5 AAC 15.357. Chignik Area Salmon Management Plan.

Reduce the inriver goal for sockeye salmon above the Chignik River weir for August and September, as follows:

Rewrite: 5 AAC 15.357 (b)(3)(B) to read:

(B) the department shall manage the commercial fishery to allow for the passage of at least **20,000** sockeye salmon above the Chignik River weir, in addition to the late-run sockeye salmon escapement needs, to provide an inriver harvestable surplus above the Chignik River weir in August and September of at least **10,000 fish** in August and **10,000 fish** from September 1 through September 30.

What is the issue you would like the board to address and why? The current inriver-goal above the Chignik River weir of 75,000 sockeye salmon for August and September combined, as put in place during the last Board cycle, is too high and effectively prohibits traditional opportunities to commercially fish surplus sockeye and Coho salmon in late August and September. Further, the August inriver goal of 25,000 and the September 50,000 inriver goal each well exceed that necessary to readily meet late season sockeye and/or red-fish subsistence needs. ADF&G reports that total subsistence harvest post- June combined for all waters upstream of the Chignik River weir (Chignik River, Chignik Lake and its tributaries and Black Lake) is less than 3,000 sockeye salmon (ADF&G Subsistence Div. report, 2015). A more balanced inriver subsistence goal would be 10,000 sockeye for each of the two months for a total 20,000 fish, an amount nearly 600 percent more than the estimated total post-June sockeye subsistence harvest of less than 3,000.

Further consideration is that the original request for the current August and September inriver goals of 25,000 and 50,000 sockeye salmon respectively for a total of 75,000 fish was based in part by the belief that the second or late-run escapement needed to be higher than that managed by ADF&G to improve second run production. While the subsistence priority is fully recognized and most valid, it should not be used to go beyond reasonableness to where a higher escapement is mandated well beyond that necessary to fully satisfy local subsistence requirements and opportunities.

An August and September inriver goal of 10,000 for each of the two months for total of 20,000 sockeye salmon is sensible. Such would readily ensure a healthy surplus of fish beyond local subsistence needs and yet still encourage the opportunity for a late-season fishery particularly on local Chignik Coho salmon. Further consideration is that a late-season commercial Coho salmon fishery may well advantage late-run Chignik sockeye salmon production, per FRI (Univ. of WA). Several studies provide evidence that Coho fry predation on juvenile sockeye salmon rearing in Chignik Lake is substantially suppressing late-run sockeye salmon production. Establishing a 10,000 August and a 10,000 September inriver sockeye salmon goal for a total inriver goal of a 20,000 fish would be functional for all concerned and is therefore respectfully requested.

5 AAC 15.357. Chignik Area Salmon Management Plan.

Amend the *Chignik Area Salmon Management Plan* so that pink, chum, and coho salmon stocks in the Western and Perryville sections of Area L will be managed based on the strength of the pink, chum, and coho salmon stocks in the Stepovak and Shumagin Islands sections of Area M, as follows:

A. From July 9 through September 30, (1) the department shall manage the Chignik fishery of the Perryville and Western Districts of the fishery based on the abundance of pink, chum, and coho salmon stocks in the Stepovak area of the SEDM and the Shumagin Islands; (2) When fish stocks of pink, chum and Coho Salmon have low escapement in the Stepovak Area of the SEDM and the Shumagin Islands during July, August and September the Perryville District 275-40, 275-50, 275-60 and the Western District 273-74, 273-80, 273-90 will be closed there are significant returns of salmon in the streams and Area M fishermen are able to commercial salmon fish in these areas; (3) In July and August in the Perryville District and Western District there shall be at least one 48 hour closed period within a seven day period in order to maintain healthy fish stocks in the SEDM.

What is the issue you would like the board to address and why? Local Set Net and Seine fishermen have been denied access to harvesting salmon in August and September these past few years due to low numbers of westward returning chum and pink salmon in the Stepovak Area and Shumagin Islands. At the same time the Area M fishermen are shut down Chignik fishermen are fishing 7 days a week day after day catching and producing high numbers of Pink Salmon and Chum Salmon destined for the Stepovak Area and Shumagin Islands while the Area M fishermen are shut down and salmon are not returning to the local streams. When fish stocks of Pink Salmon and Chum Salmon have low escapement within the Stepovak Area of the SEDM and Shumagin Islands during July, August and September the Perryville District and the Western District will be closed until there are significant returns of salmon in the streams and Area M fishermen are able to commercial fish in these areas. In early July and August in the Perryville district and Western district there shall be at least one 48 hour closed period within a seven day period in order to maintain healthy fish stocks in the SEDM and Shumagin Islands.

