake sub-regional reporting area) from restrictions in the Post-June Fishery, with the possible exception of restrictions in the Dolgoi area in some years. Somewhat greater savings might be obtained for the late Chignik run (represented by the Chignik Lake sub-regional reporting area) from the Shumagin Islands and Dolgoi areas in some years, but not from the Ikatan area.



Restrictions should not be imposed in any area that cannot reasonably be expected to yield material conservation benefits for either the Black Lake or Chignik Lake reporting areas.

6. Because the South Peninsula Post-June Fishery is a mixed-stock fishery, any restrictions on the fishery that are designed to reduce impacts on Chignik sockeye will result in lost harvest of other, healthier stocks. According to the data in Appendices E1-10 of the WASSIP stock composition report (No. 12-22), in almost all areas, years and date strata, the large majority of the sockeye harvests in the Post June Fishery is *not* from Black Lake or Chignik Lake, but from other regions (including Area M).

7. The emergency restrictions that the Department imposed in the June Fishery this year contributed to the lowest harvests in the past eleven years, with significant resulting losses of income to the fishermen and the communities. The June 2018 sockeye harvest was only 68% of the average harvest from 2008 to 2017. Further restrictions in the Post June Fishery should not be imposed in the absence of a demonstrated conservation emergency and compelling evidence that restrictions in the Post June Fishery will have a material benefit in addressing that emergency. Because the evidence does not demonstrate that either criterion is present, and because the Department can take emergency action if circumstances change, there is no basis for emergency Board action.



7-9-2018

Greetings Board of Fish

With regard to the Chignik River Sockeye run: local residents and area fisherman are desperate for consideration from the Board of Fish and the department of Fish and Game. Despite the horrifically low escapement numbers in the Chignik river and other areas, the area M intercept fishery in the Shumagin Islands and Dolgoi Island is continuing without any conservation tie to the salmon systems it is threatening. It seems completely unrealistic and short sided to allow a fishery of the scale that is in place in area M to fish without checks and balances. Studies have shown that the area M intercept fishery intercepts significant percentages of other area's salmon runs.

In June during a salmon meeting the head biologist for chignik made it clear that if local fishermen catch our own local sockeye stocks during inner bay fishing periods we will be severally curtailed or completely shut down! During these periods area M fisherman are still free to target chignik sockeye on the capes in significant numbers while the chignik river is below its escapement objective. When that happens the chignik fisherman become the conservation effort for area M's harvest of chignik stocks. I believe this to be a severe issue and it hints at department of Fish and Game bias against chignik fisherman.

As a lifelong chignik fisherman I plead with the you to place a conservation tie on the area M intercept fishery to protect the chignik sockeye resource for the future.

Sincerely,

Axel Rowland



6-19-2018

Axel Rowland

To Whom it may concern

Chignik Sockeye Concerns

There is a serious dilemma occurring in the Chignik area concerning the Chignik sockeye salmon run. The run has failed to the point that Chignik fisherman, locals, and natives have voted, during the 6-18-2018 Chignik sockeye concerns meeting, to self-suspend their subsistence fishing rights until the sockeye escapement is met to help protect our resource. The run escapement currently stands at less than one tenth of the ten-year average by date. Despite this the Shumagin Islands/Dolgoi Islands Area M intercept fishery remains fishing relatively un-checked. The Department of Fish and Game has cut the fishing time in those areas in half starting with the June-20th and June-22nd openings due to significant Chignik sockeye traveling in those areas during June. While this step will help somewhat, it is too little too late. I would bring to your attention a 2004 Board of Fish ruling which resulted in the Historical fishing pattern changing from 75% effort in South Unimak and 25% effort in the Shumagin Islands/Dolgoi Islands to 25% effort in South Unimak and 75% effort in the Shumagin Islands/Dolgoi Islands. It is important to note that the South Unimak Area fishery historically intercepts only 4% of Chignik river sockeye whereas the Shumagin Islands/Dolgoi Islands fishery historically intercepts 18% to 20% Chignik fish in June as proven by a recent WASSIP study based on genetic sampling. Despite this there is no conservation tie to the Chignik sockeye run. The Chignik area fisherman and CRAA, (Chignik Regional Aquaculture Association), have warned the Board of fish since the 2004 ruling that the unbridled Intercept fishery would result in the failure of our run. Little has been done. The Chignik area has fought for a conservation tie to be placed on the Shumagin Islands/Dolgoi Islands fishing area to help protect the Chignik sockeye run to prevent total failure not unlike what has occurred this year. Let it also be noted that the Shumagin Islands/Dolgoi Islands fishery intercepts 50% Chignik sockeye in July based on the recent WASSIP study and that those high numbers were recorded during low return Chignik years. It



is very reasonable to think that the Chignik sockeye intercept percentage could be as high as 75% or more during average Chignik sockeye returns.

I am a lifelong Alaska resident and lifelong fisherman. My family Commercial fished before me. I look forward to sustainably harvesting fish for the rest of my life. I operate the F/V Sea Spray out of Chignik Alaska and Pyramid Peak LLC. Out of Unalaska, AK. I am deeply concerned for the Chignik Sockeye run.

Alyce Paulson

P.O. Box 393

Unalaska, AK 99685



Chignik Sockeye concerns list

name	occupation
Axel Rowland	Permit holder / Boat owner
Roger Rowland	Permit / Boat FV COMMITMENT
Eugene Calhoun fisherman 1968	Permit Boat owner / FV Meg Kenev
Bernard Carlson	" " " "
Jim W. Bostrom	Lisa Anne Permit holder Boat owner fish chignik since 1979
Rachel Allen	boat owner / seinerin Chignik
Sean Alexander	skipper FV Mary Jane 4th Gen Fisherman
Ben Allen	Permit Holder / Captain
Frank Koshewatz for	Permit Holder / captain
Amelia Mikkelsen	lifelong fisherman
David Quoyle	fisherman
John Kopar	Permit holder / boat owner / subsistence user
Dale Carlson	Permit holder / TAJAH



Belkofski Tribal Council
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kcbtc@arctic.net

July 9, 2018

Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
1255 W. 8th Street
Juneau, Alaska 99811-5526

To Alaska Board of Fisheries,

The two recent emergency petitions submitted by BBNA and the Chignik Advisory Committee seeking to further restrict or close the South Peninsula salmon fisheries should be denied at this time because:

- The February 2019 Board of Fisheries meeting cycle already has Chignik and Area M proposal scheduled to be discussed.
- ADFG has previously exercised its authority this June by reducing our June fishing time by 25%, and in July, fishing is closed practically twice as much as it is open in the current management plan. These measures alone put hardship on our fishermen, processors, communities and this historic salmon fishery. Adding to that with an all-out closure of the South Peninsula fishery will not improve the Chignik run, but it will do lasting damaging.
- The unfortunate low salmon runs are occurring throughout the Gulf of Alaska this year, and are likely caused by environmental conditions, not South Peninsula fishermen.

Again, the two recent emergency petitions submitted by BBNA and the Chignik Advisory Committee seeking to further restrict or close the South Peninsula salmon fisheries should be denied at this time.

Sincerely,

James Kenezuroff
President



Submitted By
Benjamin Allen
Submitted On
7/9/2018 9:55:14 PM
Affiliation
Chignik AC member

Phone
9077494149
Email
bentallen@hotmail.com
Address
Po Box 84
William St. Lot #11
Chignik, Alaska 99564

Mr. Chairman, Members of the Board, My name is Benjamin Allen, I am a resident, an AC member and a fisherman in Chignik, my family has fished here for over 50 years. The community of Chignik has lost all of its sustainability and no longer has economic viability in its current state. If interception fisheries continue without conservation measures Chignik's entire run will essentially die off. For years our area has pleaded with the board to help create regulations that gives access back to our areas returning local sockeye stocks knowing that they were depleting rapidly. And for years the interception areas have said over and over again these are traditional fisheries. I agree the other fisheries are traditional as much as any other ones including our own, but allocating fish away from an area to spread the wealth until an entire run becomes extinct, with all due respect, is as stupid as it gets. We have specifically asked you the Board in the past to create some type of safeguard in the event that our run comes in so poorly that devastation could happen. Our response from the board was that an EO could come from the Commissioner at any time to protect us. Well that time has come and the protection did not and now we sit on the beach while our run depletes into devastation while area M goes almost unrestricted on the other side of the imaginary line The Board has created but fish know nothing about. In the June fishery of Area M there is no windows of opportunity for the fish to go by unencumbered without at least one of the three gear types in the water. There needs to be at least 2 days a week that the fish have the ability (net free waters) to make it to their destination rivers creating a well rounded stock return. Understandably each fisherman wishes to fish in their own area that they have poured their own money, time, resources and hard work into, but there are creative ways to accomplish that without removing the ability to prosecute fish that are in abundance returning to other areas. One such idea is to tie the Shumigan Islands and Dolgoi sections into not fishing unless Chignik weir is meeting its escapement, and leave the Belkofski Bay section and Western districts without conservation ties as we are presently unaware of a significant amount of Chignik sockeye stocks in those areas. A second would be to group the gear types together creating windows that reduces constant interception in the month of June. You will likely hear, on the opposing side, these restrictions would cause difficulties and due stress on the fisherman of that area, related to long travel times and lack of traditional fisheries. But we would have the same argument for our area if we even had a fishery. Our runtime is 20 hrs or more depending on the speed of the boat from one area to another. Some of our areas are shut down due to lack of fish and we must move to a different area where some are available. In one of the more recent years we were pushed into a single section of our region because the pink populace of the state was low. In the Chignik area our fisheries are traditional as well so it is a mute point to use that for an argument. Our Early run is over 140,000 fish behind it's minimum escapement which is about 50% under the necessary amount for a sustainable run. We are now falling behind on our second run. Without protection from the board we won't have any run in this area at all in years to come. The Commissioner, by emergency order, tried to reduce fishing time this year in Area M, By cutting their fishing time in half. This only created a one-day fishing gap in the Shumigans and Dolgoi sections. It also created a reduction in the Unimak, Cold Bay, Belkofski bay sections that was unnecessary for the intended purpose. Using these broad stroke of the brush methods, instead of a surgical regulation is ineffective and damaging to both areas. The ADF&G is bound by regulations that are created by you the Board and you must take action. Thank you for taking the time to read this letter and I hope you see our plight. Our run is declining and without your intervention everything will be lost. Sincerely, Benjamin Allen William St. Lot #11 Chignik, AK 99564 (907)749-4149



From: Beth Fields
To: [DEG, BOF Comments \(DEG sponsored\)](#)
Subject: Bristol Bay Native Association emergency petition, Chignik sockeye
Date: Monday, July 9, 2018 3:48:28 PM

July 9, 2018

RE: Bristol Bay Native Association emergency petition, Chignik sockeye

Chairman Jensen and members of the Board of Fish,

My name is Beth Fields and I have participated in the Kodiak salmon fishery since 1983 as a setnetter in Uyak Bay. My family and my crew depend on sustainable management of our fisheries resources and we believe in ADF&G management. Having a salmon meeting at the peak of the salmon season in Anchorage is bad for public policy. Not allowing the public to testify is bad for the process.

Like all species, salmon experience natural up and down cycles in run strength and timing. Our managers have the tools to be able to properly manage for these fluctuations and should not be micro managed mid season.

Please let the managers do their jobs and address these proposal in their cycle or at the Worksession in October.

Sincerely,
Beth Fields
P.O. Box 1691
Kodiak, AK. 99615
Wbfields@gci.net



Submitted By
Brad Aga
Submitted On
7/8/2018 8:44:19 PM
Affiliation
KMA purse seine permit holder

Phone
907-512-7029
Email
charlotteatmoore@gmail.com
Address
PO Box 176
Larsen Bay, Alaska 99624

My name is Brad Michael Aga, a 4th generation fisherman from Larsen Bay, Alaska, where I currently reside. My son, a 5th generation fisherman, also has an active interest in our fishing operations. I am the Captain of the F/V Aleut Spirit and KMA purse seine permit holder for the last 5 years. Previous to that I have fished since the early 1980s, including purse seining and set netting. My family and community depend on my success at harvesting sockeye, as well as other varieties of fish for subsistence as well as our annual income.

We oppose with the strongest possible means to further restrictions from outside parties that may limit an already weak industry. It appears to me that the fishing is off across the entire state of Alaska this year, not only Kenai or Chignik, but everywhere. When is the last time you've closed Ship Creek or dip netting on the Kenai, or closing the Buskin River in Kodiak to subsistence fishing? This is a difficult and risky business with minimal returns; therefore outside parties maneuvering without public input at local forums should not be tolerated, especially in the middle of a salmon season when the fisherman are not available for the forums.

I appreciate this opportunity to voice my opinion on this important issue to my family and community and stand available to assist in voicing our concerns further at your convenience.

Respectfully submitted,

Brad M. Aga



July 9, 2017

Dear Board of Fish,

I am writing in support of the Chignik Fishery and would like to express my extreme concern in that I am very worried about the future and the current condition of the fishery. I am very unhappy on how it is being handled and how this fishery has always been overlooked.

I understand Area M has a net in the Water 24/7 and has no escapement goals to tend by, while we sit on the beach waiting for our escapement, fully knowing they as well as Kodiak are catching the fish that we are sitting here waiting for, it's not a good feeling, knowing that the Alaska Department of Fish & Game know this and does nothing about it and you wonder why we have trust issues.

We would definitely like to have our own management and work along with the other Management areas as well as have more studies done and not be overlooked.

Sincerely,

Brendan Orloff

Seriously Concerned Fisherman



From: Bryan Horn
To: [DEG, BOF Comments \(DEG sponsored\)](#)
Subject: Kodiak closure
Date: Wednesday, July 4, 2018 11:02:11 AM

To whom it may concern:

I Bryan Horn, oppose any further restrictions to the Kodiak salmon fishery. The genetic samples taken from fish delivered to Kodiak show that with the exception on the cape igvak section Kodiak fishermen catch very few chignik bound salmon. There has been no openers in the cape igvak section of the Kodiak area to allow passage for chignik bound salmon to return. Also Kodiak will be limited to 57 hours of fishing in the month of July. Further limiting Kodiak's management plan will be detrimental to Kodiak's economy. I urge you to dismiss this proposal.

Thank you for your time
Bryan Horn

Sent from my iPhone

July 3, 2018

Commissioner Sam Cotten
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, Alaska 99518-1565

and

Nick Sagalkin, Regional Supervisor
Alaska Department of Fish and Game
351 Research Court
Kodiak, AK 99615-7400

Subject: 2018 Chignik Commercial Salmon Mgmt. Relative to GSI Analysis

Dear Commissioner Cotten and Reg. Supervisor Sagalkin:

The Chignik AC wants it made known that it has requested repetitively, of the Alaska Department Fish and Game, to use the 2018 in season GSI study for in season analysis, rather than waiting until late or post-season for analysis of the results. The Chignik Regional Aquaculture Association has clearly offered logistical support and financial support to cover any lack of funding to do this. The City of Chignik is on record in complete agreement with this request and also offered to contribute to any deficit in ability to pay for the shipping of in-season samples for analysis.

The Department of Fish and Game has stated their position during the June 29th Chignik AC Meeting as being that they will not be differing their management plan based on information from the samples if they were analyzed in season and that they will base decisions on a model built on historical data (which will include the past six years of GSI information).

Due to the well-known fact that the 2018 run is atypical from the historical data averages, it raises the probability that the model approach will not apply accurately.

The Department of Fish and Game have repeatedly stated that they are reviewing data daily and are taking a day by day approach to the Chignik low escapement crisis rather than defining any precautionary plans that could or would be activated if certain defined thresholds occurred.

This being the case, with on the fly evaluations being the chosen approach, we believe the Department is being belligerently negligent in refusing to evaluate the GSI samples



in season as they have for the past 6 years. We believe that it is prudent to evaluate any and all information, as soon as possible, when proceeding with management of the Chignik sockeye salmon run in light of the historically low escapement numbers.

It should be noted that Chignik has two distinct runs from the same drainage and the Chignik Lake run (the second run) will be returning to some, as of yet, unknown degree. While models using historical scale analysis data (averaged) are most likely adequate for managing typical sockeye runs, the 2018 salmon returns do not align with other runs in the past. This leaves a probability that the models will not be accurate in representing the first to second run escapement figures. Accepting potential inaccuracy runs in the face of the "day to day" approach being used presently by the Department.

The Chignik AC, again, urgently requests the Department to use any and all information sources available, including in-season GSI sample analysis, to give due diligence in making management decisions that affect the wellbeing and sustainability of the Chignik sockeye runs, the financial wellbeing of the Chignik commercial fishing fleet, and the economic and cultural wellbeing of the five Chignik communities.

Sincerely,

Jacob Shangin, Chignik Advisory Committee Chairman

**Chignik Advisory Committee
3/30/2018
Teleconference**

- I. Call to Order: 1:40 p.m. by Jacob Shangin, Chair
- II. Roll Call:
- Members Present: Jacob Shangin, Ivanof Bay
Alfredo Abou Eid, Vice Chair, Chignik Lagoon
Raechel Allen, Chignik Bay
Gene Carlson, Chignik Bay
Ben Allen, Chignik Bay
Al Anderson, Chignik Lagoon
Gary Anderson, Chignik Lagoon
Steven Shangin, Ivanof Bay
Edgar Shangin, Ivanof Bay
Marty Takak, Chignik Lake (seated after role call)
Clinton Boskofsky, Chignik Lake (seated after roll call and entered meeting shortly after roll call)
- Members Absent: Ronald Lind, Chignik Lake
Patrick Kosbruk, Perryville
Austin Shangin, Perryville
Boris Kosbruk Jr., Perryville
Brandon Daugherty, Alternate
Rome Abou Eid, Alternate

Number Needed for Quorum on AC: 8

List of User Groups Present: The Chignik AC is comprised of three members from each of the five communities in the region and 2 alternates. Chignik Bay, Chignik Lagoon, Ivanof Bay, and Chignik Lake were represented.

- III. Seating of New Members: Gary made the motion to Seat Marty Takak and Clinton Boskosky. Steven seconded. Unanimous consent was given.
- IV. Approval of Agenda: Requests to add discussion of a Chinook issue, reds in the Shumagins, Westward openings, and a cod issue needing follow up were made. Ben made a motion to adopt with additions. Unanimous approval was given.
- V. Introductions: Fish and Game Staff present were Taryn O'Connor-Brito, Board Support; Dawn Wilburn, Chignik Area Management Biologist; Ross Renick, Assistant Area Management Biologist; Lucas Stumpf, Sand Point Area Management Biologist; Tyler Polum, Sport Fish; Brian Davis, Subsistence

Guests Present were Don Bumpus, George Anderson, Arron Anderson, Rodney Anderson, Jeremy Anderson, Eugene Anderson, Bruce Barrett, CRAA; Chuck McCallum, CRAA; Earnie Wiess, Aleutians East Borough; Dan Anderson, Homer AC

- VI. ADF&G Staff Updates: Dawn Wilburn said the Harvest Strategy was available online and that bids were being accepted for the Chignik Weir installation and that notice was e-mailed to everyone on the list to receive updates from Chignik management.

Taryn gave notice that the Joint Board tentatively planned to meet March 21-25, 2019 in Anchorage.

- VII. Comments and Concerns: Nothing further was brought up. The concerns were added during the agenda approval process.

- VIII. New Business:

1. *Proposals for submission to the Board of Fisheries 18-19 Regulatory Cycle (April 10th deadline)*

Bruce Barret spoke to the proposal which would allow retention of commercially caught Chinook in the Chignik Bay District by subsistence permit holders onboard the catching vessel for subsistence purposes. Gary made the motion to adopt and Ben seconded. Al addressed his Chinook escapement concerns that would need a separate proposal. Lengthy discussion then took place over the proposal on the table. The Department pointed out catch and release currently used is designed to achieve more spawners in river. The proposal as written does not give incentive to avoid keeping salmon that could survive. Also, current regs state that commercial harvesters may not retain salmon for subsistence during an opener. It was pointed out that calling personal use “subsistence” is not an accurate term, however, personal use of Kings are primarily used locally. While the AC members and community participants had deep concern for escapement, they also held deep conviction to avoid waste of the resource. It was suggested to look at other programs around the state such as in Cordova to mitigate waste. It was pointed out that the fishery used rolling wedges now rather than brailing and the Kings are often under the most pressure when lifting fish aboard. It was questioned if the lower escapement requirements on sockeye were causing more fishing time leading to higher harvest rates of the Chinook. It was also questioned whether the commercial release of kings was noticeable by an increase in escapement numbers and the Department couldn’t say definitively. A community member suggested a CRAA study. A vote to accept the proposal as written resulted in 6 opposed, 2 abstentions, and 1 in favor.

Next, Al requested the AC to submit a proposal addressing poor Chinook returns that would

1. Stop including jack Chinook in the escapement count
2. Raise the lower Chinook escapement objective to 1,600 or revert back to the older goals of 1,500 to 3,000 and
3. Curtail in river (above the weir) sport fishing as the first option if Chinook escapement goals aren’t being met.

Included in the discussion was the concern that there was no requirement to report Federal Subsistence numbers and that the number taken was not known. Dawn Wilburn would contact John Gerkin, Federal Subsistence Manager, about this. It was pointed



out the Department was responsible for escapement goals and that they were currently in the process of reviewing and addressing data and those for Chignik River. It was pointed out 2011 was the initial decline but Chignik has a less pronounced problem than most of the state. The initial request for the AC to submit a Chinook proposal was redirected into CRAA drafting a letter to the Department presenting Al's suggested requests to be submitted by the AC. Al made the motion and Alfredo seconded. The motion passed unanimously.

Alfredo then introduced his concerns about sockeye in the Shumagins. He pointed out that Chignik fleet is often unable to fish while waiting for escapement that is just short (5,000 to 10,000 fish) of escapement. Last year for 12 days in July the Chignik fleet waited while the daily catches in the Shumagins were often in the 60K to 90K range and the Shumagin catch in 6 days was over 428K. He pointed to a persistent decline in the second run being of concern. The Chinook run in Chignik is also weakening. He sees efforts increasing in the Shumagins over time as multiple permits held by individuals were sold there by adding more participants. He sees more effort per unit as bigger boats and better gear are employed. He would like to see closures for non-terminal areas when there are escapement issues in neighboring terminal areas and the use of emergency order closures as well. His view is a day or more closure would get Chignik escapement up so the Chignik fleet could fish. We lose opportunity to harvest other available salmon species during closures. He would like to introduce windows of "no gear in the water". Others agreed with various points he made and the fact that there is always a salmon gear type fishing in Area M was mentioned. It was thought that Axel was already drafting a proposal of this nature and Chuck said CRAA could work on a proposal addressing windows. It was decided the AC would review these proposals when they were published.

CRAA then apprised the AC of proposals already submitted by individuals. There were two Dolgoi proposals, one submitted by Chuck and one by George A. There were two proposals addressing June openings in the Western and Perryville Districts. One authored by Don Bumpus and one jointly authored by Edgar and Patrick. The question of why the Western District is managed with two 48 hr openings was understood to be from the restrictions in the 60's and 70's as part of the sockeye run rebuilding effort and was never changed. Al agreed. He added his disappointment of more recent reduction in escapement goals after having been through those rebuilding efforts. These proposals will also be discussed in more detail after they are published. Ben brought up two proposals that were drafted pertaining to the adjusting the August/September escapement goals. Divided views were discussed. The benefits of carcasses fertilizing the river was discussed. FRI studies were cited that carcasses were of less importance to the Chignik system due to various nutrients from volcanic sources. It was discussed that the communities could work with CRAA to have an independent review of escapement goals as ideas differ as to what escapement should be. Coho predation was mentioned and it was noted that most would agree Coho do affect Sockeye. There was some consensus that if sockeye escapement were not affected then a fishery on Coho would be reasonable.

A topic shift took place and an update was given about the in-season management changes. Dawn explained the overall escapement goals would remain the same but that the shift in daily goals reflected the review of historical run timing data. Also, the transition management will not use the genetic testing and the genetic information will be applied and adjust the escapement numbers post season. This decision was in part because of the inconsistent air taxi service to get the samples out, however, it was primarily because the

information was too delayed to make decisions from. Strong concern was voiced that the testing could still be a useful tool for evaluating in-season irregularities (such as in 2017) and particularly in evaluating the second run. Bruce suggested using prior years data would assume average run strength for both runs where the genetic sampling in-season lends itself to evaluating the second run. Information, even delayed, is appreciated. It was asked if the information, even if not used, could be made immediately public. It was noted that CRAA would continue evaluating the effects of the changes. There was also concern that shifting around escapement numbers would affect subsistence users in early June. Some concern was given to possible effects on when Igvak opened. It was also mentioned that Area M could affect run timing if they harvested large amounts of Chignik stock in the Dolgoi area for instance.

For the final proposal addressed, Alfredo asks the AC to take action and develop a Council Proposal to change the 20 mile sealion haul out boundary to 3 miles as the Board of fish did for state only cod permit holders. Chuck presented the history of this request. Chuck and Alfredo will draft language for the AC to consider during the next scheduled meeting.

2. *Discussion of Joint Board Call for Proposals (May 1st deadline)*

There was none. Taryn would be available to help individuals if they wanted to submit anything.

IX. Other/Miscellaneous AC Business: There was none.

X. Set Date/Location of Next Meeting: Tentatively scheduled for Thursday, September 27th at 1:30 p.m. with the exact date forthcoming.

Adjournment: 5:35 p.m.

Minutes Recorded By: Raechel Allen

Minutes Approved By: Jacob Shangin

Date: 7/7/1

**Chignik Advisory Committee
6/22/2018
Teleconference**

I. Call to Order: 9:40 a.m. by Jacob Shangin, Chair

II. Roll Call:

Members Present: Jacob Shangin, Ivanof Bay
 Alfredo Abou Eid, Chignik Lagoon
 Raechel Allen, Chignik Bay
 Gene Carlson, Chignik Bay
 Ben Allen, Chignik Bay
 Clinton Boskofsky, Chignik Lake
 Marty Takak, Chignik Lake
 Al Anderson, Chignik Lagoon
 Gary Anderson, Chignik Lagoon
 Austin Shangin, Perryville
 Boris Kosbruk Jr., Perryville
 Edgar Shangin, Ivanof Bay
 Stephen Shangin, Ivanof Bay
 Brandon Daugherty, Alternate
 Rame AbouEid, Alternate

Members Absent: Patrick Kosbruk, Perryville -excused medical

Number Needed for Quorum on AC: 8

List of User Groups Present: The Chignik AC is comprised of three members from each of the five communities in the region and 2 alternates. All communities are represented.

III. Approval of Agenda: Gary made a motion to approve the minutes. It was seconded by Alfredo. The agenda was unanimously approved.

IV. Fish and Game Staff Present: Nick Sagalkin, Jeff Wadle, Tyler Polum, Area Manager; Dawn Wilburn, Chignik Area Management Biologist; Ross Renick, Assistant Area Management Biologist; Lisa Fox, S. Peninsula Manager; Brian Davis, Jon Gerkin, Federal Subsistence; George Papas; Lisa Olsen, Fish and Game; Lisa Scarborough, Subsistence; Sam Cotton, Commissioner;



Guests Present: Marit Van Dort, Far West; Chuck McCallum, CRAA; Debbie Carlson, Chignik Bay Tribal; Cody Larson, BBNA; Gayla Hoseth, BBNA; Christopher Maines, BBNA; Richard Sharpe, Mayor of Chignik; George Anderson, Chignik Lagoon; Kelsin Orloff; Dakota Anderson; Ronald Lind; Guy Ashby; Tim Murphy; Daniel Anderson; Jason Alexander; Wally Hinderer; Gerald Kosbruk; Tony Gregorio, Earnie Carlson, Jack Rantz, Frank Kasheverof, Peter Anderson, Alana Anderson, William Jones, Ray Erickson, Henry Erickson, Jaime Moore, Jeffrey Moore, John Jones Jr., Jennie Grunert, Dan Grunert,

V. ADF&G Staff Updates: Jeff Wadle shared that decisions on the escapement situation through the Department won't be made until Sunday. Ross Renick said approximately 7,500 escaped yesterday bringing the total to 41,000. The male to female ratio is about 2:1 and the quality of spawners is increasing with length increasing from 480 mm to 530 mm and ocean age 3 fish are increasing as well.

VI. Comments and Concerns: Subsistence and Commercial

Al commented that in 2014 we had same problem with poor spawner quality and locals gave warnings to the Department. He asked if the department was going to adjust escapement to reflect the poor quality of the spawners.

Jeff Wadle explained it was good news there were more males because it meant the run is still coming in. Al believes local knowledge is being ignored and expects to see this problem repeated in another 4 years.

Bruce Barrett requested what brood years were involved. 3 ocean and 2 ocean. Ross Rennick said 2013 for 1-3's and 2014 for 1-2's.

Marit Van Dort asked what the management policy is for the intercept fisheries and the last action was. Jeff listed 16 050 60, 5AAC 09 365 (area M), and 5AAC 15.357 (Chignik). He explained that this year was unusual and unprecedented and a statutory authority in the form of an Emergency Order was used to make restrictions on Area M. Igvak is already closed.

Alfredo asked what was the percentage, the component, of Chignik fish in the Shumagins to use to determine what percentage of the 305,000 Shumagin catch was Chignik bound fish so far this year. The Department answered that they don't have in season stock composition in Area M and referred to the WASSIP Study (2006-2009). Jeff cited the range being from 1.1% to 38.4% with the average at 14.2%. Alfredo figures that is over 30,000 sockeye and explains we really need those fish this year and is worried we are going to lose our run.

The Chair redirects back to subsistence topic.

Tony testified that the other day out of 120 fish he caught, 90 were males fish with mediocre spawn. He noted that other areas don't count these small fish. He figures it would take 15 years to rebuild this run and it seems we are just a hatchery for other areas. The villages are going to die.

Raechel asked what the plans were for subsistence now. Jeff said there are no plans to restrict subsistence from the state.

Alfredo is thankful for the restrictions placed on Area M and asks if there will be anymore in the future. Jeff said they are looking daily at escapement and will make a decision on Sunday.



Marit asked what the decision is based on, what numbers are used, what is the plan. Jeff responded that it was a good question and the Department is looking at historical data, daily escapement and looking at it day by day and stated that there was no specific number to give right now. Marit then asks what happens if you don't get escapement? What happens on different scenarios is what she hears people wanting to know. Jeff responds it is a tough question and states there is no good answer. Marit asks for more information. What is the basis for, what is the process for, and when will decisions occur or at what point. It's important to explain these to people. Nick explains the Department is having daily meetings with the Commissioner, the Director, and chief scientists to evaluate the situation. All areas are upset with actions. There is pressure from all directions. It's a juggling act to keep the cards on the table and the public updated and the problem is if a metric of direction is given out front and something else is learned tomorrow it is difficult to make a new decision. The Department is trying to make as good of a decision as possible. Marit asks is there a process because communication is key and the health of the run, in perpetuity, is of the most importance to the people she represents.

George Anderson gives appreciation for the Department being at meeting. He asked if they would consider using the GSI in season to apportion 1st and 2nd run, CRAA would like to assist. Department acknowledges letter from CRAA on that topic and that they are evaluating the pros and cons.

Wally Hinderer stated the Department should be able to apportion a percent to the run to quality spawners to poor quality spawners. Jeff Wadle states they are still viable just smaller. Wally asks how many are females. The Department will get that information.

Alfredo asks Lisa in Area M about the gear types and when they are fishing and notes that we are still sitting on the beach after the expense of gearing up for the fishery. Lisa Fox reported the drift and seine fleets opened on the 20th and closed last night, 48 hours earlier than usual. The set gillnet fleet was now open. Alfredo appreciates that Area M had shorter openings but stated that we are a terminal fishery and Area M is interception and we still aren't meeting escapement. He would like to see the interception openings shortened.

Ben asks Jeff Wadle, since they don't plan on shutting down subsistence, what is the point, how bad does the situation need be to shut down subsistence? He notes department optimism and wonders what the cutoff point is. Jeff doesn't have that number or an answer. Jeff acknowledges the importance of subsistence to Chignik and that if the entire Area M fishery had to be closed, he would then look at closing subsistence. Even then seine subsistence would close first and not gillnet gear. Nick Sagalkin stated the reluctance to close the subsistence fishery doesn't represent optimism for the run but rather a belief that subsistence is so important to Chignik. Ben understands balancing between user groups and areas but his concern is for the future generations in Chignik and doesn't expect to fish commercially but doesn't think it's right to have 14% being intercepted when Chignik is in the situation it is at.

Rodney Intagliata states he hears the department saying they don't know what critical numbers or points of action are and he is concern that by the time they reach decisions it will be too late. He believes it is mismanagement to not have more direct answers for the fisherman and public. He thanks the Department for attending the meeting and for their time. Jeff responds that they have seen very low escapement before (not this low) and the run had still continued to return and propagate.



Al asks why more action had not been taken toward this year's escapement. Shortening one opening isn't enough. In 2014 the small fish were not an indication that the run was coming. It was the first time he's seen the anomaly. Would the Department entertain a proposal to address small males in escapement? Jeff indicated they would look at any proposals, those salmon are viable and the department would not suggest a proposal. Other areas deal with jacks while the small males here are viable. Generalized comments of understanding biology and male to female ratios were shared by attendees. Commissioner Sam Cotton joined the meeting.

Bruce Barrett points out the documented impact of the Dolgoi fishery on Chignik stocks. The contribution of Chignik fish in the Shumagins and Dolgoi area raises in later June and July. The WASSIP study was during weak Chignik runs. In the WASSIP years, Igvak and SEDM didn't fish due to Chignik low escapement. It would be reasonable to close the Dolgoi area to protect escapement as well as the Shumagins. Also, the GSI evaluated in season would be a useful tool to evaluate run strength more so than the model which has nothing in history to correspond with a run like 2018 to keep from assuming the first and second run strengths.

Commercial Discussion:

Marit appreciates the restriction in Area M to date but wants to know what the justification for keeping the fishery open at all given the dismal returns to Chignik. Jeff responds that there are other stocks in Area M and so the Department tried to save some Chignik stocks but not just Chignik stocks.

Alfredo points out that many areas are slow this year and interception fisheries should be restricted while the other areas strengthen.

Raechel asked what the precedence was to allow interception to open while other terminal areas are depressed. Jeff answered that the justification was for a restriction in Area M.

Marit asks to hear from Commissioner on his thoughts on the process is. He responded that the Board of Fish sets the prescribed openings. It is unprecedented (the situation in Chignik) and there is no prescribed plan to address a situation like this in Chignik. Marit asked if there are contingencies being developed for July. Commissioner Cotton answered that the Board has not set any specific plan. He said we don't have a set plan. We have to deal with it as we are able with the information we have on hand. Nick Sagalkin adds that the ranks in the Department deal with this situation on a daily basis. It is the main issue on the plate.

Alana Anderson asks if the department is at this time only dealing with escapement or if they are considering the commercial fisheries in Chignik and openings or not. Jeff responded that if there is sufficient late run then we will try. It's day to day. Alana asks if they were willing to step down the interception fisheries to give some relief to Chignik's commercial fleet by getting some fish here. Jeff responds, no we would relieve the restrictions on the S. Pen.

Alfredo states that Chignik has no other fisheries to turn to. No cod, no tanner, no halibut for most people.

Wally comments that it is the Board's job to allocate fish and we need to look to that direction now.



Ben wants the Area M fishing efforts pushed toward Unimak to keep their concentration on the Bristol Bay stocks and alleviate pressure on Chignik stocks. Too little too late is going to kill this run in Chignik.

Tony Gregorio stated he has been to the Board of Fish meetings as AC for years, listening to terms like “sustainability” and the rules and regs are outdated. We are left sitting, holding the bag. We go to the Board and ask for change and little happens. The burden of conservation must be shared by everybody and the rules must be revised so this doesn’t happen here in Chignik again. The Shumagins are essentially an unregulated fishery and we need to get GSI study there or new rules. Bruce agrees with Tony. 2019 forecast looks dismal at best and likely won’t support a fishery.

Al would like to hear from Department Staff when is the peak of the run. He expressed frustration that the Department never has the answers when asked and has to look at it. Bruce said it is likely right now. Run timing varies year to year. The Department agrees and said historically it is right now and that we don’t know what it is this year.

Al has seen a drop in escapement over the years and it doesn’t seem like anyone in the Department is noticing or doing any homework on it.

Earnie Carlson asked for follow up on the recommendation that the Department do the GSI study with in season results.

Gary brings to light that for 10 years we’ve been working on the lower end of our escapement goals and maybe we should switch that up. He thanks the Department for coming to the rescue and that hopefully it’s not too little, too late.

The Chair directs the AC to look at what action it can take to help the Board in addressing this issue.

Alfredo urges the Department to do everything they can to get our escapement met.

The Chair asks if the AC would like to take action on the GSI in season studies.

Ben agrees that we should pursue getting the GSI back. Gayla Hoseth suggests that the AC put in a letter of petition of a emergency meeting and that BBNA would be doing likewise.

Al supports the GSI request and suggests the department uses Lake Clark to expedite transportation if that is an issue. He also supports a letter petitioning the Board of Fish.

George Anderson would like OSM, quality of escapement, and other ways to enumerate escapement, put on the agenda for the next meeting.

Ben asks Department how to approach this GSI request. The Department doesn’t think any more needs to be done beyond the CRAA letter. They are not ready to make a decision yet.

Al makes motion to take up the tribe’s recommendation. The chair suggests putting it on the next meeting.

Ben makes a motion to have the AC draft a letter to the Department of Fish and Game seeking GSI analysis in season. Alfredo seconds. Edgar asks for unanimous consent.

Alfredo makes a motion to draft a letter to request an emergency meeting by the Board of fish and game. Seconded by Edgar. Discussion took place. Nick suggests an emergency petition and to meet the criteria and to meet on a particular action and present a solution. Ben asks about



agenda change request. There is an August deadline and a unique set of criteria. Since we are in cycle it is rather a late proposal. Al would like to see if Gayla and BBNA could help with letter. Gayla requests forming a committee of AC members to work with in drafting a letter. Chuck notes that an emergency meeting isn't a broad call for a meeting and the need for another AC meeting to get the main points. The Chair points out time is of the essence. The original motion is withdrawn.

Ben proposes that the Chair is given authority to form a committee to work with BBNA to write an emergency petition letter to the Board to be approved after AC has reviewed. Alfredo seconds. Edgar moves for unanimous consent. Motion passes

Committee is formed to include Alfredo, Marty, Ben, Austin, Boris, Jacob, and Chuck from CRAA. One-point contact though Jacob to Gayla is chosen for the committee.

- VII. Other/Miscellaneous AC Business: Jon Gerkin with Fish and Wildlife announced that subsistence on federal waters is closed but a social and cultural permit may be obtained. 907- 271-2776 can be called for more information.

July 21st is a meeting for another emergency petition Chuck said. Tony requests updates from fish and game. Jeff again reminds it is day by day. Al asks about joint resolution letter made by Ivanoff and Perryville and makes motion to support it. Alfredo seconds. The letter will go to Governor Walker and ask for an emergency fishing declaration. Gary calls question. Al requests unanimous consent. Motion passes.

Recess is requested. Thanks and appreciation is given to the Fish and Game for being available at this meeting.

- VIII. Set Date/Location of Next Meeting: Will reconvene on Thursday, June 28th at 9:30 a.m.

Adjournment: postponed
Recessed at 11:52 p.m.

Minutes Recorded By: Raechel Allen

June 28th, 2018
Chignik AC Meeting
Reconvened

- I. Call to Order: 9:38 a.m. by Alfredo AbouEid, Vice chair
- II. Roll Call: Ben Allen, Raechel Allen, Gene Carlson, Alfredo AbouEid, Al Anderson, Gary Anderson, Marty Takak, Clinton Boskofsky, Austin Shangin, Brandon Daugherty, Rome AbouEid, Edgar Shangin (joined meeting post rollcall), Boris Kosbruck (joined meeting post roll call)
- III. Staff Present: Dawn Wilburn, Chignik Management; Ross Renick, Chignik Management; Jeff Wadle, Kodiak Management; Tyler Polum, Sport Fish; Forrest Bowers, Fish and Game Juneau; Brian Davis, Subsistence; Lisa Scarborough, Subsistence; Lisa Olson, Deputy Director

Guests: Jason Alexander, F/V Cap'n J; Oxinia Odimon; Gayla Hoseth, BBNA; Cody Larson, BBNA; Debbie Carlson, Chignik Bay Tribal; Bruce Barrett, CRAA; Chuck McCallam, CRAA; Marit VanDort, Far West; Jeff Balldock, FRI; Steve Bartlic, FRI; Hank Brandel, Chignik Lagoon; Henry Erickson, Chignik Lagoon; Raymond Erickson, Chignik Lagoon; Wally Hinderer, Chignik Bay; John Jones, Chignik Lagoon, Earnie Carlson, Chignik Bay; Chickie Carlson, Chignik Bay; Mitch Borden, KDLG; Peter Anderson, Chignik Bay; Paul R. Johnson, F/V Geo J; Dale Carlson, Chignik Bay; Alana Anderson, Chignik Bay; Frank Kasheverof, F/V Defiant;
- IV. Old Business: Chuck announces the Board has received BBNA resolution that includes request for an emergency petition. Forrest Bowers updated that on July 17th there is a meeting to take up another matter and it will be heard then. Also, received is a letter from a group of signatories to have the Department communicate its intent in regard to management of the subsistence fishery in Chignik. A response is being formed. But basically, there is no need to shut subsistence.
Chuck advises the AC to take its own action and form of a letter to the board for an emergency meeting. Chuck and Bruce both worked on the draft in length. Chuck introduced the letter and read two option solutions within: a conservation tie to SEDM or have a harvest preference in place.
Bruce explained that we are at 47% of escapement and we don't expect Kodiak to have any effect on Chignik escapement this year. He goes on to explain letter option details.
Raechel shares the opinion that the June 21st is a bit late and Chignik knew by June 15th that there was a problem. Al agrees 100%. The travel time from Area M is up to 7 or 8 days and the run will be lost by then. Alfredo states that the 21st is the 1st run peak in Chignik.
Escapement needs to be met before any fishing group takes fish. Raechel points out the Bristol Bay component will be able to be harvested farther west in Unimak. Alfredo asks Jeff Wadle, what is caught in the last 5 days? Jeff said 140,000 sockeye S.Pen, 40,000 in the Shumagins and the rest in Unimak. Alfredo states Chignik needs those fish for escapement. Ben thinks the trend can be recognized before the 21st of June and this isn't just Chignik fish being taken but Kodiak fish also. Forrest reminds the AC that action has been taken to reduce fishing time in the S. Peninsula. Raechel said we have great appreciation for that



action and believes it is a step in the right direction. Ben points out that the majority, during the 5 days, were caught in two days and that's how fast impact can happen. Jeff Moore said he has friends in Bristol Bay and Nelson Lagoon who don't feel they have voice. They are losing their culture. Fishery is the social fabric that holds their culture together. Al asks for clarification on the closures given in Area M and addresses the perception that it didn't give much time that fishing didn't take place. Jeff Wadle explains the different periods for gear groups and that they were equally restricted. Al questions that the 80-hour period was still covered by active fishing. Jeff thinks there was some time of no fishing. Ben clarified that there was only one day that fishing didn't take place (Sunday June 24th). He doesn't see why Area M gear types have to fish separate periods in June but in July they can fish together. A one-day window doesn't fix the issue. There needs to be conservation ties as Igvak and SEDM have. We appreciate what the Department has done so far, but we need more relief. The situation has moved beyond getting a fishery in Chignik, it is needing protection of the Chignik river basic escapement.

Alfredo points out that there is no plan for this type of emergency and we need to go to the Board and get one in regulation.

Al wants to hear from subsistence users as many have hesitated to participate for concern for escapement. Raymond has yet to pursue subsistence out of concern. Henry has held off from getting subsistence because he is concerned with escapement and having usable runs in the future.

Ben asks Jeff Wadle how the determination is made or assessment is done (based on the presence of Chignik fish in Area M) to open SEDM. Jeff explains the forecast is most important to start then the factor of escapement and openings in Chignik factor in. Then the probability of catch of 300,000 and then 600,000 is assessed. Ben draws attention to the importance of having a Chignik opening proving run strength before interception takes place on Chignik stocks. Especially with the trend of weaker runs.

Discussion about the date in the solution in the emergency petition letter is discussed. It is again noted that interception could be moved farther west from Chignik to minimize impact on Chignik stocks to accommodate early June openings in Area M. It was noted the peak of the Chignik run was the 21st and that date was too late for effecting a useful protection. A member of the public stated need for data and the absurdity of picking a set date to let a interception fishery take place. The consumer wants sustainable fishery products. Bruce Barret recognizes, citing a study, that salmon travel 20 -30 miles a day. Alfredo reminds that we are at less than half of the minimum escapement. It was noted that the wealth of the run has been shared but now the pain needs to be shared as well. It needs to be recognized that Chignik has a fishery on the terminal sockeye stock. Raechel thinks the Dolgoi impact needs to be addressed concerning the 2018 low escapement since documented high levels of Chignik sockeye catch exist there.

Austin makes a motion to put the petition letter on the table. Al seconded.

Al makes a motion to change the date in the petition to the 15th.

George Anderson asks what component is expected to be present in Area M on the 15th vs. the 21st (expecting a difference). Forrest Bowers doesn't know and would like to look at documentation.

Question is called. Boris and Edgar have joined the meeting earlier and are present for the roll call vote. The motion passes unanimously.