5 AAC 15.357. Chignik Area Salmon Management Plan.

Increase commercial salmon fishing opportunity in the Western and Perryville districts, as follows:

- (d) In the Western and Perryville District,
- (1) during June, the commercial salmon fishery shall open concurrently with the Chignik Bay and Central Districts, and the Inner Castle Cape Subsection of the Western District, and the openings shall be based on achieving the Black Lake sockeye salmon escapement goals;
 - (2) from approximately June 26 through July 8,
 - (A) the department shall evaluate the strength of the sockeye salmon late run; and
 - (B) in order to continue managing the Black Lake sockeye salmon harvest and escapement, while assessing the Chignik Lake sockeye salmon run strength, commercial salmon fishing in the Western District will, in the department's discretion, be disallowed or severely restricted;
- (3) from the end of the transition period, described in (b)(2) of this section, until the end of the fishing season, the department shall manage the commercial salmon fishery based on its evaluation of local pink, chum, and coho salmon runs, and the escapement objectives of the Chignik Lakes' system sockeye salmon.

What is the issue you would like the board to address and why? Chignik Fishermen have little to no access to half of their fishing area prior to July 6. By regulation, Chignik Fishermen are only allowed a maximum of two 48 hour openings in the Western District between June 1 and July 5.

Chignik bound sockeye are being aggressively harvested in Area M beginning June 7 of each year, yet Chignik Fishermen are only allowed two 48 hour openings to harvest sockeye in their own Western Districts prior to July 5, just a few miles northeast of where the Area M Fishermen are allowed to harvest practically non-stop. With interception fisheries on both sides, Chignik Fishermen need all the fishing area available to them to be open to fishing when escapement goals are being met. When Cape Igvak is open, fishing in the Eastern District in Chignik drops off almost immediately. This compresses the Chignik fleet and reduces fishing opportunities for the entire fleet, especially when coupled with reduced sockeye abundance due to the sockeye intercepted just a few miles away. Opening the Western District would allow Chignik Fishermen more area to move to when fishing is negatively impacted by interception, as well as providing more opportunity for harvest of Chignik bound sockeye that is currently unavailable under the current regulations.

5 AAC 15.357. Chignik Area Salmon Management Plan.

Open the Western District to commercial fishing for salmon for up to 48 hours each week from June 1 to July 5, as follows:

5 AAC 15.357. Chignik Area Salmon Management Plan. Amend (e) to read:

(e) Notwithstanding the provisions of (d) of this section, in the Western District, excluding the Inner Castle Cape Subsection, the commercial salmon fishery shall open concurrently with the Chignik Bay and Central Districts, and the inner Castle Cape Subsection of the Western District, from 1 June through July 5 for no more than 48 hours each week with a closure of not less than 48 hours between fishing periods.

What is the issue you would like the board to address and why? WESTERN DISTRICT ---- PROVIDE WEEKLY FISHING OPPORTUNITY UP TO 48Hrs. JUNE – JULY 5 UNDER TERMINAL STOCK MGMT.

The Western District of the Chignik Management Area (CMA) borders the Central District and its eastern boundary is only 30 miles from Chignik Lagoon. The CMA's Perryville District, which lies between Area M's Southeastern District Mainland (SEDM) and Chignik's Western District, is about 55 miles in width. The Eastern District is east of the Central District of the CMA and borders the Kodiak Management Area at the Cape Igvak Section. Immediately west and east of the CMA are two Board of Fisheries sanctioned Chignik interception fisheries, to the west the Area M SEDM Fishery and to the east the Kodiak Cape Igvak Fishery. Both are specifically managed for early and late run Chignik-bound sockeye salmon June through July 25.

Currently the Western District is managed exclusively on Chignik-bound sockeye salmon from 1 June through 5 July. However permitted are only two 48 hour maximum periods in those 6 weeks. Requested is the opportunity for a single (1) 48-hour fishing period per week in the Western District through July 5 when the Central and Chignik Bay (Chignik Lagoon) districts are open. Justification is that Chignik-bound sockeye interception fisheries are well established on the west and east sides of the CMA June through July 25, and in recognition of such, a modest increase within the CMA fishing grounds is reasonable given that Western District openings would be totally dependent on local-stock availability, escapement goals being met, and concurrent openings in the CMA districts to the east including Chignik Lagoon. In further support it bears recognition that the Perryville District would continue to provide a buffer between the Western District and the SEDM of Area M as the Perryville District is closed to salmon fishing June through early July. Lastly, the CMA seine fleet should not be ham-strung by a 'keep-them-in-the-box philosophy' as held by some who would say that the fleet does not require more fishing area for local stock exploitation simply because any deviation from the past could be precedent setting. To a degree one might find this arbitrary and certainly well less than objective and unfair.

For evaluation, a 3-year sunset provision could be applied on the proposed regulatory change.