Al voices concern about shifting fishing patterns in Area M in regard to the petition solutions. He requests the AC to take more time to study the draft petition. General agreement is given. Tribes will meet today at 3:30 p.m.. There is general discussion of the timeline to produce the petition with help from Gayla, BBNA; and CRAA while realizing urgency to make a decision.

Al suggests making a motion to recess to review petition.

Gene makes the motion to recess until noon, June 29th, 2018 (tomorrow). Rome seconded.

Ben asks for unanimous consent. Motion passes.

Gary asks Ross Renick about the current male to female ratios. Ross says 52% males, 48% females.

John Jones asked for the plan for management as first to second run transition progresses.

Dawn answered that there would probably be no fishing opportunity to avoid targeting early run fish. Ben asked how the timing would be estimated. Dawn answered it is based on run timing curve in the model. The change in age competition is part of the evaluation and the increase in male to female ratios. There is speculation from a member of having the same problem in 2022. Ben doesn't think the model a good fit on an atypical year like this.

Al pursues the impacts of small male spawners as were seen in 2014 and would like closer evaluation in the future.

Earnie Carlson asked about the possibility of inner bay openings. Dawn will be flying surveys soon.

Adjournment: postponed

Recessed at 11:24 p.m. until noon, June 29th, 2018

Minutes Recorded By: Raechel Allen

June 29th, 2018
Chignik AC Meeting
Reconvened

- I. Call to order: 12:10 p.m. by Jacob Shangin

- II. Roll Call: Austin Shangin, Gene Carlson, Clinton Boskofsky, Boris Kosbruk, Marty Takak, Ben Allen, Raechel Allen, Jacob Shangin, Alfredo AbouEid, Al Anderson, Rome AbouEid, Brandon Daugherty

- III. Staff Present: Jeff Wadle, Kodiak Fish and Game; Kevin Shaberg, Fish and Game; Dawn Wilburn, Chignik Management; Ross Renick, Chignik Fish and Game; Lisa Fox, Sand Point;

Guests: Kate Connely, Lake and Pen Borough; Johnney Lind, Chignik Lake; Clide Peterson, Trident; Bruce Barrett, CRAA; Chuck McCallum, CRAA; Cody Larson, BBNA; Craig Astor, Chignik Bay; Marlene Odimon; George Anderson; Dan Anderson; John Jones; Tony Gregorio; Ron Anderson; Wally Hinderer; Elliot Lind, Chignik Lake; Harry Kalmakoff; Donny Lind; Rodney Intagliata, City of Chignik; Earnie Carlson, Chignik Bay;

- IV. Old Business: The latest draft (#8) of the Emergency Petition is introduced. The AC committee to address the letter was asked for any additional comment. There was none. Al makes a motion to accept Draft #8 as written with the exception of minor grammatical changes. Alfredo seconds. Gary calls question. Ben requests unanimous consent. Motion passes.

- V. Other Business: Joint Resolution 2018-02, Further conservation of Chignik Drainage Sockeye Stocks, made by Perryville, Ivanof, and the City of Chignik is introduced. Alfredo made a motion to support Joint Resolution 2018-02. Al seconds. Open discussion.
John Jones asks Staff if 40 hrs and 40 hrs between gear types, with 40 hours removed from each, did in fact give only one full day in June with no gear in the water in Area M. Jeff Wadle verified that. He explained the June periods are done. Lisa Fox verified the first July period is 33 hrs. and the rest 36 hrs. with 60-hour closures and all gear types in the water together.
Alfredo inquires what sockeye catches are in Area M thru last midnight. Lisa responded: Shumagins 404,189; S. Unimak 397,135; Dolgoi 8,345. Alfredo believes that 800,000 is high in light of Chignik not fishing.



Ben asks Staff when will Area M resume fishing and at what point do we start looking at the Area M effect on the second run with the first run. Is the Department poised to act. Lisa says it will start with an immature test fishery and then will open July 6th for 33 hours. Jeff asks Ben to restate his question. Ben asks what the Department plans to do if we have the same issue on the second run. Jeff states he doesn't have a good answer for the second part of the question. It is a day to day strategy, obviously if the run didn't come in, Chignik would be restricted but he doesn't see further restrictions of Area M beyond SEDM.

The chair redirects to the motion.

Alfredo requests unanimous consent. Motion to support Joint Resolution 2018-02 passes.

Chuck asks (on behalf of Patrick) about the change yesterday in allocation on the daily escapement report between 1st and 2nd run. Dawn explained that the sockeye run now appeared to be weak but on time and not late and so the escapement numbers were moved back to reflect that and the numbers were reallocated. Chuck restates the importance of GSI to accurately evaluate on this unusual year.

George asks when the Department will stop counting first run. Dawn said it is considered 100% late run on August 3rd. It is asked when management will switch from 1st run management to late run. Dawn said it is hard to give a specific date but even if late run goals were being met, if significant amounts of 1st run was still coming in, then the fishery would remain closed. Bruce asked about the average catch in Area M July 6th given the presence of given the presence of Chignik sockeye. Lisa will get the data.

Bruce cites salmon travel at 32 miles a day and figures 5-6 days away from weir.

Was GSI sample taken? Jeff states the present plan to evaluate samples post season. Bruce believes even getting 2-3 samples together early would be helpful and sees opportunity to avoid lost harvest time. Jeff says the Department does not see a need for in season analysis given current escapement levels. Chuck considers GSI to be valuable information and CRAA offered to help with logistics getting samples to lab.

Alfredo says we need GSI in season. Pink and Chum won't be enough to carry the people in Chignik.

Rodney Intagliata finds it unacceptable to wait for GSI results post season and states the City and others will get funds if needed to assist. He thanks the Department for their participation in the meeting.

Tony believes [with emphasis] that post-season analysis won't affect any outcomes where in season analysis might.

Bruce asks what the downside of taking samples would be. Jeff says there is no downside, but it doesn't appear to have any effect on management with under escapement. Bruce hears him saying that they assume the second run will be weak, too.

Alfredo states we can't afford mistakes and villages can be destroyed. We have no other fisheries to depend on.

Al wonders if the past GSI studies mattered. Dawn said the data was included in the present model. Bruce doesn't believe the model is suitable to 2018.



Elliot Lind says we have cleaned out the first run over the years and now have to hammer on the second run and then the fish and game took 150,000 off the second run escapement goals and he believes we are now feeling those effects.

Rome asks about the cutoff between runs and if we are going to be sitting on the beach.

Dawn states high probability of closure to escape as many early run fish as possible. The 100% cutoff is August 3rd. It was asked how the cutoff is decided. Dawn answered that it is based on the model.

Al makes a motion to have AC make a strong recommendation letter urging the Department to use the GSI in season. Ben seconded. Ben recommends it states they are neglecting to do their job appropriately and holding off to have plausible deniability and neglecting to use current data. We have stood down from fishing in the past and the GSI showed it was a good decision.

Tony remembers times in past where Department staff wondered why Chignik didn't try to help and now they don't want it.

Alfredo would appreciate the accuracy of the GSI in season.

Question is called. Rome requests unanimous consent.

Jacob and Raechel will draft the letter.

Alfredo asks the Department to please save our escapement; save our run.

It was asked what the plan was for inner bay fishing. Dawn said it can open as early as the 6th and they will be flying. Any opening would be well inside bays.

There is a request to the Department for keeping the fleet up to date on info.

Ben asks for clarification that based on earlier statements by staff and that even though Area M will be fishing, and using our model, that we won't fish in July on sockeye.

Dawn answered that is probably correct. Jeff also said it was correct that there were no plans to restrict the Area M fishery.

Lisa Fox stated that the information isn't broken into areas but 65,841 is the average S.Pen harvest on the July 6th and 7th.

Ray Erickson asks for clarification of what a "significant amount" of early run escapement is that would keep Chignik closed in July. Dawn says it's not specific but if there is 1000's of first run sockeye in a day, it would be kept closed.

Tony asks what part of the escapement range they were shooting for. Dawn answered mid-range.

Adjournment: 1:30 p.m.

Minutes Recorded By: Raechel Allen

Minutes Approved By: Jacob Shagin

Date: 7/7/18



JOINT RESOLUTION – June 21, 2018

**Chignik Bay Tribal Council
Chignik Lagoon Village Council
Chignik Lake Traditional Council
Native Village of Perryville
Ivanof Bay Tribal Council
City of Chignik**

CHIGNIK SOCKEYE FISHERY DISASTER DECLARATION

WHEREAS: Community members from the five Chignik area communities (Chignik Bay, Chignik Lagoon, Chignik Lake, Perryville, and Ivanof Bay) solely depend upon the Chignik area commercial salmon fishery as their primary source of cash income and subsistence salmon harvest needs; and

WHEREAS: As of June 19th, 2018, cumulative sockeye escapement past the Chignik River weir has totaled 14,717 salmon. The salmon returning are sexually immature salmon and proportionally higher in males. Historical ranges of escapement on this date have been 137,389 to 360,888 from 2009 to 2017; and

WHEREAS: Tribal members, resident commercial fishermen and subsistence users from the area have expressed concern for the fishery, as we have never experienced such a low return; and

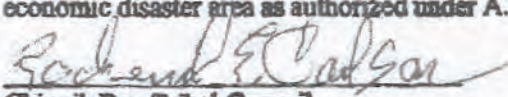
WHEREAS: We depend on our salmon return for our income and subsistence resources. Without our salmon returning we will not be able to purchase home heating fuel, electricity, gasoline, propane, basic food necessities, mortgage payments, boat expenses, and financial loan obligations to the state; and

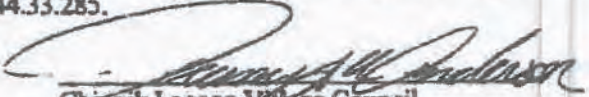
WHEREAS: Chignik River's first run has failed to produce to the point where subsistence users from the area will not meet their basic subsistence sockeye salmon needs; and

WHEREAS: This being the lowest sockeye salmon return to the Chignik salmon fishery, it poses a direct threat to the physical health, transportation needs, safety, and well-being of the five communities in the area; and

WHEREAS: The impact of the failed sockeye salmon return is beyond the capacity of local communities' ability to sustain our economic stability and our subsistence way of life and additional help is necessary.

NOW THEREFORE BE IT RESOLVED the Chignik Bay Tribal Council, Chignik Lagoon Village Council, Chignik Lake Traditional Council, Native Village of Perryville, Ivanof Bay Tribal Council, and City of Chignik request Governor Walker to declare the Chignik management area a fishery economic disaster area as authorized under A.S.44.33.285.


Chignik Bay Tribal Council


Chignik Lagoon Village Council


Chignik Lake Traditional Council


Native Village of Perryville


Ivanof Bay Tribal Council


City of Chignik



JOINT RESOLUTION – June 28, 2018

**Chignik Bay Tribal Council
Chignik Lagoon Village Council
Chignik Lake Traditional Council
Native Village of Perryville
Ivanof Bay Tribal Council
City of Chignik**

FURTHER CONSERVATION OF CHIGNIK DRAINAGE SOCKEYE STOCKS

Resolution 2018-02

- WHEREAS:** Community members from the five Chignik area communities (Chignik Bay, Chignik Lagoon, Chignik Lake, Perryville, and Ivanof Bay) solely depend upon the Chignik area commercial salmon fishery as their primary driver economic and cultural survival, income, and subsistence salmon harvest needs; and
- WHEREAS:** A Joint Resolution dated June 21, 2018, titled Chignik Sockeye Fishery Disaster Declaration was submitted to Governor Walker to urge the declaration of the Chignik Management Area (CMA) a fishery economic disaster on Chignik's first sockeye run; therefore Chignik's second return of sockeye is of extremely high importance to the Chignik fishery and warrants the upmost protection from intercept fisheries, in particular from the Area M (South AK Peninsula) interception; and
- WHEREAS:** In consultation with Alaska Department of Fish and Game and the five tribes, the US Fish and Wildlife Service Office of Subsistence Management has issued an Emergency Special Action No. 8-SS-01-18 closing federal public waters of the Chignik River drainage to the harvest of Sockeye Salmon except by federally qualified subsistence users holding a Social and Cultural Harvest permit beginning June 22, 2018; and
- WHEREAS:** ADF&G issued an Emergency Order No. 4-FS-M-SP-02-18 wherein the commissioner exercised the department's Alaska Title 16 authority reducing harvest opportunity in the Shumagin and South Unimak from two 88 hour periods, to two 40-hour periods, citing conservation concerns for Chignik-bound sockeye salmon in recognition that past studies have shown that significant numbers of Chignik sockeye salmon migrate through the South Peninsula Management Area; and
- WHEREAS:** ADF&G issued an additional Emergency Order No. 4-FS-M-SP-03-18 where the department reduced the harvest effort in the two 40-hour periods; and
- WHEREAS:** The use of in-season Genetic Stock Identification Sampling (GSI) has been utilized in management decisions for the past 6 years, but was discontinued in 2018. We urge in-season GSI to resume to distinguish between Black Lake and Chignik Lake runs. The



impact of the failed first sockeye salmon return (Black Lake) increases the importance of the second run (Chignik Lake); and

WHEREAS: Chignik-bound sockeye salmon migrate through the Shumagins and selected areas of the South Unimak Area to the degree that accountability for stock conservation and terminal harvest opportunity are required. In accordance, it is important for sustainability and accountability to impose a conservation assignment on Chignik-bound sockeye salmon and a basic harvest preference in the Chignik Management Area fishery but still providing reasonable fishing opportunity in Area M.

NOW THEREFORE BE IT RESOLVED the Chignik Bay Tribal Council, Chignik Lagoon Village Council, Chignik Lake Traditional Council, Native Village of Perryville, Ivanof Bay Tribal Council, and City of Chignik request Governor Walker urge the commissioner to exercise his authority, consistent with AS 16.05.060. Emergency Orders, and under the guidance of 5 AAC 39.220 (a) Policy for the management of mixed stock salmon fisheries. (a)(b) and 5 AAC 39.222. Policy for the management of sustainable salmon fisheries,

NOW THEREFORE BE IT FURTHER RESOLVED that immediate regulatory action 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 of 600,000 for terminal area fisherman as described in 5 AAC 09.360, for the Chignik Management Area fishery for 2018 and beyond.

Chignik Bay Tribal Council, President

Chignik Lagoon Village Council, President

Chignik Lake Traditional Council, President

Native Village of Perryville, President

Ivanof Bay Tribal Council, President

City of Chignik, Mayor



Chignik Lagoon
NATIVE CORPORATION

**CHIGNIK LAGOON NATIVE CORPORATION
BOARD OF DIRECTORS**

RESOLUTION 19-3

**SUPPORT OF JOINT RESOLUTION- JUNE 28, 2018
FURTHER CONSERVATION OF CHIGNIK DRAINAGE SOCKEYE STOCKS**

WHEREAS, the Chignik Lagoon Native Corporation ("CLNC") majority shareholders rely on the Chignik area commercial salmon fishery as their main income, in addition the Chignik salmon run supplies the majority of their subsistence needs, and;

WHEREAS, other than the monetary value the Chignik salmon run provides for our shareholders, it is a cultural necessity to the community and lands that CLNC owns in the Chignik Area, and;

WHEREAS, CLNC is a large land owner in the Chignik Area with an obvious concern for its salmon run and what it provides for the five communities, and;

WHEREAS, CLNC voices the same concern for Chignik's second sockeye salmon run that the five tribes of the Chignik area convey in their joint resolution dated June 28, 2018, and;

WHEREAS, the five communities have mapped out a very detailed plan with all the needed information for immediate action to be fulfilled with Governor Walker's assistance, and;

WHEREAS, CLNC in their respect for the communities surrounding the Chignik Area would like to fully support their joint resolution dated June 28, 2018 with all the haste that is possible to follow through with the needed actions within the resolution, and;

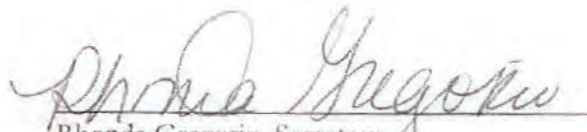
NOW, THEREFORE, BE IT RESOLVED, the Chignik Lagoon Native Corporation supports the five communities in their efforts to conserve and protect the Chignik Sockeye Salmon returns with their submission of joint resolution-June 28, 2018 titled Further Conservation of Chignik Drainage Sockeye Stocks.

CERTIFICATION

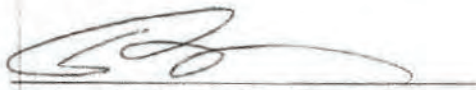
I, Rhonda Gregorio, do hereby certify: that I am the Secretary of Chignik Lagoon Native Corporation, organized and existing under the laws of the State of Alaska; that a regular meeting of the Board of Directors of the above corporation, was duly held on July 3, 2018; that notice of the regular meeting was given to each Member; that a quorum of ~~the~~ Members attended and participated; and that the foregoing resolution was duly adopted.

In witness whereof, I have hereunto set my hand, by order of the Board of Directors of Chignik Lagoon Native Corporation, this 3 day of July, 2018




Rhonda Gregorio, Secretary
Chignik Lagoon Native Corporation

ATTEST:


Rodney Anderson, President
Chignik Lagoon Native Corporation



Chignik Lagoon Native Corporation
PO Box 169
Chignik Lagoon, AK 99565

Commissioner Sam Cotten
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526
VIA email

Re: 2018 Chignik Sockeye Salmon Run

Dear Commissioner,

Chignik Lagoon Native Corporation is the largest land owner at Chignik Lagoon and would like to express our concerns on the current sockeye salmon run crisis that the Chignik area is now facing.

We realize other areas of the state are also coming up short on escapement, please keep in mind Chignik River system is unique. The Chignik area is not as diversified as other communities that have processors throughout the entire year and other species of fish to catch such as pollock. It is our hope to collaborate efforts so that salmon continues to be a valuable resource of the communities of the Chignik area and to the State of Alaska.

As representatives of our shareholders, our board would like to do our very best to communicate our voice of concern.

We have shareholders who depend on this resource for subsistence, culture and income. It's not just a dollar amount that is at stake but a historical centerpiece of Chignik Lagoon. A large percentage of our shareholders rely on salmon and the communities in the Chignik area have placed their faith in the State's Department to preserve and protect it.

We realize the salmon run is complex, It is obvious that there is something very wrong this year but shareholders who have made Chignik Lagoon their home have noticed a deterioration in previous years as well.

Our board would like to propose that a summit be held for our salmon by the state to address all of the issues this year and previous years so that a plan may be put into place by the people of Alaska with the knowledge of the biologists and specialists.



It only makes sense to include the voices of the people who live among the resource and observe their habits each and every year. A plan in place in case of another year such as this would in hopes prevent problems and confusion in the least.

As for this current year our corporation would like to extend their appreciation of the participation the department has put forth so far with the local agencies and governments.

We ask that this close communication continues and every effort of transparency is made to ensure that what is left of this run may be protected.

The escapement observation camera that is awaiting installation at the Chignik weir provides an excellent tool for the locals to observe the run and understand in the decisions being made.

The Chignik Lagoon Native Corporation would like to also reiterate that the commercial salmon fishery in all intercept areas along the migration route of terminal bound fish should be halted before any of the local subsistence is restricted.

It is unfortunate that we are in this situation at all however we look forward to working with the state to help find a solution for healthy salmon runs in the future.

Respectfully,

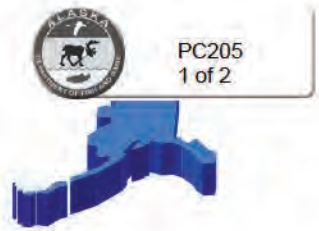
A handwritten signature in blue ink, appearing to read "Rodney Anderson".

Rodney Anderson
Chignik Lagoon Native Corporation President

Cc:

Governor Bill Walker
Lieutenant Governor Byron Mallot
Senator Lyman Hoffman
Representative Bryce Edgmon

Chignik Regional Aquaculture Association
2731 Meridian Street, Suite B
Bellingham, WA 98225



July 2, 2018

Commissioner Sam Cotten
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, Alaska 99518-1565

Subject: Scheduled July 6th Dolgoi Island Area Salmon Fishery --- Conservation Issue

Dear Commissioner Cotten:

Chignik Regional Aquaculture Association (CRAA), which represents all Chignik commercial salmon permit holders, respectfully requests that you exercise Alaska Statutes Title 16 authority and immediately order the Division of Commercial Fisheries not to open the Dolgoi Island Area of the South Alaska Peninsula to commercial salmon fishing on July 6 and beyond until the Chignik early sockeye salmon run achieves minimum escapement. The justification is clear. Such action is required for the conservation of Chignik bound early-run sockeye salmon which has remained well below minimum escapement since early June and founded on the knowledge that the Dolgoi Island Area is a well-established July migration corridor for early and late Chignik sockeye per the Department's three- year WASSIP Investigation (2006-08). In that study for 2006 Chignik sockeye salmon comprised 67.0% of the July or post-June catch, in 2007 37.2%, and in 2008 47.3%. The July Dolgoi Island Area three-year harvest amounted to 50.5% Chignik sockeye salmon.

Currently (6/30/18), Chignik's early sockeye run is 50% below the minimum goal and 56% lower than the midpoint goal which per biologist Jeff Wadle is the Department's management target for the Chignik fishery this season.

We are aware that other sockeye salmon stocks would contribute to a July fishery in the Dolgoi Island Area. However per WASSIP they may well be lesser in magnitude than Chignik sockeye salmon. In the WASSIP years, East of WASSIP fish (Kodiak/Cook Inlet) ranked second averaging 42.6% of the catch and South Peninsula stocks averaged less than 1% of the catch. Obviously a July fishery in the Dolgoi Island Area would impact Chignik bound sockeye salmon especially the early run. In 2006, 35% of the July 6-31 Dolgoi July catch was early run fish followed by 28% late run (WASSIP Appendix E.6).

The Chignik Management Area is presently closed for early-run conservation and has been all season. To permit Dolgoi Island Area to fish beginning July 6th would be a serious injustice to an historic and valuable resource of the State of Alaska. Again, we implore you to close Dolgoi Island Area for the conservation of Chignik bound early-run sockeye salmon.

Most sincerely,

Charles McCallum
Executive Director, CRAA



Chignik Regional Aquaculture Association

2731 Meridian Street, Ste. B; Bellingham, WA 98225

Executive Director, Chuck McCallum (907) 351-9107



June 21, 2018

Nick Sagalkin, Westward Region Supervisor, Fish & Game Coordinator;
Jeff Wadle, Westward Regional Finfish Supervisor, Fishery Biologist IV; and,
Kevin Schaberg, Westward Region Research Supervisor, Fishery Biologist IV
Alaska Department of Fish and Game
351 Research Ct.
Kodiak, AK 99615-6399

Subject: In-Season Analysis of GSI Samples of 2018 Chignik Sockeye Salmon

Chignik Regional Aquaculture Association (CRAA) is highly concerned that Chignik's two sockeye salmon runs will be largely different in magnitude, to the degree that their management will be imprecise without the application of in-season genetic stock identification (GSI) sampling data. As a consequence, CRAA requests that the Department analyze GSI samples in-season to ensure that the Department has the data to define the timing of the two runs as accurately and timely as possible. While CRAA appreciates the Department's effort to model the stock timing of the two Chignik runs from previous years of GSI data, it is obvious that the 2018 Black Lake run is well outside the range of normality, to the extent that a standard stock model will not likely account for its abnormally low abundance or weakness relative to Chignik's expected second run.

CRAA understands there can be some logistical and sampling problems undertaking GSI in Chignik. In consideration, CRAA will gladly provide transportation of the samples from the harvest location through Lake Clark Air to Anchorage. Additionally, in good faith CRAA will provide a seine vessel and crew to assist in the collection of the necessary samples from the Lagoon.

CRAA is very serious that it is important to have GSI results available to the fishery managers for the 2018 Chignik fishery, and therefore again asks that the Department analyze GSI samples in-season for management of the Black Lake and Chignik Lake runs during their overlap period.

CRAA looks forward to providing assistance to the Department for transportation and assistance in collection of the GSI samples and your response to our request.

Sincerely,

Charles McCallum

Executive Director CRAA

cc: Bill Templin, ADF&G Chief Fisheries Scientist
CRAA Board of Directors



CONCERNED AREA M FISHERMEN
35717 Walkabout Road, Homer, Alaska 99603
(907) 235-2631

July 9, 2018

John Jensen, Chairman
Alaska Board of Fisheries
P.O. 25526
Juneau, Alaska 99802-5526

Re: Chignik Emergency Petitions

Dear Mr. Jensen and Board Members:

Concerned Area M Fishermen (CAMF) submits these comments on the emergency petitions you will be considering at a meeting on July 17, which seek to restrict fisheries on the south side of the Alaska Peninsula to reduce interception of Chignik-bound sockeye salmon. CAMF represents the interests of Area M drift gillnet fishermen. Our members participate in both South and North Peninsula fisheries, including the South Unimak and Shumagin Islands June Salmon fishery (the June fishery) and the Post-June fishery.

Our comments will focus on process. The board's petition policy expresses a clear preference for addressing regulatory proposals in its normal meeting process. Emergency petitions are disfavored: "The boards find that petitions can detrimentally circumvent this process and that an adequate and more reasonable opportunity for public participation is provided by regularly scheduled meetings." 5 AAC 96.625(f). The board will be reviewing the management plans for the June and Post-June fisheries at its regularly scheduled meeting in February 2019. Participants in these fisheries have already built their calendars around the timing of this meeting. There is no legitimate reason for the board to schedule an earlier meeting to consider the issues presented by Chignik advocates. The June fishery is over, and the action the petitions request for the Post-June fishery – linking openings prior to July 25 to Chignik escapement goals – will largely be moot by the time the board considers the petitions. The board will have ample time at the February meeting to consider the issues raised by Chignik interests.

CAMF recognizes that sockeye returns to Chignik so far this season have been very poor. But one year of poor returns does not equate to an emergency that warrants the board departing from its regularly scheduled process. Neither of the Chignik sockeye runs has been designated a stock of concern. The board's Sustainable Salmon Policy frames its stock of concern review in terms of a "chronic inability" to maintain escapements or yields, which is defined as an "inability to meet escapement thresholds over a four to five year period, which is approximately the generation time of most salmon species." 5 AAC 39.222(f). One year of abnormally low returns does not meet this definition.



Board of Fisheries

July 9, 2017

Page Two

At the meeting in February, the board will, as always, be presented with extensive reports from the Alaska Department of Fish and Game concerning the salmon fisheries of Area M. These reports – which will require time to prepare – will undoubtedly include a review of what happened this season, in both Area M and Chignik. The public will also certainly weigh in with comments and information for the board's consideration. The board will be able to review all of this information and determine what, if any, revisions to the management plans for the June and Post-June fisheries are warranted. Short-circuiting this normal process risks depriving the board of information necessary to exercise its informed judgment.

CAMF therefore urges the board to reject the Chignik emergency petitions and instead focus its efforts on reviewing the fisheries in Area M at its regularly scheduled meeting next February. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Steve Brown".

Steve Brown
President

Handwritten initials in blue ink, possibly "SB" or "MA".



From: Dale Pedersen
To: [DEG, BOF Comments \(DEG sponsored\)](#)
Subject: Emergency meeting July 17 regarding area M
Date: Monday, July 9, 2018 4:12:04 PM

To board of fish,

If you have the time and internet speed you should read some of the reports concerning black lake habitat destruction and sockeye survival.

It would be the prudent thing to do before anymore fishing gets shut down.

We are up for discussion at the February meeting, we can talk about their problems then.

Thank you,

Dale Pedersen

Sent from my iPad



F/V Calista Marie
P.O. Box 2278
Kodiak AK 99615
(907) 539-6144

July 7, 2018

John Jensen, Chairman
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Emergency Petition on Chignik Sockeye

Dear Chairman Jensen,

I would like to take this opportunity to introduce myself and crew to you and Alaska Board of Fisheries. My name is Dale Pruitt and I have owned and operated a Kodiak Commercial fishing operation for 38 years. Yes, I am a member of the graying fleet. For the last 5 years I have been fortunate to have an all family crew. Having my son, daughter and son-in-law learn the commercial fishing business has brought me great joy. I understand the need to mentor and share fishing knowledge with my adult children so they can be a part of the sustainability the Kodiak Salmon Industry.

It was brought to the attention of the Kodiak Commercial Salmon fleet that the Board of Fisheries has received emergency petitions regarding the low 2018 Chignik Sockeye escapement. These petitions reference both the Kodiak and Area M salmon management areas to stop or reduce Area M and the Kodiak Fishery Interception of Chignik sockeye salmon.

I understand the frustration from the Chignik fleet however, I don't believe reducing the Area M and the Kodiak Fishery Interception of Chignik sockeye salmon solves Chignik's serious situation.

There are 4 Kodiak family households that depend on my salmon fishing abilities. The Kodiak salmon fleet provides business opportunities to families, local business and cannery workers.



The decision to reduce the Kodiak Commercial Salmon fleets ability to harvest salmon in hope to recover the Chignik Salmon disaster does not make good business sense and creates additional hardship for fishing families in Kodiak.

Please consider other options to support the Chignik area fishermen that do not create additional fishing hardships.

Respectfully,

Dale Pruitt, Owner
Mitchell Pruitt, Operations Manager
Calista Pruitt, Business Manager
Cameron Hill, Chief Engineer





From: Dan Grunert
To: [DEG, BOF Comments \(DEG sponsored\)](#)
Subject: Chignik Fishery Comment
Date: Monday, July 9, 2018 4:45:07 PM

I am a 4th generation fisherman in the Chignik area. We are very concerned about our 2018 sockeye escapement and the lack of action taken by ADF&G. I understand that Area M is still fishing and catching about 14% of Chignik bound fish. Is it not all our responsibility to keep our natural resources and fisheries sustainable? Where is Area M responsibility? What is going to happen to our future Chignik Sockeye run? Thank you for your time.

Daniel Grunert
F/V Adventures

Sent from my Samsung Galaxy smartphone.



Submitted By
Danielle Ringer and Christopher Johnson
Submitted On
7/9/2018 12:20:47 PM
Affiliation

Danielle Ringer and Christopher Johnson
PO Box 151
Kodiak, AK 99615

July 7, 2018

Chairman John Jensen
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Chignik Emergency Petitions and BBNA Resolution

Dear Chairman Jensen and Board Members:

My husband and I have a salmon seining operation in Kodiak and have worked our way up from a 25-foot boat jigging to a 38-foot boat where salmon fishing is our bread and butter. Trying to survive on one precarious leg of salmon is already difficult enough without ongoing political efforts to limit our fishing opportunity. We understand that there is natural variability of abundance and we did not expect the 2018 salmon season to be extremely good and yet still we prepared our boat, our gear, and our crew to try to put a season together to support our livelihood. We rely on the sound and sustainable in-season management by the Alaska Department of Fish and Game to adhere to standing regulations while understanding that every season is different and that we must be ready for the ups and downs inherent in fishing ways of life. We do not support BBNA's petition to in any way limit Area M and Kodiak salmon fisheries because of this year's escapement at Chignik and have serious concerns about what kind of precedent this would create.

Additionally, the BBNA petition is causing stress among those who are unable to participate in this process to get letters sent voicing their opposition in July. My husband Christopher is out on the boat right now, as are other hard working fishermen who are struggling with a 2018 season of low salmon abundance in the Gulf of Alaska. While we empathize with Chignik's struggles as fellow fishermen, we believe it is highly inappropriate for the Chignik region to lay blame and try to limit others when salmon numbers throughout the state this year are lower than expected and people are trying to scrape a season together to get by. Area M and Kodiak fishermen have already been limited in order to share responsibility in the burden of conservation for Chignik. Without any fishing time in the Cape Igvak section of the Kodiak District coupled with extremely low sockeye harvests by Kodiak commercial and subsistence fishermen, we cannot see how this petition has merit to move forward nor do we see how it would relieve Chignik's escapement issue.

Instead, we should support each other as fishermen and fishing dependent communities trying to survive during the characteristic cyclical nature of fishing rather than trying to force regulatory change to prioritize one region's well-being over others. The points outlined in BBNA's petition about the economic and cultural importance of salmon are not unique to the Chignik region. We as fishermen all rely on salmon to support our boat, permit, home, and living expenses, our culturally valued food preparation and sharing practices, and our way of life.

Thank you for your consideration and we respectfully urge you to take no action on this petition that would cause severe negative cultural, economic, and environmental consequences for the Kodiak region.

Danielle Ringer and Christopher Johnson
F/V North Star



Submitted By
David Osterback
Submitted On
7/9/2018 4:00:30 PM
Affiliation
Qagan Tayagungin Tribe

Phone
9073835616
Email
QTTAdmin@arctic.net
Address
PO Box 447
Sand Point, Alaska 99661

The Qagan Tayagungin Tribe would like to go on record regarding the emergency petitions coming before the Board of Fish on July 17, 2018 pertaining to the South Peninsula and Area M.

The Qagan Tayagungin Tribe is located in Sand Point, Alaska, on the Shumagin Islands. The Qagan Tayagungin Tribe strongly opposes the consideration of these emergency petitions for a number of reasons.

Our Tribal Members, residents, commercial fishermen and those dependent on the fishery (which is everyone) have expressed deep concern regarding our fishery. We worry about other areas of the state expressing unwarranted venomous opposition to our regions ability to depend on our salmon return for our income and subsistence resource as well.

Like other regions, Sand Point, and other Tribal Communities on the south peninsula depend on our summer salmon season to be able to purchase heating fuel, electricity, gasoline, food, house payments, boat expenses, and financial loan obligations to the State. The heavy restriction of other fisheries, and decline in other fisheries bio-mass have made supplementing family's summer salmon income with them difficult.

The current management plan already provides the Alaska Department of Fish and Game the authority to make adjustments as needed to the South Peninsula fishery, which they have already exercised this summer! Our June fishery was reduced by 25%.

While a complete closure of the South Peninsula fishery will not have a significant impact on the Chignik run, it will most certainly create long lasting devastating damage to South Peninsula. The fishermen, their families, and all the business and communities dependent on this historic salmon fishery will suffer from a loss of this magnitude. The Tribe has seen from previous years of economic stress the detrimental impact this has on the community as a whole, including but not limited to: increases in substance abuse, increases in domestic violence, and increases in other crime. This is not merely an economic issue from the Tribe's perspective, but a community health and well-being issue.

Our region is already scheduled to be discussed during the upcoming meeting cycle at the February 2019 meeting. Given the fact our region is already scheduled to be discussed within the next 7 months, and given all the points we've made above, the Qagan Tayagungin Tribe strongly urges the Board of Fish to deny these emergency petitions.



Far West, Inc.

FURTHER CONSERVATION OF CHIGNIK DRAINAGE SOCKEYE STOCKS

Resolution 2018-07

July 2, 2018

WHEREAS: Community members from the five Chignik area communities (Chignik Bay, Chignik Lagoon, Chignik Lake, Perryville, and Ivanof Bay) solely depend upon the Chignik area commercial salmon fishery as their primary driver economic and cultural survival, income, and subsistence salmon harvest needs; and

WHEREAS: A Joint Tribal Resolution dated June 21, 2018, titled Chignik Sockeye Fishery Disaster Declaration was submitted to Governor Walker to urge the declaration of the Chignik Management Area (CMA) a fishery economic disaster on Chignik's first sockeye run; therefore Chignik's second return of sockeye is of extremely high importance to the Chignik fishery and warrants the upmost protection from intercept fisheries, in particular from the Area M (South AK Peninsula) interception; and

WHEREAS: In consultation with Alaska Department of Fish and Game and the five tribes, the US Fish and Wildlife Service Office of Subsistence Management has issued an Emergency Special Action No. 8-SS-01-18 closing federal public waters of the Chignik River drainage to the harvest of Sockeye Salmon except by federally qualified subsistence users holding a Social and Cultural Harvest permit beginning June 22, 2018; and

WHEREAS: ADF&G issued an Emergency Order No. 4-FS-M-SP-02-18 wherein the commissioner exercised the department's Alaska Title 16 authority reducing harvest opportunity in the Shumagin and South Unimak from two 88 hour periods, to two 40-hour periods, citing conservation concerns for Chignik-bound sockeye salmon in recognition that past studies have shown that significant numbers of Chignik sockeye salmon migrate through the South Peninsula Management Area; and

WHEREAS: ADF&G issued an additional Emergency Order No. 4-FS-M-SP-03-18 where the department reduced the harvest effort in the two 40-hour periods; and

WHEREAS: The use of in-season Genetic Stock Identification Sampling (GSI) has been utilized in management decisions for the past 6 years, but was discontinued in 2018. We urge in-season GSI to resume to distinguish between Black Lake and Chignik Lake runs. The impact of the failed first sockeye salmon return (Black Lake) increases the importance of the second run (Chignik Lake); and

WHEREAS: Chignik-bound sockeye salmon migrate through the Shumagins and selected areas of the South Unimak Area to the degree that accountability for stock conservation and terminal harvest opportunity are required. In accordance, it is important for sustainability and accountability to impose a conservation assignment on Chignik-bound sockeye salmon and a basic harvest preference in the Chignik Management Area fishery but still providing reasonable fishing opportunity in Area M.

NOW THEREFORE BE IT RESOLVED Far West, Inc., the Alaska Native Village Corporation for Chignik Bay created under the Alaska Native Claims Settlement Act, requests Governor Walker urge the commissioner to exercise his authority; consistent with AS 16.05.060. Emergency Orders, and under the guidance of 5 AAC 39.220 (a) Policy for the management of mixed stock salmon fisheries. (a)(b) and 5 AAC 39.222. Policy for the management of sustainable salmon fisheries,



NOW THEREFORE BE IT FURTHER RESOLVED that immediate regulatory action 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 of 600,000 for terminal area fishermen as described in 5 AAC 09.360, for the Chignik Management Area fishery for 2018 and beyond.

A handwritten signature in blue ink, appearing to read "Marit Carlson-Van Dort", written over a horizontal line.

Marit Carlson-Van Dort

Far West Inc., President



4000 Old Seward Highway Suite 201 Anchorage, AK 99503
Phone 907-276-2580 Fax 907-272-2581

June 25, 2018

Commissioner Sam Cotton
Alaska Dept. of Fish & Game
PO Box 115526
Juneau, AK 99811-5526
Via email

Dear Commissioner Cotton,

I am writing on behalf of Far West, Inc. the Alaska Native Village Corporation for Chignik Bay formed under the Alaska Native Claims Settlement Act representing over 500 shareholders from the region. First, I would like to thank you and department staff for participating in the teleconference hosted by the Chignik Fish and Game Advisory Committee last Friday June 22nd. What I heard on during that teleconference was a great deal of concern and fear on behalf of local residents and fishermen and a great deal of vague answers from the department and concessions that there was no defined path forward for managing the dismal and unprecedented lack of fish returning. The fact that Area M was allowed to fish, even just with set nets during the emergency closure, demonstrates to Chignik an unwillingness to prioritize the health of the Black Lake terminal sockeye run over intercept fishery priorities.

Run sustainability and sound management of this resource critical to our area both economically and culturally should be of the utmost importance. While we understand pressure to keep Area M fishing, management practices should be employed to allow only limited southern end Area M (Unimak Pass area) openings to minimize potential Intercept of Chignik bound sockeye until at least such time as Chignik escapement goals are met. Additionally, there needs to be a more robust genetic testing program in order to better understand and delineate first and second run Chignik fish, as well as what percentage of Chignik bound fish are intercepted by Area M. Given the late return of the Black Lake run, we have concerns that without genetic testing late returning first run sockeye will be counted as second run thus putting additional pressures on the viability of the Black Lake run. Finally, we request a more defined process and communication plan for how the department intends to manage and respond to the run failure. How are managers in Kodiak, Chignik, and Area M communicating with each other and the public to determine fishery openings using what escapement goals? What information does the department feel is lacking in order to better understand and manage these fisheries?

Chignik has a long and proud history of salmon fishing. We understand well that the economics of fishing is inherently unpredictable, which makes it all the more important that the biology be

Far West Inc. Board of Directors

Marit Carlson-Van Dort President & CEO, Gene Carlson Vice-President, Claudia Carlson, Secretary/Treasurer
Calvin Skonberg Director, Ashley Monroe Director

FAR WEST INC



PC212
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4000 Old Seward Highway Suite 201 Anchorage, AK 99503
Phone 907-276-2580 Fax 907-272-2581

studied, understood, and respected. I look forward to continued conversations and updated communications on how the department is responding to the Chignik run collapse.

Sincerely,



Marit Carlson-Van Dort
President

Cc: Governor Bill Walker
Lieutenant Governor Byron Mallott
Senator Lyman Hoffman
Representative Bryce Edgmon



From: George Anderson
To: [DEG, BOF Comments \(DEG sponsored\)](#)
Subject: Conservation of Chignik Sockeye Salmon Runs
Date: Monday, July 9, 2018 4:56:49 PM

July 9, 2018

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811-5526

Subject: Emergency Petition for Conservation of Chignik Sockeye Salmon Runs

Dear Chairman and Board Members:

I am George Anderson, a lifetime Chignik fisherman from Chignik Lagoon. I serve as a board member for Chignik Regional Aquaculture Association, Chignik Lagoon Native Corporation, and our Regional Planning Team.

My goal is to ensure conservation, protection of customary and traditional subsistence uses, and sustained economic health of Alaska's fishing communities.

With the failure of the Chignik's early-run and below escapement goal numbers currently on the late run, it is most unlikely that the Chignik systems will approach their sustainable escapement requirements, let alone meet subsistence needs or provide a commercial sockeye fishery other than in Area M in 2018.

As you are well aware, safeguards have been wisely in place in the Igvak and Southeast District Mainland fisheries through July 25 to ensure conservation of the Chignik sockeye salmon. Because studies have shown that Chignik-bound sockeye salmon are a major component in the post-June fishery in the Shumagins and the South Unimak Area it is time and equitable that these fisheries share a conservation responsibility too on Chignik sockeye salmon. Respectfully I ask that the BOF do what is right and correct an inequity by curtailing the Shumagin Island and South Unimak fisheries through July 25 or until the two Chignik runs meet escapement requirements.

Sincerely,

George Anderson

PO Box 168
Chignik Lagoon, AK 99565

Tel: 907 830-2623



From: Henry Erickson
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Cc: [Keoki AAAA](#)
Subject: Concerned Chignik Fisherman.
Date: Monday, July 9, 2018 9:46:09 PM

To whom it may concerned:

I am a commercial fisherman and permit holder in Chignik and I am deeply distressed by what I am seeing with the sockeye salmon run in Chignik. I learned how to fish from my father (Clarence "Bobby" Erickson) was running a boat here since 1953. He had been telling me since 2004 that due to the lack of escapement and the decisions of the board of fish to allow Area M to intercept our fish unchecked there was going to be a catastrophic failure, it appears that that is now the case!

I still have not figured out when it is time to panic and do something about this situation. Why has something not been done about this? Not only are we destined to not reach our escapement goal but it appears that there will not be enough escapement to secure our future runs.

There needs to be some checks on Area M and there harvesting and intercepting of the terminal runs in the state of Alaska, not just in Chignik but all areas affected. I don't care how much money and political power Area M has, turning a blind eye to the things that are happening is criminal and is not helping anyone, including Area M! Once the runs they poach off of are gone so is there fishery.

Sincerely,
Henry Erickson
242 Beach Blvd.
Chignik Lagoon, Alaska
99565



JACK FOSTER JR
P O BOX 254
SAND POINT, ALASKA 99661
PH 907-383-3633

July 9, 2018

TO: Board of Fish
Chairman John Jensen
Board Member Orville Huntington
Board Member Reed Morisky
Board Member Alan Cain
Board Member Israel Payton
Board Member Robert Ruffner
Board Member Fritz Johnson
Executive Director Glen Haight

SUBJECT: Emergency Petitions put forth on Area M fishermen – comments

I am a 48 year fishermen – local – running a family operation here in Area M.

The Board of Fish should deny further restrictions to Area M or any emergency actions. Chignik has already crippled the South East District Mainland (SEDM) fishery by securing a large “guaranteed” catch of early run fish combined with a rather ambitious escapement goal, which has had expected consequences for the SEDM, that is a fishery which has been in existence as long as Chigniks, but, shut down, while Chignik has been increasingly turned into a Cape Fishery. Maybe the board ought instead to look at the Chignik Management plan, which is rather big changed from the Lagoon fishery it used to be, and it’s been a recent change in its own areas, which I believe has had more impact than anything new in Area M.

We already have Board of Fish meetings coming up in February this upcoming year.

Fish and Game has currently cut our June fishery by 25% by Emergency Order on a predominately west bound run, to a questionable benefit to Chignik. We have already lost most of our July fishery for questionable benefits to Chignik’s fishery. Further restrictions in our area just puts undo burden of more conservation on the backs of fishermen, processors, communities and Area M.

As a seine permit holder and set net permit holder I certainly object to the premise that any fish in any area belongs to the people of the said area, rather Fish and Game is managing a State Recourse, which previous boards recognized and distributed as allocated as such.



I believe that the Board and Fish and Game is discriminating against the fishermen of this area by considering any knee jerk reactions to area closures that have questionable benefits to Chignik, but has a predictable negative impact on the people of this area.

I am asking the Board of fish to deny these emergency petitions to restrict our fishery, the South Peninsula Salmon fishery at this time.

Sincerely,

Jack R. Foster Jr.

Jack Foster Jr.