5 AAC 15.357. Chignik Area Salmon Management Plan.

Increase commercial salmon fishing opportunity in the Western and Perryville districts from June 1 through July 5, as follows:

5 AAC 15.357. Chignik Area Salmon Management Plan.

Amend (e) to read:

(e) Notwithstanding the provisions of (d) of this section, in the Western District, excluding the Inner Castle Cape Subsection, the commercial salmon fishery may be opened and closed concurrently with the Chignik Bay and Central Districts, and the inner Castle Cape Subsection of the Western District, from 1 June through July 5.

And in the Perryville District from 1 June through July 5, three 48 hour salmon fishing periods may be permitted subject to concurrent fishing in the Chignik Bay and Central Districts, and the inner Castle Cape Subsection of the Western District and not less than a closure of 48 hours or more between periods.

What is the issue you would like the board to address and why? PROVIDE LIMITED SALMON FISHING IN THE PERRYVILLE AND WESTERN DISTRICTS, JUNE 1 THROUGH JULY 5 ON CHIGNIK SOCKEYE SALMON.

On behalf of the Native Villages of Perryville and Ivanof Bay respectfully requested is that the Alaska Board of Fisheries provide limited harvest opportunity on Chignik-bound sockeye salmon in the Perryville and Western Districts during June and early July. The purpose is to reduce travel time and other expenses for village fishermen, and secondarily provide more orderly fishing and fleet dispersal opportunities for all Chignik fishermen.

During June and early July in the Western and PV Districts the primary sockeye stock is Chignik-bound fish as evident by the Area M SEDM fishery, immediately to the west of Perryville, which is regulated in June and July on east-bound Chignik sockeye salmon exclusively. Further evidence is in the Dolgoi Island Area. Based on the most recent genetic study about one-half of the catch in those waters, 76 miles to the west of the Perryville District, are migrating Chignik fish. It is also known that east-bound Chignik sockeye salmon are harvested in the Shumagin Islands in June and well into July.

Our villages, Perryville and Ivanof Bay, are dependent on salmon fishing culturally and economically, and we want to preserve, cultivate, and maintain our way of life without having to be reliant on Chignik and Chignik Lagoon as a fishery base. It is extremely difficult and costly for local fishermen to travel home between closures, which can be extensive. As previously stated, we would like access to Chignik bound salmon when escapement needs are being met according to terminal-stock management on Chignik sockeye salmon. Currently the entire Perryville District is completely closed in June and early July, and in the Western District a maximum of only two 48 hour fishing periods or 4 days are allowed, if at all. This we find insufficient and burdening. We ask only for fairness and consideration and not a handout or special treatment. Thank you.

PROPOSED BY: Patrick Kosbruk and Edgar Shangin	(HQ-F18-009)
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5 AAC 15.357. Chignik Area Salmon Management Plan.

Prohibit commercial fishing for salmon in the Perryville District and Mitrofania Section until the Orzinski Lake sockeye escapement goal is met, as follows:

The Mitrofania and Perryville districts will not open until red salmon escapement levels are met in the Orzinski red system.

What is the issue you would like the board to address and why? The Chignik fishery is becoming a new and expanding fishery, especially in the Mitrofania and Perryville districts. The interception of westbound reds in these areas may be having a detrimental effect on the Orzinski red returns.

PROPOSED BY: Sand Point Fish and Game Advisory Committee	(HQ-F18-066)
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5 AAC 15.357. Chignik Area Salmon Management Plan.

Prohibit commercial fishing for salmon in the Perryville District and Mitrofania Section when the Southeastern District is closed to commercial fishing for salmon, as follows:

When the SEDM section of the south peninsula is closed because of escapement concerns, the Mitrofania section and Perryville district will close to commercial salmon fishing until the SEDM reaches its escapement goals.

What is the issue you would like the board to address and why? In recent years the SEDM has not opened in late July and August until escapement levels had been reached. At the same time the Mitrofania and Perryville districts were permitted to remain open while they were targeting west-bound fish.

PROPOSED BY: Sand Point Fish and Game Advisory Committee	(HQ-F18-067)
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5 AAC 15.357. Chignik Area Salmon Management Plan.

Adopt a large fish escapement goal for king salmon, as follows:

The solution I recommend is that jacks should not be counted in the escapement goal.

Only mature Chinooks can be counted in the escapement goal.

What is the issue you would like the board to address and why? Only mature Chinook salmon can be counted in the escapement goal numbers.

The reason I would like to see this policy implemented is that 1,350 kings is too small of an escapement goal for the Chignik River. Some years, jacks account for 25% or more of the Kings' escapement goal. Most Rivers use sonar and only count large Kings. Jacks skew the male-female ratio.

PROPOSED BY: Tom Corr	(EF-F18-093)
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