Submitted By
Jason Wiley
Submitted On
7/9/2018 11:33:53 AM
Affiliation
7 Mile Fishing
Phone
4802854446
Email
jascoyote@hotmail.com
Address
PO box 101
larsen bay, Alaska 99624

Chairman Jensen and members of the Alaska Board of Fisheries,

My name is Jason Wiley, I am a second generation fisherman from Kodiak and I am concerned over the recent emergency petition to limit salmon fishing in Kodiak. I am a permit holder and the primary operator of 7-Mile set net out of Uyak bay, a small family operation established in 1976. We depend on sustainable management of our fisheries resources and we believe the current tools utilized by ADF&G management address concerns in Chignik and other areas and no further action is necessary.

We do not agree with emergency meetings taking place concerning our livelihood in the middle of the season. Having a salmon meeting at the peak of the salmon season in Anchorage is bad for public policy.

Like all wild species, salmon experience natural up and down cycles in run strength and timing. Our managers have the tools to be able to properly manage for these fluctuations and should not be micro managed mid season. Please let the managers do their jobs and take no action.

Sincerely,

Jason Wiley

7-Mile Seafoods

Box 101 Larsen Bay, AK 99624

jascoyote@hotmail.com



Kelsin Orloff
PO Box 37
Chignik, AK 99564

Attn: Board of Fish Members

Dear Board of Fish,

My name is Kelsin I am 15 years old, and I have been fishing for nine years. I am extremely concerned about the future of the Chignik salmon fisheries. The past few years have made a huge turn for the worse for our salmon escapement. This leads me to believe that the Alaska Dept. of Fish and Game is not capable of managing the Chignik Salmon run efficiently. I think that Area L should NOT be under Kodiaks Management. If this fishery continues to go downhill, it could lead to devastation for many people. This idea of a future without salmon concerns me so much that my school class mates and I made a poster to show facts of the mismanagement of the Alaska Dept. of Fish and Game. Another thing is that no matter how much you allow Kodiak and Sandpoint to intercept our fish, it's not only affecting Chignik fishermen it also will affect them later on. These fish need to come to Chignik in order to repopulate. I am hoping that there will be salmon in the future so that this industry will still be around when I am ready to be a captain.

Thank you for your time,

Kelsin Orloff

F/V Patti Ann



Submitted By
Ken Christiansen
Submitted On
7/9/2018 4:47:53 PM
Affiliation
fisherman

Phone
907-486-4323
Email
4christiansen@qci.net
Address
1849 Marmot Drive
Kodiak, Alaska 99615

My name is Ken Christiansen. I am a lifelong Kodiak salmon fisherman. I have owned and operated a seine vessel in Kodiak waters for 40 years. My comments today are in reference to the emergency petitions regarding the Chignik area salmon fishery.

Although I empathize with those Chignik Area salmon permit holders who are being affected by this season's poor returns, I do not believe that closing the Kodiak Management Area would be an effective tool for helping the situation.

It is known that the Cape Igvak Section of the Kodiak Management Area is managed in such a way as to protect the Chignik salmon run. Kodiak fisherman have not fished the Cape Igvak Section this year because the escapement goals have not been met for Chignik. Further, studies in the fairly recent past have shown that few Chignik bound fish have actually been caught in Kodiak Area waters so closing the Kodiak Management Area would not help the Chignik run.

Also, I believe that closing Kodiak Area waters creates greater harm. Most of the Chignik caught salmon are tendered to Kodiak for processing. If Kodiak Area waters are closed then there will be no salmon for the local plants to process and no work for the processing employees who are already suffering reduced hours due to the poor run.

It seems to be a difficult year for salmon fishermen throughout the state, I can understand why the emergency petitions have been submitted in hope of helping the Chignik fishermen, however I honestly don't believe that closing other fishing that does not directly affect the Chignik run would be a prudent decision.

Thank you for allowing me to comment.



Kodiak Salmon Work Group
c/o Kodiak Regional Aquaculture Association
104 Center Ave., Suite 205
Kodiak, Alaska 99615



PC219
1 of 2

July 9, 2018

Chairman John Jensen, Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Chignik Emergency Petition and BBNA Resolution regarding Chignik salmon run.

Dear Chairman Jensen and Board Members:

The Kodiak Salmon Work Group (KSWG) is an ad hoc committee created by salmon industry stakeholders to assess regulatory aspects of the Kodiak Management Area's salmon management. In short, we stand behind Kodiak's salmon management plans as scientifically valid, historically verified and equitably implemented.

The Alaska Board of Fisheries has recently announced an unusual July meeting to address emergency petitions on two topics -- Hatchery Permitting and Chignik Sockeye Run Failure. KSWG opposes changes to Kodiak's salmon management plans based on the Bristol Bay Native Association's request for emergency relief. The Kodiak area's Cape Igvak Management plan has a conservation burden written into it, as noted in the Chignik advisory committee petition, and there is no need for changing or altering the plan.

Chignik's sockeye run failure is unfortunate. So too are the sockeye run failures in Kodiak, Prince William Sound and, perhaps, Cook Inlet. It would appear that the unusually warm ocean water temperatures in 2015 and 2016 impacted the ocean survival of sockeye from all Gulf of Alaska sockeye systems, including Chignik. Chignik's emergency "run failure" is therefore not unique but symptomatic of larger oceanographic conditions common to Gulf of Alaska sockeye runs.

While the magnitude of the "failure" appears to be marginally more severe in Chignik, the overall lack of 2018 wild run sockeye in the Gulf of Alaska contextualizes the Chignik concerns. The Alaska Board of Fisheries should therefore address this as an area-wide issue rather than focus on the Chignik system --- one that has had rearing issues with the early run in Black Lake for several decades.

The key question, therefore, is how should the Alaska Board of Fisheries address the "emergency" sockeye run failures throughout the Gulf of Alaska? Kodiak Salmon Workgroup suggests that the best approach is recognition of the natural variability of wild stocks as well as the limitations of regulatory solutions for natural variability. In other words, humbly accept that there are things beyond our control and TAKE NO ACTION.



Very truly yours,

A handwritten signature in blue ink that reads "Duncan Fields".

Duncan Fields, Chairman



Office of the Mayor and City Council

710 Mill Bay Road, Room 220, Kodiak, Alaska 99615

July 9, 2018

Chairman John Jensen, Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

dfg.bof.comments@alaska.gov

RE: Chignik Emergency Petition and BBNA Resolution regarding Chignik salmon run

Dear Chairman Jensen and Board Members:

On behalf of the City of Kodiak, its residents, salmon fishermen and processors, I would like to comment on the Chignik emergency petitions and the BBNA resolution calling for changes to Kodiak's salmon management plans.

While we certainly appreciate the ramifications of a major run failure and the potential impacts on the viability of coastal communities who rely primarily on salmon for subsistence and their livelihood, we oppose any changes to Kodiak's current salmon management plans. The emergency petition process is specified under 5 AAC 96.625 and references rare instances where circumstances may require regulatory changes outside of the normal meeting cycle. Alaska AS 44.62.270 indicates that emergencies will be held to a minimum and are rarely found to exist.

We have two points of concern pertaining to any potential action or response by the Board of Fish to this emergency petition. First, the timing of this special meeting and the short notice will significantly hamper public participation and the public process. The majority of Kodiak's salmon fishermen will be engaged in their respective salmon fishing activities during this meeting and will have little or no opportunity to participate or comment in what should be a very transparent and inclusive State process.

Secondly, the State's fisheries management plans have provisions to limit or close fishing in the Cape Igvak area. Therefore, there are no conservation gains to further restricting Kodiak's fishermen in the Igvak harvesting area.

Like Chignik, Kodiak has experienced a drastic reduction in sockeye production for 2018 and harvesters, processors and processing workers have all been seriously impacted. Kodiak businesses and both municipal governments rely on salmon harvesting to support our community. We have already experienced a devastating reduction in the federal quota for Pacific cod with a corresponding impact to our economy. Further restrictions placed on Kodiak's salmon management plan that are not thoroughly vetted through a full Board of Fish public and transparent process would have a lasting detrimental impact on our community.

We respectfully urge you to take no action at the July 17 meeting.

A handwritten signature in cursive script that reads "Pat Branson".

Pat Branson, Mayor
City of Kodiak

July 6, 2018

John Jensen, Chairman
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Emergency Petitions on Chignik Sockeye

Dear Chairman Jensen,

Koniag is a regional Alaska Native Corporation formed under the terms of the Alaska Native Claims Settlement Act of 1971. Koniag has approximately 4,000 Alutiiq Shareholders. Our region encompasses the Kodiak Archipelago in the Gulf of Alaska and a portion of the Alaska Peninsula. The communities in our region have traditionally been dependent on fisheries resources for subsistence and commercial purposes for centuries. Koniag has been working diligently on issues affecting the viability and sustainability of the village communities of the Kodiak Archipelago and access to fisheries is a critical component of this effort.

It has come to our attention that the Board of Fisheries has received emergency petitions regarding the historically low 2018 Chignik Sockeye escapement. These petitions reference both the Kodiak and Area M salmon management areas and one, from Bristol Bay Native Association, specifically, "...requests the Alaska Board of Fisheries holds an emergency meeting as soon as possible for regulations to stop or reduce Area M and the Kodiak Fishery Interception of Chignik sockeye salmon."

Koniag opposes any request from other fishery management areas to stop or reduce salmon fisheries within the Kodiak salmon management area. While we recognize the disastrous season in Chignik this year and sympathize with its commercial fishermen and subsistence users, the board must recognize that restricting or shutting down Kodiak fisheries in 2018 will not alleviate Chignik's issue. Kodiak fishermen are fishing local waters targeting Kodiak river system fish this year. The Cape Igvak section of the Kodiak management area has not been opened due to conservation concerns with the Chignik return. In addition, it should be noted that Kodiak sockeye harvest is below historic averages in 2018 and two river systems that are critical to subsistence harvest for residents of Kodiak, Ouzinkie, and Port Lions (Litnik and Buskin) have also been closed to subsistence harvest due to low returns of sockeye.

This proposal will completely disrupt the Kodiak area fishery, causing significant economic harm to its fishermen, processors and communities while not alleviating Chignik's issue. Moreover, the request does not consider the fact that shutting down fisheries in the Kodiak management area could cause

koniag.com

P (907) 561-2668

F (907) 562-5258



over-escapement into local systems causing harm to local runs therefore creating another disaster in the Kodiak salmon management area on the heels of the disastrous 2016 pink salmon season in Kodiak.

Koniag supports the effort for an economic disaster declaration for Chignik, however, Koniag does not support restricting or closing the Kodiak salmon management area due to the poor sockeye returns to Chignik in 2018. Again, our hearts go out to the commercial and subsistence users in the Chignik area. We are hopeful that the Board of Fish and Governor will identify solutions to assist them in their time of need. I simply ask that your solution does not create harm to the Koniag region.

Sincerely,

Shauna Hegna
President



LAKE AND PENINSULA BOROUGH

RESOLUTION 18-15

A Resolution Calling for Immediate Action to Conserve Chignik-Bound Sockeye Salmon in the South Peninsula Area Fisheries

WHEREAS, the Black Lake and Chignik Lake sockeye spawning and fishing grounds, along with the five communities of the Chignik area (Chignik, Chignik Lagoon, Chignik Lake, Perryville, and Ivanof Bay), are located within the jurisdiction of the Lake and Peninsula Borough; and,

WHEREAS, all five Native communities of the Chignik area are culturally and economically highly dependent on Black Lake (early run) and Chignik Lake (late run) sockeye salmon; and,

WHEREAS, the current regulations for the South Peninsula Fisheries (except South East District Mainland (SEDM)) do not provide for any sharing of the conservation burden for Chignik-bound sockeye stocks; and,

WHEREAS, the early run, the larger of the two Chignik sockeye runs, has failed to meet even minimum escapement since the start of the run in early June. And whereas on July 7 the early-run escapement is a few percentage points above half of the lower escapement objective (52%) as prescribed by the Department of Fish and Game; and,

WHEREAS, while the strength of the Chignik Lake (late run) sockeye run is uncertain on this date, the second run is currently below minimum escapement; and,

WHEREAS, the Department is on record stating that Chignik's early-run must reach the mid-point of its escapement objective or the late run sockeye exceed its upper escapement goal objective before a commercial fishery on Chignik sockeye salmon in the Chignik Management Area will be considered prior to August 1; and,

WHEREAS, ADF&G's Western Alaska Salmon Stock Identification Program (WASSIP) of 2006-08 verified that the South Peninsula Area fisheries harvest both early and late run Chignik-bound sockeye salmon through at least July 25th; and,

WHEREAS, despite these proofs the Department has not restricted the Post June Fishery in the South Unimak east of the Unimak District, including the Dolgoi Island Area and the Shumagin Island Area fisheries, which began on July 6 and which will further cause escapement deficiencies on early-run Chignik sockeye salmon; and,



WHEREAS, the South Unimak east of the Unimak District (except SEDM), including the Dolgoi Island Area and the Shumagin Island Area fisheries, are currently managed by area and time only and are not by regulation assigned any stock conservation responsibility pertaining to escapement of migrating sockeye salmon including fish bound for Chignik and elsewhere; and,

WHEREAS, all State of Alaska fisheries, including historic interception fisheries, have inherently a basic responsibility to ensure stock conservation including resource sustainability; and,

WHEREAS, the Borough has received an emergency petition from the Bristol Bay Native Association and a second emergency petition from the Chignik Advisory Committee along with numerous letters and resolutions from the tribes and stakeholders of Chignik area pleading for responsible action by the Commissioner of Fish and Game and the Board of Fisheries to ensure that Chignik-bound sockeye salmon are not exploited to where a basic level of stock conservation namely minimum escapement is forgone because of Area M fishing; and,

NOW THEREFORE, BE IT RESOLVED that the Lake and Peninsula Borough supports the Bristol Bay Native Association Emergency Petition, the Chignik Advisory Emergency Petition, and the Joint Chignik Tribes Resolution 2018-02; and,

FURTHERMORE, be it resolved that the Alaska Board of Fisheries is hereby respectfully requested to immediately respond to the identified emergency conservation issues by closing and/or limiting substantially all South Peninsula salmon fishing in non-terminal areas east of the Unimak District until Chignik-bound sockeye salmon have reached or exceeded minimum escapement or through July 25th whichever occurs first.

PASSED AND APPROVED by a duly constituted quorum of the Lake and Peninsula Borough Assembly this 9th day of July 2018.

IN WITNESS THERETO:

Glen R. Alsworth, Sr., Mayor

Kate Conley, Borough Clerk



Submitted By
Mark Beardsley
Submitted On
7/8/2018 1:21:16 PM
Affiliation

Phone
907-401-0015
Email
wild_ak_salmon@yahoo.com
Address
PO Box 8776
Kodiak, Alaska 99615

Dear Board Members,

I believe the Chignik Emergency petition and concerns should not be considered at this time and will be better served during the regular Board cycle and when the 2018 season is over. The timing of this petition is not appropriate as most of the Kodiak fleet is unable to respond as they busy on their boats, at setnet camps, or away from available resources and technology to respond. It seems premature to make a drastic adjustment to the Kodiak Management Area when another area is experiencing low returns, in the middle of a statewide season and things are not over for the 2018 season. Management plans have been refined over many years and set in place for stability in all areas.

Just because Chignik is have a slow sockeye year does not justify altering the Kodiak Area Management plan. We are also experiecing a historically slow salmon season here in Kodiak. Fishermen have fished waters around Kodiak Island for decades while being managed by Fish and Game. Additionally, Kodiak salmon fisherman are already sharing in the conservation of Chignik bound sockeye within the Kodiak Area Management plan by restricting seine fleet effort on the Mainland when numbers are low in Chignik. I am not sure how the Area M management plan is written regarding fishing limitations when Chignik returns are low? This could be a possible area of research and again should be dealt with during the regular Board cycle when all stakeholders are available for input.

Best Regards,

Mark Beardsley, Kodiak setnetter



Submitted By
Matthew Alward
Submitted On
7/9/2018 1:29:42 PM
Affiliation
commercial fishermen

Phone
907-299-2933
Email
matt@bulletproofnets.com
Address
60082 Clarice Way
Homer, Alaska 99603

I oppose the BBNA emergency petition to restrict fishing in the Area M and Kodiak Management areas to protect the Chignik sockeye run.

I have raised my family and put them through collage seining in the Kodiak fishery and our livelihood depends on the opportunity to harvest local Kodiak salmon.

The Kodiak Management Area (KMA) is managed on local stocks expect for the allocative management plan of the Cape Igvak section. The genetic study that was recently conducted shows that the Cape Igvak section is the only place in the KMA that has harvest of Chignik bound fish and it has been closed all season. Fish and Game has the full authority to restrict or close fishing to protect stocks and is already taking such action in Area M and KMA to protect Chignik bound fish.

What this petition really is about is a long-standing allocation battle between Bristol Bay, Area M, Chignik, and Kodiak and to take up allocation issues in a short notice emergency meeting during the fishing season not only inappropriate but abusive of the public process.

Again, under current regulations the Department of Fish and Game already has the authority to restrict or close fisheries for conservation of stocks and is using that authority. Since the department already has the authority to do what the emergency petition is asking for I feel that the Board of Fisheries should take no action on this petition. To take action on an allocative petition during the fishing season and out of cycle would in my opinion be an abuse of Board of Fisheries authority and of the public trust.

Sincerely,

Matthew Alward

Owner-Alward Fisheries LLC



FV Temptation, INC
PO Box 33
Sand Point, Alaska 99661
907-383-2262

In regards to the emergency petitions to the Alaska Board Of Fish, that seek to further restrict or Close the South Peninsula salmon fisheries:

- I. Chignik and Area M are already scheduled to come before the Board of Fish in the regularly scheduled meetings in February. With the amount of time left in the Area M fishery it will not help increase the Chignik stock.
- II. The Shumagin Island fishermen fish for Salmon going west and have very little impact on Chignik bound salmon. The impact is 1.6% on Black Lake and 6% in July on Chignik Lake.
- III. Area M has already had 70 miles of coast line between McGinity's and Kupreanof closed to help salmon pass to meet Chignik escapement and harvest goals.
- IV. My grandfather, my father and I have fished the Shumagin capes for salmon west bound to Bristol Bay over 100 years. My permit was issued to fish these capes.
- V. The "department" has the power to shut down the fishery. They did and we lost 25% of our June fishery.
- VI. There is not enough fishing time in July with the % of fish going to Chignik to further restrict Area M's fishery. Again, 70 miles of fishing area is closed to pass fish by.
- VII. More restrictions will be devastating to Area M with little help to Chignik Area.
- VIII. Last year the Chignik fishermen's harvest was over 6 million pinks bound for Area M, most of the Chignik fishermen made their season on these salmon as they were passing through.
- IX. The value of a Chignik seine permit would buy 3 Area M permits or 6 Kodiak permits.

Respectful submitted by
Melvin and Marilyn Larsen
PO Box 33
Sand Point, AK 99661



Submitted By
Michael Webb
Submitted On
7/9/2018 4:10:26 PM
Affiliation
Seafood Processor

Dear Chaiman Jensen and Board Members;

I am the Plant Manager of the Icicle Seafoods Cannery and Operations located in Larsen Bay Alaska. I have been continuously in the Alaskan Fishing Industry for the past 37 years, personally participated as a Fisherman or in Plant Management throughout the State. This covering many species of fisheries from the Yukon River, Bering Sea, Bristol Bay, Gulf Of Alaska, Southeast and others.

I oppose to the Kenai River Sportfishing Association(KRSA), the Bristol Bay Native Association(BBNA) and the Chignik Advisory Committee petitions and request that the board deny them.

My concern is that the previously mentioned Associations and/or Committees are usurping public comment. Especially putting these petitions out at at time when most of us involved in the Salmon Fisheries across the state are busy. Many people affected by this normally scheduled and typically transparent process.

The Kodiak Area Management Plan has always addressed concerns to limit the interception of of Chignik Bound Sockeye. Cape Igvak Section is predicated on Chignik Area Harvest to ignore this is to ignore years of scientific data and proven management practices.

These petition should not be considered as they do no qualify under "Emergency" provisions.

Thank You for consideration of my concerns.

Michael Webb



Dear Sir or Madam,

My name is Nathan McArthur and I am a teacher in Chignik Bay, AK. My wife and I saved money and still went into debt to move to AK to become teachers in Chignik. Due to the fishing crisis in our region I am writing to request Emergency aid relief to be considered for the Chignik region. I also request the ADF+G change policy to be more fair and equitable with regard to the Chignik - Kodiak Disparity. In the past 11 years Kodiak area has made \$63,000,000 more than the Chignik area. That is just in fish sales there is always more benefits that come with that level of disparity between two regions. Please consider the people who live in the Chignik region over the next few months. The ADF+G needs to ensure the fisheries in the Chignik region survive to preserve a culture that has been devastated by their mismanagement of the resources. Please begin to make this right soon. No time like the present.

Sincerely and with conviction.

Nathan McArthur



Submitted By
Nathaniel Rose
Submitted On
7/9/2018 4:58:31 PM
Affiliation
Kodiak Seiners Association

Kodiak Seiners Association

PO Box 8835

Kodiak, AK 99615

07/09/2018

Chairman John Jensen
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Chignik Emergency Petition and BBNA Resolution

Dear Chairman Jensen and Board Members:

The Kodiak Seiners Association (KSA) is an advocacy group comprised of 84 active Kodiak salmon permit holding members. Our membership is representative of a number of coastal communities including Kodiak, Homer, Old Harbor, Ouzinkie, Port Lions, Karluk, Larsen Bay, and Akhiok. Our membership stands behind the complex yet equitable Kodiak Salmon Management Plan as one based in sound science and established history.

This letter is to express concern for the emergency petition filed by Bristol Bay Native Association to stop or reduce interception of Chignik bound fish in the Kodiak and Area M management areas. In a year where numerous Gulf of Alaska sockeye producing systems (Copper River, Chignik, Buskin, Litnik, Pasagshak, Saltery are failing or barely making escapement goals set by ADFG, it is emotional and rash for BBNA to point fingers towards Kodiak and Area M as the responsible parties, and attempt to halt fishing in a season with well-below average escapements and harvests, Gulf-Wide.

A closer look at the sockeye genetic study completed by ADFG in 2016 shows that during the years 2014, 2015, and 2016 the only Kodiak salmon district with intercept (>3%) of Chignik bound sockeye is the Cape Igvak section of the mainland district. The burden of conservation for the Chignik run failure has fallen on Kodiak fisherman as the Cape Igvak section of the Kodiak management area has remained closed during the historical openers in this section in June.

We recognize the frustration and empathize with the fisherman of Chignik, and understand that for the coastal communities of the Chignik district, the summer salmon season is an economic engine that helps those communities make it through the long winters, however we would point out that the Kodiak salmon fishery is currently experiencing the lowest harvests on records in over 40 years. The failure of the Chignik systems is the result of an environmental problem, not one of intercept by other districts. Resorting to in-season attempts at re-allocation will not solve the anomalies from the 2016 pink salmon disaster or the 2018 sockeye salmon disaster in the Gulf of Alaska.



We urge the board to refrain from taking action on this petition, as it is difficult for stakeholders to be involved in the scrape together a remainder of a season.

Sincerely,

Nate Rose

Kodiak Seiners Association

President



1600 A STREET, SUITE 101
ANCHORAGE, AK 99501

FORTIER & MIKKO
A PROFESSIONAL CORPORATION
Attorneys at Law

SAMUEL J. FORTIER
DAGMAR C. MIKKO

TELEPHONE: (907) 277-4222
FAX LINE: (907) 277-4221

June 25, 2018

Commissioner Sam Cotten
AK Dept. of Fish & Game
P.O. Box 115526
Juneau, AK 99811-5526


Hazel Nelson, Director Subsistence Division
AK Dept. of Fish & Game
333 Raspberry Rd.
Anchorage, AK 99518-1599

Dear Commissioner Cotten and Ms. Nelson:

I am attaching an updated signed letter regarding the Chignik fishery. Chignik Lagoon has today submitted its signature page. Accordingly, the letter mailed to you on June 22 now includes Chignik Lagoon.

Very truly yours,

FORTIER & MIKKO, P.C.



Samuel J. Fortier

SJF:mah

Enclosure



OCEANSIDE CORPORATION
P.O. Box 84
Perryville, AK 99648

June 21, 2018

Commissioner Sam Cotten
AK Dept. of Fish & Game
P.O. Box 115526
Juneau, AK 99811-5526

Hazel Nelson, Director Subsistence Division
AK Dept. of Fish & Game
333 Raspberry Rd.
Anchorage, AK 99518-1599

Dear Commissioner Cotten and Ms. Nelson:

This letter is submitted to you on behalf of Oceanside Corporation, the Native Village Corporation for the village of Perryville, and the Native Village of Perryville. Our people rely upon the salmon resource for our lives, our cultures, and our economies. As you are aware, Chignik's first sockeye run (Black Lake) has not materialized. The minimum escapement goal is 350,000 by June 30. The minimum escapement objective for June 20 is 150,000 and the current escapement is 14,717 (through June 19) – less than 10% of the minimum needed for this date.

The collapse of the early run is being exacerbated by the Area M intercept fisheries and we note that the Department has begun to address this issue with fishery restrictions in the South Peninsula of Area M (Sand Point Fishery Announcement #5, June 18, 4:30 pm). The justification was finally released on June 20. However, we also note that no department guidance has been provided to our communities or our fishing fleet regarding potential subsistence closures in Chignik. The reason for this letter is to address the very real need of timely communications from the Alaska Department of Fish & Game to communicate with our communities, as well as our local and non-local commercial fishermen who are shut down and on the beach.

The reality, today, is that there is growing pressure from the Chignik commercial fleet on subsistence fishermen to voluntarily cease subsistence harvesting until the escapement goal is met. Our subsistence fishermen, on the other hand, should not be placed in a position that requires us to forego a way of life based upon inadequate communication.



Commissioner Sam Cotton
Ms. Hazel Nelson
June 21, 2018
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For this reason, we are requesting that Fish & Game communicate with our Chignik community, both subsistence and commercial fishermen. In particular, we need to know what criteria the department is using to decide when the subsistence fishery may be shut down. What kinds of closures might be considered? Certain areas or gear types only? Bag limits? Time limitations?

We believe that the entire South Peninsula, possibly excepting South Unimak, should be completely closed before subsistence restrictions in Chignik are imposed. These restrictions should remain in place until minimum escapement goals are achieved, or very nearly achieved, or the first run is no longer vulnerable to the area M intercept harvest. This information needs to be promptly provided to both the subsistence and the commercial fishery communities in the Chignik area.

We understand that, historically, the average subsistence take is 5,000-10,000 fish on an annual basis for the five Chignik villages. That subsistence use is essential to our people's well-being. We do not believe that voluntary stand downs from subsistence fishing is a wise course of action, although we certainly share the commitment to sacrificing for the future of the runs that we are all so dependent upon. In the absence of adequate and timely information from the Department some of our commercial fisherman have made the step of announcing their individual, non-binding commitments to not participate in the subsistence fishery. We are, therefore, requesting that you communicate precisely under what conditions the escapement failure reaches such a critical point the department would restrict or close Chignik subsistence fisheries, so that our people and our commercial fishermen can be fully informed when they consider voluntary subsistence stand downs.

Very truly yours,

OCEANSIDE CORPORATION


Patrick Kosbruk, President

NATIVE VILLAGE OF PERRYVILLE


Gerald Kosbruk, President



Commissioner Sam Cotton
Ms. Hazel Nelson
June 21, 2018
Page 3 of 3

NATIVE VILLAGE OF CHIGNIK BAY

A handwritten signature in cursive script that reads "Roderick E. Carlson".

Roderick Carlson, President



Commissioner Sam Cotton
Ms. Hazel Nelson
June 21, 2018
Page 3 of 3

NATIVE VILLAGE OF CHIGNIK BAY

Roderick Carlson, President

FAR WEST, INC.

A large, stylized handwritten signature in black ink, appearing to read "Marit Carlson-Van Dort".

Marit Carlson-Van Dort, President



Commissioner Sam Cotton
Ms. Hazel Nelson
June 21, 2018
Page 3 of 3

NATIVE VILLAGE OF CHIGNIK BAY

Roderick Carlson, President

FAR WEST, INC.

Marit Carlson-Van Dort, President

CHIGNIK LAGOON VILLAGE COUNCIL



Jeremy Anderson, President

July 9, 2018

Alaska Board of Fisheries
Chairman John Jensen
PO Box 115526
Juneau, Alaska 99811-5526
Email: dfg.bof.comments@alaska.gov

Re: Chignik Emergency Petition and BBNA Resolution regarding Chignik Salmon Run

Dear Chairman Jensen,

Old Harbor Native Corporation (OHNC) is one of 252 Native village corporations established by Congress in 1971 under the terms of the Alaska Native Claims Settlement Act (ANCSA). OHNC was incorporated in 1973 and originally enrolled 329 shareholders under the Act. Today, there are 434 shareholders residing primarily in Anchorage, Kodiak and Old Harbor. The Old Harbor Native Corporation has a fisheries committee on which I serve as Chairman. Our mission is to protect and expand the fisheries based economy of the community of Old Harbor in the east side of Kodiak Island.

The village of Old Harbor relies on the salmon commercial fisheries as our main economic base. 80% of our community's families rely on the salmon season to support them throughout the year. It is critical that our fisherman have the opportunity to provide for their families.

We have been notified of the emergency petitions regarding the low 2018 Chignik Sockeye escapement. They have requested that the Alaska Board of Fisheries hold an emergency meeting for regulations to stop or reduce Area M and the Kodiak Fisheries Interceptions of the Chignik sockeye salmon.

Old Harbor Native Corporation opposes any request from other management areas to stop or reduce salmon fisheries within the Kodiak management area. Although we understand there is a devastating season in Chignik this year, the Board of Fisheries must know that closing the Kodiak fisheries in will not fix the issue. Our local commercial fisherman are also struggling to make a season this year due to the low Kodiak sockeye harvest.

We absolutely oppose this proposal as it will devastate our community and all the families that rely on this resource. The economic harm of closing the Kodiak area fishery will not only hurt our local fisherman but also the processors and entire communities across the Island. Thank you for your time and consideration of our comments. Please contact our office if you have any questions or concerns.

Truly yours,



Freddie Christiansen, Chairman
Old Harbor Fisheries Committee



PSPA

PACIFIC SEAFOOD PROCESSORS ASSOCIATION

Est. 1914

July 9, 2018

Alaska Board of Fisheries
John Jensen, Chair
Via email dfg.bof.comments@alaska.gov

RE: Emergency Petitions on Chignik Sockeye Fishery

Chairman Jensen and Board Members:

Thank you for the opportunity to comment on two emergency petitions before the Alaska Board of Fisheries (board) on July 17. The BBNA petition requests in part that the board take action to further regulate the Area M and Kodiak sockeye salmon fisheries to prevent interception with the Chignik sockeye fishery. The Chignik Advisory Committee petition, not available to the public for comment until five days before the comment deadline, asks for an emergency finding and new regulations to restrict commercial fishing in the South Peninsula of Area M. **PSPA opposes both emergency petitions and requests that the board deny the petition requests.**

PSPA is a nonprofit seafood trade association representing 9 seafood processing businesses and their investment in coastal Alaska, including several shorebased processors in Kodiak, King Cove, Sand Point, False Pass, and Port Moller¹ that serve the Kodiak and Area M salmon fleets, as well as Chignik. These salmon fisheries are essential to and directly benefit harvesters, processors, support businesses, and communities in the region. Salmon fisheries comprise about 32% of the total ex-vessel value of fisheries landed in the Kodiak Island Borough, and sockeye fisheries are a critical component, at \$17.7m in ex-vessel value in 2017. In the Alaska Peninsula, the Area M salmon fishery supports primarily local families from the fishing villages of False Pass, Nelson Lagoon, King Cove, and Sand Point, with North and South Alaska Peninsula sockeye ex-vessel value of about \$22.2m and \$18.6m in 2017, respectively.²

PSPA does not support the petitions for emergency action to further regulate the Area M and Kodiak salmon fisheries. While it is critically important for the Chignik sockeye run to be sustained into the future, there are no specifics provided in the petitions on the timing of potential action, the impact relative to that timing, and a rationale for further action beyond what is already accommodated for in the current management plan. Due to the emergency request, it is assumed that the timing of any

¹The Peter Pan shoreplant in Port Moller is being rebuilt due to fire, so salmon normally processed in Port Moller are being processed in other AEB communities in 2018.

²2017 Alaska commercial salmon harvests and ex-vessel value, preliminary 2017 data (10/13/17), ADFG.



action could only be post-July 17 of this year. The Commissioner has already taken unprecedented inseason action to restrict the Area M salmon fisheries in June. Overall, the intent of the action proposed and the timing of the request does not have a clear conservation benefit to Chignik in 2018 beyond what is already provided for in the current management plans.

Relative to Kodiak management, the management plan is currently structured such that the Cape Igvak section openings are triggered by Chignik area harvest, so if Chignik fishing is closed, there is also a closure at Igvak and thus little possibility for Kodiak area interception. The board should recognize that its Kodiak area management plan is currently structured to be conservative and protect the Chignik fishery.

The Alaska Peninsula management plans, developed using decades of experience, restrict area, timing, type of gear, and units of gear with the overall intent to prosecute a fishery relatively remote from other fisheries with small amounts of gear. In particular, the South Peninsula is governed by three ADFG management plans: 1) the Southeast District Mainland (SEDM) Management Plan; 2) the June South Alaska Peninsula Salmon Management Plan and 3) the Post-June South Alaska Peninsula Management Plan. The SEDM area is managed separately from the South Unimak and Shumagin areas and is based on the strength of the Chignik run; the strength of the Orzinski run (a local sockeye run within the SEDM); and abundance of local coho, pink and chum stocks. From June through July 25, the SEDM is allocated 7.6% of the total Chignik Management Area (CMA) sockeye salmon harvest.

Chignik factors into the June and Post-June South Alaska Peninsula Management plans relative to a small, but productive subarea called Dolgoi. In February 2016, the board made changes to these two management plans to limit the number of sockeye (191,000 fish) harvested in the Dolgoi areas during the June 1 – July 25 timeframe. If 191,000 are caught during that timeframe, the areas close through July 25. The board specifically referenced WASSIP impact rates in making this decision.

Overall, the WASSIP studies (2006 – 2008)³ show relatively small impacts on early run Chignik fish, and do not justify the unprecedented action ADFG took in closing the entire South Alaska Peninsula for 25% of the June 2018 fishery nor do they justify further regulated closures or restrictions in the South Alaska Peninsula fishery. The Aleutians East Borough has provided an analysis using WASSIP data indicating the restrictions already taken would not have had a meaningful effect on the low first run of sockeye in Chignik in the latter part of June (attached). A review of WASSIP for post-June fisheries produces similar results. Data from the harvest and harvest rate report show that relative to the early run, with the possible exception of one year in the Dolgoi area, impacts are very small (0.0% to 2.4%)(Appendix F64-66, p. 731-733). It is made clear in the report that evaluating harvest rates is important; one cannot use WASSIP results in a way that equates stock proportions alone with impact rate on a particular fishery. The harvest rate report was undertaken because 'extension of those proportions to stock specific numbers of fish harvested, and calculation of stock specific harvest rates in the fishery was the appropriate way to evaluate those impacts' (p. 5).

³Stock composition of sockeye salmon harvests, WASSIP (2006 – 2008); ADFG Special Publication 12-22. Harvest and harvest rates of sockeye salmon stocks, WASSIP (2006 – 2008); ADFG Special Publication 12-24.



In sum, the board should recognize the quantitative assessments of impact rate supported by WASSIP, which indicate that very few Chignik salmon would be conserved by implementing restrictions in these areas during this timeframe, and balance these with the significant negative impacts on fisheries and communities associated with further restrictions in the Alaska Peninsula. Communities like Kodiak, King Cove, and Sand Point were built around commercial fisheries in the late 1800s, and it remains the primary economic engine in these regions. Recent studies show community dependence on the salmon fisheries and overall fisheries landing taxes is significant:⁴

- The city of **King Cove** has about 925 local residents (July 2017 census) supported by local fisheries. Local fish taxes represented 60% of the community's operating revenue in 2016
- Peter Pan Seafoods in King Cove provides jobs for about 500 workers during the summer
- Vessels delivering salmon to Peter Pan include 34 seiners, 120 drift boats, and 20 setnet boats
- The city of **Sand Point** has about 915 residents (July 2017 census) supported by local fisheries. Local fish taxes represented 33% of the community's general fund revenue in 2016
- Trident Seafoods in **Sand Point and False Pass** provides jobs for about 500 workers during the summer
- Vessels delivering salmon to Trident Seafoods include 25 seiners, 60 to 80 drift boats, and 35 set net boats
- **Aleutians East Borough** generated 45% (\$4.2m) of its total general fund revenue from fish taxes in 2016
- About 27% of the **Kodiak Island Borough's** working age population of approximately 9,500 residents earns income directly from the seafood industry (1,269 residents earned income from commercial fishing and 1,290 residents were employed by seafood processors in 2014)
- In the Kodiak Island Borough in 2014, 187 permit holders participated in the seine fishery and 149 permit holders in the setnet fishery, the majority of which were borough residents

Since the petitions have been filed, the cumulative Chignik weir counts for sockeye salmon are over 172,000 fish as of July 4. We are extremely hopeful that the second run at Chignik produces better escapement, and potentially, harvest opportunity. We also recognize that wild stock fisheries have significant annual fluctuations, and that not all fluctuations meet the criteria for an emergency. The Chignik sockeye fishery is not identified by ADFG or the board as a stock of concern – and should that ever be the case, there is a department process to develop action plans with recommended management measures in response.

In sum, state policy (AS 44.62.270) dictates that emergencies will be held to a minimum and are rarely found to exist. PSPA requests that the board not take emergency action to further regulate the Area M salmon fisheries when the data indicate little to no conservation benefit to Chignik, especially given the timing of any action, and when most affected harvesters and processors cannot participate in the Board of Fisheries meeting in a meaningful way due to the ongoing salmon season. Low escapement during the early run does not warrant bypassing the normal public process. No proposals should be considered or

⁴AEB community tax revenue statistics are from: Economic Impact of Inshore Seafood Processing in the Bering Sea/Aleutian Islands Region, McDowell Group, May 2018.

Kodiak Island Borough statistics are from: Economic Impact of the Seafood Industry on the Kodiak Island Borough, McDowell Group, May 2016.



generated at this meeting given the inability to receive necessary public input and the lack of sufficient public notice on the second petition. The board has already scheduled Alaska Peninsula/Aleutian Island/Chignik Finfish issues for February 2019, which is the appropriate time to review the current management plan for these fisheries and would allow for adequate public process.

Please deny these emergency petitions. Thank you for your consideration and your public service.

Signed,

President



June 20, 2018

Commissioner Sam Cotten
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, AK 99518


Commissioner Cotten,

The recent emergency management action taken by ADFG to restrict fishing on the South Peninsula was designed to address a failing first Chignik sockeye run. However, data from the WASSIP study suggests that very few Chignik fish will be conserved by restrictions proposed in some areas.

The table below shows numbers of Chignik fish harvested in each of four South Peninsula areas in the last third of June (Appendix D1-D3)¹ and the Chignik run size, for 2006, 2007, and 2008 (Tables 3-5)². The figures are derived by multiplying estimated harvest numbers for each district in the last part of June, by the mean Chignik stock proportion in that fishery period for that year. If one divides that Chignik harvest number by the Chignik run size, the result is a harvest rate estimate for that fishery location and period on Chignik fish. In Shumagin, Unimak, and Ikatan, the harvest rate on Chignik fish is 1% or less for June 20-30. This means that for a Chignik run of 100,000, roughly 1,000 might be saved if no fishing occurred in these areas. In Unimak and Ikatan, the harvest rate is more like 0.5%, saving less than 500 fish.

(numbers in thousands)	2006	Chignik Harvest Rate	2007	Chignik Harvest Rate	2008	Chignik Harvest Rate
Chignik Run size	2,300		1,650		1,500	
Shumagin catch of Chignik sockeye	18.1	0.008	14.3	0.009	17.0	0.011
Dolgoi catch of Chignik sockeye	88.1	0.04	8.8	0.005	6.77	0.005
Ikatan catch of Chignik sockeye	4.0	0.002	0.85	0.001	3.84	0.003
Unimak catch of Chignik sockeye	-	-	0.79	0.000	4.9	0.003

We suggest that the department adopt a more targeted and meaningful strategy that still provides some positive impact on the Chignik run, by restricting the Dolgoi area only. We know from the WASSIP study that a higher proportion of Chignik fish is harvested here. Clearly, actions in Unimak and Ikatan, will provide little impact on the troubled Chignik run. This would help alleviate substantial negative impacts on coastal communities of the South Peninsula.

Sincerely,  on behalf of Mayor Alvin D. Osterback
Alvin D. Osterback, Mayor

¹ Stock Composition of Sockeye Salmon Harvests (WASSIP), 2006-2008. ADFG Special Publication No. 12-22

² Harvest and Harvest Rates of Sockeye Salmon Stocks (WASSIP), 2006-2008. ADFG Special Publication No. 12-24



Submitted By
Patrick Brown
Submitted On
7/9/2018 10:19:28 PM
Affiliation
Area M fisherman

7/9/18

Dear Chairman Jensen and the Board of Fisheries,

My name is Patrick Brown and I am an Area M fisherman and Sand Point resident. I am writing this letter in response to the petitions by the Bristol Bay Native Association and the Chignik Advisory Committee, to shut down the salmon fishery on the Alaska Peninsula (Area M) and enact new regulations, out of cycle. It's been very disconcerting to see that our fisheries are once again under attack out of cycle and we are with limited ability to defend ourselves. As you are well aware, the fighting between Area M and the areas of Chignik and Bristol Bay has a long history.

Currently, the salmon fisheries across the state are showing weak and possibly even later returns than normal. There is nothing we can do to fight Mother Nature in this. Fish don't follow calendars, and run timing is relative to environmental factors. The best we can do is hope and pray that the fish will make a late showing and fulfill all our needs.

When you look at the harvest rates of Chignik-bound stocks through Area M, you will see that the numbers are historically quite low (WASSIP). Coupled with our own local stocks, you see that our fishery is quite multi-faceted and inclusive of all species of salmon. Our area is large, and often hard to manage because of how spread out our stocks are. What we have developed over time is a fishing schedule that accommodates fishing opportunity, as well as windows that allow the passage of migrating mixed-stocks.

Many restrictions have been placed on our fishery over the years and we have lost a lot of our historical fishing grounds. Our fishery waxes and wanes just as the Chignik area does, sometimes seeing devastatingly low runs as Chignik fisheries, see historical highs. The opportunities we lose are often never regained. This season, we have already lost 96 hours of our own fishing time with no hope of ever regaining. Did the CMA make gains as a result? The outcome is negligible. What is certain, however, is the loss of fishing opportunity here in Area M.

The salmon fishery in our area is similarly a primary income for most of our fleet. The majority of the fleet is laid up between the end of September until the commencement of our fishery on June 7. Despite the popular notion, there are a lot fewer opportunities for supplemental fisheries as one might be led to believe. We, too, rely on subsistence to meet our needs. There have been many years where our post-July fishery has been curtailed to allow the passage of late-run sockeye through to Chignik. This has been irrespective of our local pink and chum stocks. We have been forced to sacrifice countless times and our fishery has been marginalized, but many will lead you to believe that we have never had to sacrificed anything.

The Chignik AC is asking for us to be managed under a plan which asks for a guaranteed catch of 300,000 and 600,000 for the early and late runs, and to tie us exclusively to their harvests. They also note that the SEDM and Cape Igvak sections are sharing the burden of conservation. What they don't mention is the allocations in those areas, which are drops in the pot compared to what they are allowed to catch (7.6% and 15%). They want us to share the burden of conservation, but they don't wish to share the bounty. Furthermore, they allude to the exclusive ownership of a resource which is not actually meant to be solely owned by any one entity, according to the Alaska State Constitution. Regardless of what harvest rates were in the particular dates noted, the Chignik fishermen harvested the lion's share of the resource. It should also be noted where the samples for the WASSIP study were conducted and how those numbers are being extrapolated over a large area of the Alaska Peninsula.

The Chignik AC states that they are a terminal stock fishery. However, much of the harvest has been occurring outside of the terminal areas described in recent years. More boats than ever are fishing the capes outside of the terminal areas, therefore effectively making them an expanding intercept fishery. In 2017, they harvested record amounts of pinks, despite having low amounts of their own stocks, and on the shoulders of record returns in the Alaska Peninsula. The CMA historically has had small runs of local pink and chum salmon stocks, yet no mention of the interception of west-bound (Area M) stocks.

We are already in anticipation of the upcoming BOF meeting this winter, to which we will have to visit the possibility of further restrictions in our area from proposals from other areas which aim to curtail our fishery. It seems every cycle, we are met with more opposition and more restrictions. The term compromise is increasingly meant to mean that we give something up while the CMA gains something.

There are many factors to consider here, and it seems that we should all have an equal say in the matter and a stage to voice our opinions equally. The options set forth in the petitions before you are not inclusive of all available data, and are of an extreme bias. I am firmly opposed to the petitions set forth and believe the matter should be taken up in-cycle at our scheduled meeting, when all stake holders are available to attend.

Thank you for your time and consideration in these matters.

Sincerely,

Patrick Brown



Submitted By
Pauloff Harbor Tribe
Submitted On
7/9/2018 4:38:18 PM
Affiliation

Comments on Emergency Petitions:

The Pauloff Harbor Tribe would like to go on record regarding the emergency petitions coming before the Board of Fish on July 17, 2018 pertaining to the South Peninsula and Area M.

The Pauloff Harbor Tribe is a tribe located in Sand Point, Alaska, on the Shumagin Islands. The Pauloff Harbor Tribe strongly opposes the consideration of these emergency petitions for the following reasons:

1. We worry about other areas of the state expressing unwarranted opposition to our region's ability to depend on our salmon return for our income and subsistence resource.
2. Like other regions, Sand Point, and other Tribal Communities on the south peninsula depend on our summer salmon season to be able to purchase heating fuel, electricity, gasoline, food, house payments, boat expenses, financial loan obligations to the State, etc. Heavy restrictions on our fisheries have made supplementing a family's summer salmon income difficult.
3. The current management plan already provides the Alaska Department of Fish and Game the authority to make adjustments as needed to the South Peninsula fishery, which they have already exercised this summer! Our June fishery was reduced by 25%.
4. While a complete closure of the South Peninsula fishery will not have a significant impact on the Chignik run, it will most certainly create long lasting devastating damage to South Peninsula. The fishermen, their families, and all the business and communities dependent on this historic salmon fishery will suffer from a loss of this magnitude. The Tribe has seen from previous years of economic stress the detrimental impact this has on the community as a whole, including but not limited to: increases in substance abuse, increases in domestic violence, and increases in other crime. This is not merely an economic issue from the Tribe's perspective, but a community health and well-being issue.
5. Our region is already scheduled to be discussed during the upcoming meeting cycle at the February 2019 meeting.

Since our region is already scheduled to be discussed within the next 7 months, and given all the points we've made above, the Pauloff Harbor Tribe strongly urges the Board of Fish to deny these emergency petitions.

July 9, 2018

Boards Support Section

P.O. Box 115526

Juneau, AK

To Whom It May Concern

Located in Settlers Cove, 19 air miles west of Kodiak, the Native Village of Port Lions is home to about 200 residents. Our community is one that incorporates the traditional Alaska Native way of life along with innovations of the 21st century, a community where everyone is respected and neighbors help neighbors.

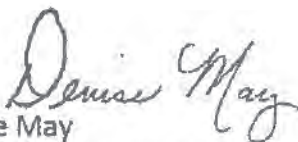
Fisheries sustained the village for hundreds of years, providing food, cultural characteristics and tools for the people.

Kodiak has already been restricted to allow passage of Chignik Fish through NO fishing time in the Cape Igvak section of the Kodiak District. The genetic study completed during the years 2014, 2015, and 2016 showed Kodiak fishermen harvest Chignik fish in the Cape Igvak section alone, and without fishing Cape Igvak section this year, and the lowest west side catches in the last 40 years, it is highly unlikely Kodiak fisherman have harvested any Chignik bound fish.

The Native village of Port Lions agreed with the concerns of the low return of Red Salmon not only in Chignik, but in the Gulf of Alaska as well. Two of our major rivers have been shut down because of lack of fish. Our cultural camp had to adjust from traditionally preserving Red Salmon to King Salmon because of the lack of Sockeye available. If the Board of Fish is going to address this crisis, you need to look at all of the areas that are having low returns.

Thank you for your time.

Sincerely,



Denise May

Tribal Council President



Submitted By
Raechel Allen
Submitted On
7/8/2018 12:12:08 AM
Affiliation

7/7/2018

To the Board of Fish:

Greetings. My family and I own and operate a seiner in Chignik. We wait at home, listening to weir reports, hoping our crew will stay; knowing that like us, they have made no income. We are in shock. Many times, in the near past, we have waited while our escapement lagged by 5 to 10 thousand. This time it is different.

Chignik early run has failed to return. Chignik community members have sensed this weakening for many years. I believe this to be in part from the interception of circulating stocks in the Shumagins and Dolgoi areas.

While all the reasons maybe unknown as to why the Chignik escapement is approximately at half of the lower end to date for what is considered sustainable, it is a fact that other interception areas share in the bounty of this resource. Yet, in this time of crisis, those interception areas are not inclined to share the burden of conservation.

I ask you to act now to protect the sustainability of the Chignik salmon runs for future benefit of all user groups by enacting regulation that promotes sharing the burden of conservation. Minimum harvest ties, windows of no gear in the water, closures of fishing areas near to the border of Chignik, and closures of fishing areas with high percentages of Chignik bound sockeye are possible solutions in areas of interception.

In Chignik, our fishery is closely tied to the strength of the run. Since the nineties, the upper end of the Chignik Lagoon has frequently been easily closed to aid in escapement management. Our areas are also frequently and easily closed to fishing to conserve the escapement. The fishery in Chignik can't do more to conserve salmon than not fish as is the case now. The interception fisheries must contribute help now.

If escapement suffers, the run will be further weakened and become even more difficult to recover to healthy levels in the future. I believe the years of warnings and requests to the Board from the communities of Chignik have been reviewed with so much caution that Chignik is now experiencing the effects of too little, too late.

Please create conservation measures that will allow the Department of Fish and Game to easily manage in interception areas to protect Chignik stocks and also recognize the Chignik fishery as necessary to the community of Chignik. Thank you for your consideration.

Sincerely,

Raechel Allen



Submitted By
Renee Alward
Submitted On
7/8/2018 4:26:13 PM
Affiliation

Phone
907-299-3358

Email
renee@bulletproofnets.com

Address
60082 Clarice Way
Homer, Alaska 99603

I oppose any request from other fisheries management areas to stop or reduce salmon fisheries within the Kodiak management area. Kodiak management is focused on local stocks, and Fish & Game are already doing everything they can to protect Chignik. This emergency petition will not help Chignik's issue, will harm the Kodiak fishery, and could create another disaster in the Kodiak salmon management area.



July 9, 2018

Dear Board of Fish,

Taking up the issue of area M intercepting area Ls' failed run in an emergency session mid-season acknowledges a problem that we in Chignik have continued to bring before the Board since the current management plan was put in place in 2004. Having fishing gear in the water 24 hours a day 7 days a week with no conservation burden is an unrealistic way to manage a fishery. During an informational meeting with Chignik fishermen in early June of this year, the area biologist, Dawn Wilborn, made it very clear that if we were given fishing time in the inner bays to target pinks and dogs but caught any reds the department would immediately move the lines or close the area. We applaud this attitude of the department and ask that it could be applied to area M. While I appreciate the work the Board did putting a cap on the number of fish allowed to be caught in the Dolgoi area during July, the Department, in 2017 allowed this cap to be grossly exceeded by giving the area M fleet 48 hours when they were within a few thousand fish of the cap. This was while Chignik sat idle waiting for escapement.

In conclusion, please put some kind of conservation responsibility on area M.

Sincerely,

Roger Rowland



Submitted By
Ron & Julie Kavanaugh
Submitted On
7/9/2018 5:03:48 PM
Affiliation

Phone
907-486-5061

Email
sylstar@acsalaska.net

Address
1533 sawmill circle
Kodiak, Alaska 99615

Emergency Petitions re Salmon Management for Chignik, Kodiak, and South Peninsula

Chairman Jensen, We are aware that the Chignik 2018 salmon escapement has failed to meet it's projected number. Chignik's red salmon escapement is below 200,000 fish as of July 9th 2018 and This number is approxiamately half last years total to date. Kodiak area's salmon management plan lays out in regulation that it's Mainland and Wide Bay districts will remain closed when a minimum escapement of 600,000 reds is not expected to be reached. This has effectively prevented Kodiak from fishing in these two districts that historically produce Chignik bound salmon. Kodiak salmon fishermen understand the importance of ensuring minimum escapements to all Alaska's anadrominous streams, but we are not in support of emergency orders that are likely to adversely affect the management of another area. It is likely to cause economic hardship to Kodiak fishers with no actual known benefit or measurable difference to Chignik's runs. Kodiak catches 0-2.8% of Chigniks run and will see only a minute amount of that with the Kodiak's Mainland District closed. There is no compelling evidence that further restrictions on Kodiak' Salmon management will benefit Chignik's 2018 salmon escapement. Chignik's and BBNA emergency petitions do not spell out requested language for regulation change, and Kodiak stakeholders are therefore unable to comment to any specific changes at this time. We are asking the Board of Fish to deny any change to the Kodiak Area Management plan at their July 17th 2018 Emergency Petition meeting.

Ron & Julie Kavanaugh



Submitted By
Steven Roth
Submitted On
7/9/2018 1:23:11 PM
Affiliation

July 6, 2018

Chairman John Jensen
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Chignik Emergency Petitions & BBNA Resolution

My name is Steve Roth, I am a Kodiak salmon fisherman and so are my two sons, Richard and William, also vessel owners. Our respective families, crew, and vessels rely on sustainable fisheries management by the Alaska Department of Fish & Game (ADF&G) for our livelihoods and ability to contribute to our coastal community. We respect standing regulations and the success they have provided, understanding that with all maritime resources, there are times of abundance and times of low abundance. We cannot support this petition and ask that the Board carefully consider the precedent being set if the petition is validated.

This petition causes great concern due to its timing during the summer when many stakeholders are unable to participate in the public process, thus bypassing a vital component in responsible fisheries management. Instead, a single region is taking the opportunity to petition for arbitrary regulatory changes while most have no opportunity to speak to this petition, if they even know about it considering the reality of limited communication and internet access while at sea. Chignik does not stand alone in this 2018 season. Most regions around the state have had very low returns and very little fishing time. Significantly, Kodiak has not been opened in Igvak, and Commissioner Cotten has imposed strict emergency measures on Area M, as all three regions have shared responsibly in the burden of conservation for Chignik. The current regulations provide the tools for ADF&G to do their jobs. Instead of prioritizing one region of harvesters over another, let's allow ADF&G to manage responsibly with our support.

Thank you for your careful consideration, we urge you to please **take no action**,

With respect,

Steve Roth, F/V Sea Grace
Richard Roth, F/V Kelly Girl
William Roth, F/V Sea Chantey



Submitted By
Tiffany Jackson
Submitted On
7/9/2018 4:43:17 PM
Affiliation

Phone
9073838433
Email
lilaleut@arctic.net
Address
54 Johnson Ave
Sand Point, Alaska 99661

My name is Tiffany Jackson, I'm a lifelong resident of Sand Point. I'm from a fishing family, and commercial fished for 19 years myself. I've raised my children to be fishermen. My eldest has been going on the boat fishing with his dad and papa since he was 4, and is the middle of his 14th salmon season this year. There is no other way to describe my son than to say fishing is in his blood. Since he was 18 months old, he was 'practice' fishing in the yard. At 13, he was taking breaks from his fishing job with his papa, to go subsistence fishing for his extended family.

It's clear to me that fishing is not just what we do, it is who we are. I didn't raise this boy telling him over and over again 'you will be a fisherman', I raised him emphasizing the need get a quality education, and telling him he can be whatever he wants. His DNA is what's told him he will be a fisherman. This year, having just graduated from high school in May, he's decided he wants to go to school to major in Marine Biology. He's expressed he recognizes the need to be educated in this field, to help protect the life and culture he's grown up in.

I'd like to go on record urging the board of fish to deny the two emergency petitions asking to further limit or close the southern peninsula fishery. We have already faced so many restrictions and closures compared to when I was an active fisherman. We spend more time closed than open in July. My concern is, if you further restrict us, how will I feed my family, how will we keep our house warm, how will I get this child the education in marine biology he so desperately needs to help our region continue our current practice of responsible and sustainable fishing?

My entire life I feel like our region has been the target of vicious attacks by other regions, saying they need to protect their tribal ways and economies. I'm a tribal citizen, my children are tribal citizens, and my husband is a tribal citizen. As Aleut people, we've fished these waters for thousands of years. Fishing is as much as part of our life and culture as it is for any other tribal person in the state, our home is the ocean. Our ability to sustain our livelihoods depends on our ability to harvest salmon, both for income and subsistence.

My husband used to fish most of the year. Now, due to the heavy restriction of other fisheries, he fishes primarily for salmon in the summer. He jigs cod starting in January, but with price of cod the past few years; this has been a very hard, labor intensive fishery, with a small return. We're one of the lucky families. I work full time, and my salary pays our mortgage, electricity, phone bill, and insurance. However, we do depend on what my husband makes to put food on the table, and heat our house, and now, with our eldest going to school, helping with his tuition.

The current management plan already provides the Alaska Department of Fish and Game the authority to make adjustments as needed to the South Peninsula fishery, which they have already exercised this summer when our June fishery was reduced by 25%. While a complete closure of the South Peninsula fishery will not have a significant impact on the Chignik run, it will most certainly create long lasting devastating damage to South Peninsula. The fishermen, my husband and children included, other fishing families, and all the business and communities dependent on this historic salmon fishery will suffer from a loss of this magnitude.

My current job is with the Qagan Tayagungin Tribe of Sand Point. In my roll with the Tribe I've functioned as the Tribal Court Clerk, Finance Director, and currently serve as the Executive Director. In all my different rolls with the tribe, I've always served as the grant writer. As grant writer, I've seen data over the years in regards to crime, juvenile delinquency, and the need for social programs including the Food Distribution Program on Indian Reservations (FDPIR). As the economic health of the community declined, crime increased and at one point we were the largest FDPIR program in the state, though currently, I believe we're the second largest FDPIR program in state. When fishing is better, the general health of the community is better. When fishing is poor, crime increase, and people need more social services. I fear to imagine what our community will be like if fishing is restricted any more, or god forbid, closed.

Our region is already scheduled to be discussed during the upcoming meeting cycle at the February 2019 meeting. Please, deny these emergency petitions at this time. Don't sacrifice our region and our lives for minimal impacts on another region.



Submitted By
Timothy Murphy
Submitted On
6/28/2018 12:49:38 PM
Affiliation

To the chairman and members of the State of Alaska Board of Fisheries; I write to the emergency petition submitted by BBNA on behalf of the communities of the Chignik region, as well as the commercial fishers there, myself being one.

For the 2nd time in 4 years, our historical June fishery has been landed in the nets of intercept fisheries, and our escapement is at an all time record low, we will not even meet lower level escapement goals for June. ADFG in the South Alaska Peninsula has taken a measure by reducing fishing time from 88 to 40 hours for all salmon gear types to try to allow Chignik bound stocks to make it into the CMA for escapement reasons. It is appreciated but it is not enough.

In the 2013 South Alaska Peninsula/ Chignik Board of Fisheries conference the Chignik contingent submitted and were present to support proposals to create effective regulatory language to allow much needed Chignik bound stocks make it through the South Alaska Peninsula into the CMA.

The Chignik contingent referenced the WASSIP genetic study, showing in worst case scenarios the South Alaska Peninsula harvest enormous portions of the Chignik sockeye returns.

A sitting member of the board during the 2013 South Alaska Peninsula/Chignik cycle meeting was quoted as saying "This information is too new to do anything with", that same board member during the 2016 cycle meeting stated that WASSIP was too dated.

Which is it? Too new or too old? Either works to ignore a multi million dollar scientific study apparently.

In 2018 it has come to fruition that an intercept fishery's right to harvest is a higher priority than trying to meet lower level escapement goals for the resource its intercepting, nevermind the absolute loss of harvest opportunity in 2018 for those in Chignik and more than likely when the return from 2018 will return. The term historical fishery and the protection it affords seems to only apply to those intercepting other peoples only resource.

It is June 28th, 2018, our total ESTIMATED escapement of mainly small male sockeye broke the 100,000 mark today.

Being completely realistic, I will most likely not be able to make the payments on my State loan and will more than likely lose my boat and permit to the State of Alaska.

The resource that once and couldve maintained the Chignik region has been split up and used to prop up other areas that have so much other harvest opportunity and so many other fisheries and allowed what could be an economically stable region crumble.

You have let us down.

Sincerely,

Timothy Murphy



UNGA TRIBAL COUNCIL

P.O. Box 508
Sand Point, Alaska 99661

(907) 383-2415 / 5553 Facsimile
ungatribe@arctic.net

July 8, 2018

Boards Support Section
P. O. Box 115526
Juneau, Alaska 99811-5526

Subject: Emergency Petition – Salmon Emergency Regulations

Dear Chairman John Jensen:

The Unga Tribal Council (Native Village of Unga), a federally recognized Aleut Tribe is appalled, concerned and dismayed about the emergency petitions being put forth on Area M fishermen and we are asking that the board deny these emergency petitions to restrict South Peninsula Salmon fishing at this time.

No other area in the state has witnessed or been constantly under attack from others. Whenever fish are missing from AYK, Bristol Bay and the Chignik Area automatically we Eastern Aleuts are to blame for fishing in Area M. This energy needs to stop; because it is unfair to us living here and is and will create hardships on our people and communities if these emergency regulations come into place and are adopted.

For many fishermen record low volumes of fish have been caught, many boats and crew members haven't made any money with many having a deficit account at the processing facilities this fishing season. Numbers are low with fish deliveries in the Shumagin Islands and other areas. Some areas such as the South East District Mainland are closed to fishing due to factors that are out of our control. Unfortunately low salmon runs are occurring throughout the Gulf of Alaska this year. Why such low numbers of salmon being caught? More than likely it is environmental conditions playing a factor in our marine ecosystem, NOT SOUTH PENINSULA FISHERMEN.

Area M and Chignik have proposals in for our fishery that are in place and the issues from these proposals are going to be discussed during the upcoming Board of Fisheries meeting in February 2019. This meeting is on a three year meeting cycle and the foregoing emergency petitions or any other issues related to our fisheries should be brought up at that time not when others deem it is necessary.



ADFG already has emergency order authority and has currently exercised that authority last month in June when they reduced our fishing time by 25%. Our July fishery as it stands currently is closed nearly twice as much as it is open as stated in the current management plan.

In essence an all-out closure of the South Peninsula fishery will not significantly help improve the Chignik run, but it will do lasting, severe damage to South Peninsula fishermen, processors, communities and this historic salmon fishery.

The unfortunate low salmon runs are occurring throughout the Gulf of Alaska this year, and are likely caused by other factors, not fishermen fishing in the waters off the Southern Peninsula. The Area M fishermen do not and never have had a high impact on Chignik bound sockeye stocks. The ocean is big and vast and our fishermen's nets are only in tiny small places for a few short hours with miles upon miles of no (ZERO, none) nets in the ocean creating no impact on Chignik nor other areas of the State of Alaska.

Also of note is that the Chignik area is not an exclusive terminal stock fishery as stated in 5 AAC15.357, fishermen in this area also fish on the capes several hundred miles away from the Chignik drainage system deeming this area also as an intercept fishery. Biologists at Chignik state that the early run escapement by 2 ocean age fish is of substandard quality which may have an impact on the Chignik bound sockeye salmon. Several factors are playing a role in the Chignik salmon fishery, circumstances that should not be utilized in putting the blame on other fishery areas, such as Area M.

Real lives are at stake here and closures to the South Peninsula fishery will not help the Chignik Stock, it will do lasting damage to fishermen, processors and communities that depend upon this historic salmon fishery. We ask the board to take a careful look at the whole picture and deny the emergency petitions that are being brought forth to the board on July 17, 2018 affecting the South Peninsula Salmon Fishery.

Sincerely,

John Foster
President

- | | | |
|-----|--------------------|---|
| CC: | Orville Huntington | Board Member |
| | Reed Morisky | Board Member |
| | Alan Cain | Board Member |
| | Israel Payton | Board Member |
| | Robert Ruffner | Board Member |
| | Fritz Johnson | Board Member |
| | Glen Haight | Executive Director, Alaska Board of Fisheries |

United Chignik Salmon Fishermen

P.O. Box 21
Chignik, Alaska 99561



PC243
1 of 2



July 9, 2018

Alaska Board of Fisheries
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Honorable Chairman and Board Members:

Subject: Emergency Petition Pertaining to Chignik Sockeye Salmon Conservation

United Chignik Salmon Fishermen are highly concerned that the Chignik early and late sockeye salmon runs are being managed ineffectively. Authorities well know that the early run is 50% below minimum escapement and the late run is showing weakness, and its escapement is less than minimum as of yesterday (7/8/18.) Surprisingly immediately west of Chignik in Area M, post-June fishing is ongoing absent of any regard for addressing Chignik escapement problems. The WASSIP study clearly identifies that both Chignik runs are quite vulnerable to exploitation in Area M fisheries especially in the Shumagins and Dolgoi Island areas through at least July 25.

Chignik fishermen recognize that the Shumagin fishery, in particular, has a long history of intercepting Chignik early and late-run sockeye salmon. Sharing of the wealth is not the issue, what is, is whether Area M should share in the responsibility of ensuring that basic or minimum escapement is secured on Chignik's two sockeye salmon runs. This year Chignik fishermen have not had a sockeye fishery because escapements are too low. Area M just west of Chignik is fishing and just completed a 33-hr opening that began on July 6th. Pursuant to Alaska Statutes Title 16 fisheries conservation is mandated as a priority. It would appear that it is being ignored relative to Area M's interception of migrant Chignik sockeye salmon. Politically we understand the pressure that the Department of Fish and Game is experiencing in any attempt to reel-back Area M especially in the Shumagins. Some within the Department have said that more than Chignik salmon contribute to the post-June sockeye salmon catch in Area M. Does this justify ignoring that Chignik supports the two largest sockeye runs on the south side of the Alaska Peninsula and are closest to the Area M South Peninsula fishery east of the Unimak District but yet are failing to meet escapement requirements? Are Chignik fishermen to understand that it is 'ok' to help deplete two major sockeye runs because other alternative sockeye stocks are available?

Chignik is managed on local stock abundance period; it has no interception fisheries unlike management areas west (Area K) and east (Area M) of Area L. We hold that all fisheries should be responsible for conservation, and the south side of Area M should not be an exception.

United Chignik Salmon Fishermen

P.O. Box 21
Chignik, Alaska 99561



PC243
2 of 2



Respectfully we ask that the Board of Fisheries (BOF) take immediate action to limit the interception of migrant sockeye salmon in the Shumagins and other areas east of the Unimak District through July 25th for the explicit purpose of minimizing escapement deficiencies on early and late-run Chignik sockeye salmon. We believe it would be the right thing to do in accordance with Alaska Statutes Title 16 and BOF policies.

Thank you.

Sincerely,

Bruce Barrett (UCSF Fisheries Biologist)



July 9, 2018

WALLACE W. HINDERER

P.O. Box 13

CHIGNIK, AK 99564

EMERGENCY BOARD OF FISH MEETING

GENTLEMEN I OFFER THE FOLLOWING FOR CONSIDERATION.

1. WHEN LIMITED ENTRY WAS IMPLEMENTED AT CHIGNIK, OVER 90 PERMITS WERE ISSUED. IT WAS BELIEVED THE FISHERY WOULD SUPPORT THESE PERMITS. IT WAS A NICE BALANCE.
2. THEN THE BOARD OF FISH FELT THEY SHOULD ALLOCATE FISH AWAY FROM THE CHIGNIK FISHERY TO:
 - A. IGVAK IN KODIAK DISTRICT (15% OF CHIGNIK HARVEST)
 - B. AREA "M" UNLIMITED INTERCEPT FISHERY
 - C. ADF&G REDUCED THE CONCEPT OF ESCAPEMENT NEEDS
 - D. NEW AND MORE FAVORABLE ESCAPEMENT WAS RECOMMENDED. BY THAT I MEAN SMALLER ESCAPEMENT NUMBERS WERE RECOMMENDED AS BEING NECESSARY BY ADF&G
3. THE CHIGNIK FISHERY IS DYING.
 - A. ALMOST 40 PERMITS ARE NOT BEING USED
 - B. THE CITY OF CHIGNIK HAS TOO LITTLE TAX REVENUE.
 - C. FOUR BOATS ARE LEAVING CHIGNIK AS I WRITE.
 - D. OUR FIRST RUN ESCAPEMENT IS 50% OF THE MINIMUM RECOMMENDED NUMBER, REQUIRED



F. WE ARE SITTING ON THE BEACH WHILE
"M" BOATS
AREA ARE FISHING DAILY.

4. WE NEED PROTECTION FROM THE ~~FISH~~ BOARD OF FISH.
AT LEAST SOME OF THE FISH THAT WERE
ALLOCATED AWAY FROM OUR DISTRICT
SHOULD BE RETURNED WE HAVE VISITED
TOO MANY BOF CYCLES ONLY TO HAVE
OUR REQUESTS IGNORED

Wallace W. Anderson
P.O. Box 13
Chignik, Alaska
99564



From: DEBI
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Subject: Fwd: Board of Fish Emergency petition
Date: Monday, July 9, 2018 2:03:41 PM

Sent from my iPhone

Begin forwarded message:

From: wdebi7@msn.com
Date: July 9, 2018 at 1:44:20 PM AKDT
To: Debra Wiley <wdebi7@msn.com>
Subject: Board of Fish Emergency petition

RE: Bristol Bay Native Association emergency petition, Chignik sockeye

Chairman Jensen and members of the Alaska Board of Fisheries,

Our names are Wes and Debi Wiley and Wes has fished salmon since 1965 and I have since 1977 in Kodiak.

We own and operate a set net site on the west side of Kodiak Island outside of Uyak Bay.

Our family and my crew depend on sustainable management of our fisheries resources and we believe in ADF&G management. Having a salmon meeting at the peak of the salmon season in Anchorage is bad for public policy. Not allowing us or other fisherman and the public to testify is bad for the process.

Like all species, salmon experience natural up and down cycles in run strength and timing. Our managers have the tools to be able to properly manage for these fluctuations and should not be micro managed mid season!!

Just because one area doesn't get there fish, why are you blaming it in some other area? We are have a very poor season this year but you don't see Kodiak crying and try to shut down someone else's fishery.

Please let the managers do their jobs and address these proposals at the Work session in October.

Sincerely,
Wes & Debi Wiley
PO Box 101
Larsen Bay, Ak 99624

wdebi7@msn.com

July 9, 2018

Alaska Board of Fisheries
John Jensen, Chair
dfg.bof.comments@alaska.gov

RE: Emergency Petitions on Hatchery Permit and the Chignik Sockeye Fishery

Chairman Jensen and Board Members:

Thank you for the opportunity to comment on the emergency petitions before the Alaska Board of Fisheries (board) on July 17. As salmon processing companies that operate throughout Alaska, we **oppose the Kenai River Sportfishing Association (KRSA), the Bristol Bay Native Association and the Chignik Advisory Committee petitions and request that the board deny them.**

Our processing companies have different business plans but collectively we buy salmon from virtually every state managed fishery in Alaska and have significant investments in many Alaskan coastal communities. The nexus for this joint comment letter is that we all have salmon processing facilities within the Kodiak Island Borough and buy salmon within the region. As seafood companies we are highly dependent on sustainable and renewable fisheries and sound management of these resources.

Emergency Petition Process

Our major concern is the board's emergency petition process. Under 5 AAC 96.625 the Boards of Fisheries and Game recognize that in **rare** instances circumstances may require regulatory changes outside the normal public process. As pointed out in the regulations, the public has come to rely on the regularly scheduled participatory process as the basis for changing fish and game regulations. In accordance with state policy (AS 44.62.270) emergencies will be held to a minimum and are rarely found to exist.

The special meeting called on July 17 hinders the public process in several ways. The notice of the meeting was issued on June 28th with written comments due July 9th - eleven days spanning the July 4th holiday. The actual meeting is open to the public but no written comment or oral public testimony will be allowed during the meeting – a very short time window for the public to react. Salmon fishery stakeholders are fully engaged in the 2018 salmon fisheries in remote areas across the state with very little to no opportunity to participate in the normally transparent participatory public process the State, the board and the public depend upon. The first petition by the KRSA was submitted on May 16th and started the 30 day time clock during which time any additional emergency petitions submitted would automatically be accepted for the special meeting scheduled for July 17th. This loophole allows for any petition to be submitted and added to the agenda of the upcoming meeting without any scrutiny, or prior response from the ADFG Commissioner on whether the petition constitutes an emergency.

Now a second revised meeting announcement issued July 3rd has been released adding three additional emergency petitions addressing completely different issues – Chignik sockeye and

Yukon subsistence drift gillnet fisheries. It is virtually impossible for the public to keep up with the ever changing landscape of what petitions will be addressed at the meeting much less make substantive comment. Additionally, the Commissioner of Fish and Game and his staff are fully engaged in managing the state salmon fisheries. With the truncated timeline, especially for these newly added petitions, it is extremely difficult to fully vet the facts of the petitions by the Commissioner and the Department. The three additional petitions submitted are as follows: Bristol Bay Native Association, submitted June 22nd; Chignik Advisory Committee, submitted July 1st; and Tribal Chiefs, submitted July 3rd. Public comment on any and all petitions remains July 9.

Petitions do not meet the criteria that an emergency exists

According to the Joint Board Petition Policy paragraph (f) of 5 AAC is the pertinent part to evaluate whether an emergency exists:

“...an emergency is an unforeseen, unexpected event that either threatens a fish or game resource, or an unforeseen, unexpected resource situation where a biologically allowable resource harvest would be precluded by delayed regulatory action and such delay would be significantly burdensome to the petitioners because the resource would be unavailable in the future.”

KRSA Petition: ***We concur with the Department (memo dated June 14th) that an emergency does not exist.*** The specific criteria to inform this emergency action is “an unforeseen, unexpected event threatening a fish or game resource”. The approved increase of 20M hatchery pink salmon eggs was well vetted at the Regional Planning Team in 2014. This issue has been addressed twice previously by the board, with no finding of emergency. The board also scheduled a review of hatchery reports during the board’s upcoming work session (October 17 – 18, 2018), which is more appropriate timing for a discussion. Additional results from the Interactions of Wild and Hatchery Pink and Chum Salmon in Prince William Sound and Southeast Alaska studies are expected next year – this is some of the robust scientific information that the board should use. Therefore, as the Commissioner and the Department recommends, we concur that the 2014 approved increase of 20 M hatchery pink salmon eggs is “not unexpected or unforeseen” ***thus an emergency does not exist and the KRSA petition should be denied.***

Chignik Petitions: With regards to the Chignik petitions, the Commissioner’s reviews of these two petitions are not available as yet and may not be available by the July 9th comment deadline and possibly not be available until the actual meeting date of July 17th – again underscoring the poor public process for emergency petitions. While we understand the concerns of stakeholders in Chignik regarding the very low sockeye returns at the time the petition was submitted, this does not constitute an unforeseen or unexpected event given wide variability of wild salmon returns; the current management plans have in place protections for this type of return outcome. It should be noted that sockeye returns to date are at very low levels from Yakutat to Chignik. Kodiak area harvests through the 4th of July are the 8th lowest harvest since 1970 which is when the fish ticket system was implemented. Additionally, as in Chignik, major systems on the south end of Kodiak, based on samples at the weir, are 9% to 17% three ocean fish compared to the predicted amount of 30% to 50%. These three ocean fish would have out-migrated to the ocean in 2015. For the pink salmon fishery failure that occurred in 2016, pink salmon that out-migrated to the ocean in 2015 did not come back in expected numbers which promulgated the pink salmon

disaster declaration. In both cases, ocean conditions are most likely to be blamed for poor ocean survival of these out-migrating salmon.

The Chignik early run is nearly complete and the second run is currently underway. Any action taken by the Board at their July 17 meeting to further restrict interception of Chignik bound sockeye in the Area M and Kodiak salmon fisheries does not have a clear conservation benefit to Chignik beyond what is already provided for in the ADFG management plans. Additionally, any action would be implemented post July 17 of this year - too late to meaningfully affect the 2018 fishing year. We would also note that the Kodiak management plan includes provisions to limit interception of Chignik bound sockeye. The Cape Igvak section opens based on Chignik area harvest, so if Chignik fishing is closed, there is also a closure at Igvak, minimizing Kodiak area interception. **We recommend that the board deny both Chignik petitions since the emergency criteria has not been met.**

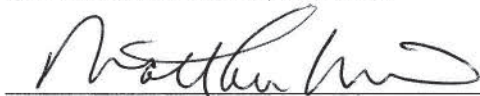
Finfish management for the Alaska Peninsula /Aleutian Islands and Chignik will be reviewed at their regularly scheduled meeting in February 2019 and Kodiak finfish management plan in January 2020. The petitioners concerns can be fully debated at these upcoming respective, regularly scheduled meetings; taking emergency action now only truncates the public process.

Thank you for considering our comments.

Todd Shoup
Director of Operations
International Seafoods of Alaska, Inc.
517 Shelikof St. Kodiak, AK 99615



Matthew Moir
General Manager
North Pacific Seafoods
627 Shelikof St. Kodiak, AK 99615



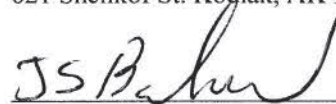
Paul Lumsden
Plant Manager
Trident Seafoods Kodiak
111 W Marine Way Kodiak, AK 99615



Rey Blanco
Plant Manager
Pacific Seafood Group
317 Shelikof St. Kodiak, AK 99615



Jeff Backlund
Kodiak Island Operations Manager
Ocean Beauty Seafoods, LLC
621 Shelikof St. Kodiak, AK 99615



Michael Webb
Plant Manager
Icicle Seafoods, Inc
1 Cannery Road Larsen Bay, AK 99624



Submitted By
Oliver Holm
Submitted On
7/8/2018 11:45:38 AM
Affiliation

Phone
907-486-6957
Email
chicken@gci.net
Address
Oliver Holm
PO Box 8749
Kodiak, Alaska 99615

Chairman Jensen; I wish to comment on the two Chignik emergency petitions. While the reduced return of early run Chignik sockeye is an economic emergency for Chignik it is not a regulatory emergency. The Kodiak area Cape Igvak management plan precludes fishing in the area that is most likely to catch Chignik bound salmon. Due to very low sockeye returns in the Kodiak management area our fishing has been restricted and sockeye catches are way behind normal. Low sockeye returns this year are a Gulf of Alaska wide reality.

Kodiak has a very poor pink salmon forecast for this year and early indications are that the pink return may even be worse than predicted. The Chignik Advisory committee states in their petition that Chignik is managed as an exclusive terminal stock fishery and that unlike Kodiak and Area M, Chignik has no alternative salmon fisheries available. While the Chignik area is managed for the two Chignik sockeye runs it is ridiculous to pretend that their fishing at both area borders are somehow a "terminal" fishery and somehow don't intercept stocks bound for other areas. In 2017 Chignik fishermen enjoyed a record pink salmon harvest. Whether this pink harvest was comprised of Chignik origin pinks or pinks intercepted that were bound for Area M or Kodiak, it was an alternative salmon fishery.

What is occurring in the early Chignik sockeye run is a natural variation in abundance that shouldn't trigger out of cycle allocation changes. I believe that these two petitions should be rejected and the normal board cycle should be followed.

Oliver Holm

July 8, 2018

Submitted By
Oliver Holm
Submitted On
7/9/2018 11:52:18 AM
Affiliation
self
Phone
907-486-6957
Email
chicken@gci.net
Address
Oliver Holm
PO Box 8749
Kodiak, Alaska 99615

Chairman Jensen; I wish to comment on the KRSA emergency petition. I believe that it does not meet the emergency criteria and is based on very flawed information. In looking for a scapegoat for poor chinook returns some have decided to blame pink salmon abundance overlooking the huge increases in the salt water sport fisheries, the competition from cod and pollock in the Gulf of Alaska that had a huge increase in abundance in the eighties and the more recent abnormal ocean temperature regimes in the Gulf. All of these changes would have an effect on chinook returns. In February, March and April cod caught in the jig fishery here in Kodiak are often eating the same small fishes preferred by chinook. Chinook are in close proximity to pollock in this area year round as evidenced by trawl bycatch. Pink salmon are noticeably absent from trawl bycatches. Pollock are a huge biomass in the North Pacific. They may be both a competitor with chinook and also a prey item. To believe that larger chinook can't compete with pink salmon when pink salmon are absent from the near coastal waters most of the year while chinook are present year round is absurd. Hatchery releases are generally the same every year and escapement goals for wild stock pinks similar year to year although escapements do vary because of return rates. The size of pink returns is highly variable depending on ocean conditions. This indicates that pink abundance responds to ocean conditions rather than driving them. The pink returns to the Kitoi hatchery had followed a fairly consistent pattern of best returns on every other odd year. The warm water blob in the Gulf of Alaska of the recent past upset the pattern. At the same time large pink systems on the sw side of Kodiak Island have maintained a consistent even year dominance for decades but are also being impacted by the warm water event. I have been a member of the Kodiak Fish and Game Advisory committee since the early eighties so am quite familiar with the BOF process. I believe that the BOF is ill suited to deal with hatchery production goals. As a long time member of the Kodiak region RPT there is a lot of input from the department, the regional associations, and the public. It may seem sometimes that PAR modifications are a slam dunk at the RPT to the uninformed because most issues will have been worked out through discussions with the department prior to the RPT meeting. Having been involved with salmon enhancement proposals that have not been approved or have taken years to be developed I can say that the RPT is not just a rubber stamp process. I urge the Board of Fisheries to reject this emergency petition. I plan to attend the enhancement meeting planned for October. Oliver Holm. July 9, 2018

From: Raymond
To: [DFG, BOF Comments \(DFG sponsored\)](#)
Cc: [Isreal Payton; State Of Alaska; Blake, Barbara J \(GOV\); Alaska Governor Bill Walker \(GOV sponsored\)](#)
Subject: Emergency Board of Fish meeting
Date: Sunday, July 8, 2018 9:57:27 PM

RE: Salmon emergency Board of Fish petitions

Chair Jensen and Board of Fish members,

I've followed the Board of Fish process since I started running my own boat in 2007. Even though I don't always agree with the decisions made, I still think the process works and should be followed. Having a salmon meeting right in the middle of salmon season is bad public process and impacts my ability to defend sustainable fisheries management. This meeting hurts fishermen who are in the middle of their salmon season. They can't show up to defend their fisheries and no one is allowed to testify at an emergency meeting. Is this how we are going to manage fisheries in Alaska now?

Let the managers do their jobs. Take up these petitions at the October worksession, or take them up in their cycle. The petition by the Kenai River Sportfish Association has already been deliberated on by the Board of Fish and was vetted in the RPT process and approved by the experts at ADF&G. By taking this proposal up in the middle of summer, you are setting a precedent. I feel like this approach is starting a trend for how we want to manage fisheries in the future. Are we really going to question the Department and their management every time a user group disagrees with their decision?

The Bristol Bay Native Association and Chignik Advisory Committee proposals to shut down salmon fishing in Area M and Kodiak are also bad policy. Does a potential one season run failure warrant an emergency petition that creates an emergency Board of Fish meeting? As a commercial fisherman, I've never seen an emergency petition when a management decision put a stop to a herring or crab fishery that I participate in. I accept management decisions and try to work with managers to keep our fisheries sustainable.

Just because you are within your legal authority to have an emergency meeting doesn't mean it's the right decision. Please reconsider.

Raymond May
F/V Sylvia Star, F/V Sitkinak
[PO box 8985](#)
[Kodiak, AK 99615](#)
July 8, 2018
I'm

Alaska State Legislature



Leadership
Majority Whip

Chair
Fisheries Committee
Transportation Committee

Member
Rules Committee
Labor and Commerce Committee
Legislative Council

REPRESENTATIVE LOUISE STUTES
Rep.Louise.Stutes@akleg.gov
House District 32
Kodiak-Cordova-Yakutat-Seldovia

Session:
Alaska State Capitol, #406
Juneau, AK 99801

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Interim:
305 Center Avenue, Suite 1
Kodiak, AK 99615
Phone: (907) 486-8872
Fax: (907) 486-5264

Date: 07/06/18

To: John Jensen
Chairman, Alaska Board of Fisheries

Re: Chignik AC and KRSA Emergency Petitions

Dear Chairman Jensen and members of the Board of Fisheries,

I am writing to express my grave concern with the timing and lack of public process regarding the Chignik Advisory Committee's emergency petition to restrict fishing opportunities in the south peninsula of Area M and the Kenai River Sportfishing Association's (KRSA) petition to limit the number of pink salmon hatchery eggs incubated and released in Prince William Sound.

Addressing the Chignik Advisory Committee's petition, holding an emergency meeting to close Area M when those affected are actively fishing is very poor timing and inappropriate. This is part of a longstanding effort to restrict the sockeye harvest of Area M fishermen. It should be addressed in-cycle or at least not in the middle of the fishing season.

Likewise, KRSA's petition should be addressed in-cycle. In fact, this issue is already on the October agenda and there is no compelling reason offered as to why there should be an emergency meeting ahead of schedule when the main affected user groups will be unable to participate.

I am a strong supporter of a robust public process in fisheries management and that process is weakened when longstanding, contentious issues like these are addressed out-of-cycle in the middle of the fishing season. I humbly ask that the Board consider this during its deliberations.

Sincerely,

A handwritten signature in cursive script that reads "Louise Stutes".

Representative Louise Stutes
Chair, House Special Committee on Fisheries
Alaska State Legislature

From: Ryan Piliae
To: [DEG, BOF Comments \(DEG sponsored\)](#)
Subject: Emergency Petition Comment
Date: Sunday, July 8, 2018 12:01:23 PM

July 8th

Alaska Board of Fisheries
John Jensen, Chair

Chairman Jensen, and Board Members

Thank you for the chance to comment on the emergency petitions before the July 17th Alaska Board of Fisheries. As a Production Manager for Icicle Seafoods in Larsen Bay on Kodiak Island, **I oppose the Kenai River Sportfishing Association (KRSA), the Bristol Bay Native Association and the Chignik Advisory Committee petitions and request that the board deny them.**

I've been with Icicle Seafoods for over 5 years and have come to rely heavily on the positive financial effect of working in the industry. My major concern is the that this special meeting hinders the public as we're in the middle of the fishing season. Any impacted members of the community will not be able to participate in the typically transparent process.

The Kodiak area management plan clearly dictates provisions to limit interception of Chignik bound Sockeye. The Cape Igvak section opens based on Chignik area harvest, so if Chignik fishing is closed there is also a closure at Igvak, eliminating the possibility of Kodiak area interception.

The petitioner's concerns should be debated in their entirety during the regularly scheduled meetings, acting now only curtails due public process. I recommend that the board denies both Chignik petitions as emergency precedent has not been met.

Thank you for considering my comments.

Ryan Piliae
Production Manager
Icicle Seafoods, Inc
1 Cannery Road
Larsen Bay, Ak 99624

Tribal Chiefs Meeting of Grayling, Anvik, Shageluk, and Holy Cross

Support for allowing drift gillnet fishing for fall chum salmon after August 2 in District 4A-Lower (communities of Grayling and Anvik)

WHEREAS, the Yukon River Tribes depend on salmon to sustain their cultural, traditional, spiritual, and economic well-being and way of life; and

WHEREAS, salmon are a critical and irreplaceable food source for Yukon River Tribes where traditionally harvested foods account for up to 33% of their caloric intake and up to 60% of the protein consumed in rural Alaska is salmon; and

WHEREAS, the 2018 Yukon River king salmon run is coming in much lower than expected and subsistence fishing restrictions have severely limited the ability for fishermen to meet their subsistence needs; and

WHEREAS, the 2018 Yukon River fall chum salmon run is expected to provide for escapement and a harvestable surplus; and

WHEREAS, fishermen need to harvest fall chum salmon to supplement their reduced king salmon subsistence harvest; and

WHEREAS, gas prices are prohibitive to being able to efficiently and effectively capitalize on this harvestable surplus of fall chum salmon using only stationary (i.e. set gillnets) gear; and

WHEREAS, drift gillnets are proven to be a more efficient gear type and would allow for subsistence fishermen to capitalize on the harvestable surplus of fall chum salmon; and

WHEREAS, using drift gillnets may be allowed between June 10 and August 2 by emergency order to harvest chum salmon, but is not currently allowed after August 2 when fall chum salmon are present; and

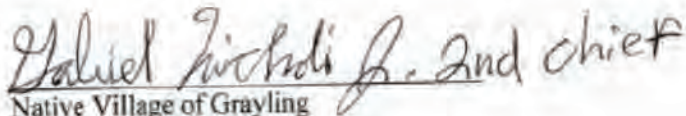
WHEREAS, the upper portion of District 4A may harvest fall chum salmon with drift gillnets after August 2 and the lower portion of District 4A deserve the same opportunity;

NOW THEREFORE BE IT RESOLVED, the Tribal Chiefs of the Native Villages of Grayling, Anvik, Shageluk, and Holy Cross support an emergency petition to the Alaska Board of Fisheries for their July 17 meeting to amend regulations to allow drift gillnetting for fall chum salmon after August 2, so that fishermen may capitalize on the harvestable surplus of fall chum salmon expected for 2018 and use fall chum salmon to supplement a low king salmon subsistence harvest.

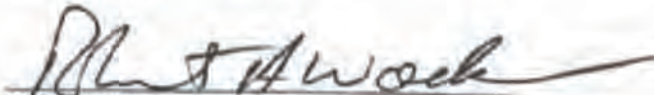
CERTIFICATION

We hereby certify that all Chiefs present unanimously passed this resolution, June 28, 2018, in Holy Cross, Alaska.


Native Village of Holy Cross


Native Village of Grayling


Native Village of Shageluk


Native Village of Anvik

From: Kenneth Chase
To: [DEG, BOF Comments \(DEG sponsored\)](#)
Subject: Letter of support
Date: Friday, July 6, 2018 7:52:29 PM

To Alaska Board of Fisheries

In support of July 3, 2018 petition regarding Fall Chum Salmon Gillnet in Y-4A Lower . This area has requested a Fall Chum Drift opening several times in the past years. Due to bad river conditions, set nets are not the choice of gear, too much moss and lack of good eddies. King Salmon runs as they are, do not fit the needs of some families. Therefore we opt to fish the Fall Chum, which are a good substitute for King Salmon. Summer chum are abundant, however, they are a lesser fish, not much oil and close to spawning areas.

Ref. 5AAC 96.625

Sincerely,
Kenneth W Chase
GASH Advisory Committee
Chair
PO Box 41
Anvik, AK 99558
907-744-5610 Cell
907-663-6377