



December 24, 2019

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

Re: Opposition to Proposal 59

Dear Chairman Morisky and Board of Fisheries Members,

I am Alex Roth, Kodiak and Lower Cook Inlet salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife and I reside in Homer, but fish in Kodiak. I own and operate the F/V Wandering Star. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before *any fishing at Igvak occurs*. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak.

The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits.

I ask that the Board reject proposal 59 and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,

Alex and Jaime Roth
F/V Wandering Star
Homer, Alaska



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

Bo Calhoun 57177 Zulu Ct. Homer, AK 99603 12/26/19 RE: Opposition to Proposal #59 Dear Chairman Morisky and Board of Fish members: I'm a third generation Kodiak salmon seiner. I was born and raised in Homer, AK and continue to live here. My wife and I hope to raise our two sons on our family seine boat in a healthy Kodiak salmon fishery. I respectfully request you reject Proposal #59. The average Cape Igvak harvest has been significantly less than the 15% allocation. The current management plan is executed conservatively to avoid Kodiak fishers catching more than 15%, and is working as intended to limit this traditional fishery. Please reject Proposal #59. Sincerely, Bo Calhoun



Brad Marden
PO Box 2856
Homer, AK 99603

December 23, 2019

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

RE: opposition to Proposal 59

Dear Chairman Morisky and Board of Fish members:

I first participated in the Kodiak seine fishery for salmon in 2004. Since then, I've worked as a deckhand in various salmon, halibut, and herring fisheries throughout the state, before buying my own boat in 2012, followed by a Kodiak seine permit in 2013. Since then I have exclusively fished in Kodiak waters. I respectfully request the Board **reject Proposal 59**.

Proposals to reduce the Cape Igvak allocation are a perennial request at the Kodiak and Chignik finfish meetings, and have been consistently rejected by the board in the past, for good reason. The allocation of 15% of overall Chignik bound fish is based on a historical use of the regional salmon resource from before limited entry. Repeating the same requests year after year to change allocation does not make a compelling case to warrant a change. When Chignik salmon escapement is weak, Kodiak fishermen do not get any fishing opportunity at Cape Igvak- this is fair; it also seems fair that in years of Chignik salmon abundance Kodiak fishermen should get a chance to catch the historical allocation. The Cape Igvak fishery helps spread out our fleet and can be an important part of having a decent fishing season for Kodiak fishermen.

I am sure that the Board tires of endless testimony claiming that the fish of concern are "our fish being stolen by those guys over there". It seems that in my 15 years of commercial fishing in Alaskan waters, Kodiak salmon fishermen are often on the defensive. Rather than retaliate with countering proposals of our own, I ask that we maintain status quo and keep historical allocations and fishing opportunity at Cape Igvak. For this reason, I ask that you **reject Proposal 59**. I want to thank you for your service and I hope the Board continues to apply consistency in upholding Mixed Stock Fisheries Policy, and the Sustainable Fisheries Policy.

Sincerely,

Brad Marden



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

My name is Brian Mcwethy. I was born and raised in Kodiak. I live in Kodiak with my family and we all depend on my income. I fished with my father on his seiner growing up and now I own and operate a seiner. Salmon seining and Tanner crab fishing in Kodiak are currently our only sources of income. I plan to try and continue to fish the Kodiak waters and possibly my children will have the opportunity to. I hope the current and historical areas we fish aren't taken from us and the future generations of Kodiak. I oppose this amendment because I based my business model on being able to fish this area.



December 22, 2019

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

Re: Opposition to Proposal 37

Dear Chairman Morisky and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak, Alaska. I grew up fishing on my dad's boat and got my first crew job working for someone else two weeks after I graduated high school. I haven't missed a salmon season since. I bought into the fishing industry in 2011 with the purchase of a 25-foot jig boat that I worked for two years in the winter and spring months while I still crewed for salmon in the summer. Access to the jig fisheries focusing on cod and rockfish was the only way that I could afford to move into the salmon fleet with a 38-footer in 2013. After the recent cod collapse I now primarily rely on salmon seining and live here year-round with my wife.

Historically the average allocation in the Cape Igvak management plan has been approximately 13%, even though the allocation is managed for 15%. The author of this proposal is making the assumption that it is common for Cape Igvak fisherman to exceed the 15% allocation, and therefore we are given a larger allocation than the 15%. The historic average shows that this assumption is false.

Should proposal 59 go through, Kodiak fisherman would be looking at roughly 22-23% loss of the 15% allocation. On years where Chignik has a strong run, this could mean hundreds of thousands of fish lost to Kodiak fishermen from their traditional and historic fishery. This proposal, which has been repeatedly rejected by the Board of Fisheries including in 2017, is designed to conceal an allocation reduction of harvest in the Cape Igvak area, while proposing to fix a problem that doesn't exist.

Taking away any fishing opportunity from Kodiak fishermen, particularly from the small boat fleet, would have a direct negative impact on new entrants trying to gain a foothold in this industry, fishing families trying to get by, and fishing support businesses in our region. I'm proud to call Kodiak home and am working to protect our fishing way of life.

Sincerely,
Chris Johnson
F/V North Star



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

The genetic report done by Shedd from 2014 to 2016 indicates that the '90% of sockeye caught in the Cape Igvak section are Chignik bound' guideline, which can be a gross overestimation depending on ocean currents and winds. In addition to that, the proposer's hypothesis is that Kodiak fisherman are regularly catching more than the allocated 15% of Chignik harvest. However, historically on years that the Cape Igvak section has been open for fishing, Kodiak fisherman average 13% of Chignik total catch in area.



December 22, 2019

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

Re: Opposition to Proposal 59

Dear Chairman Morisky and Board of Fisheries Members,

My name is Danielle Ringer and I appreciate the opportunity to comment on proposals before the Board in writing and in person for the Kodiak finfish meeting. I live in Kodiak with my husband and we own and operate the 38-foot F/V North Star. We chiefly rely on salmon seining and cod and rockfish jigging to maintain our fishing way of life and ability to live on Kodiak Island. I grew up in Homer learning to harvest and process fish from my parents in Kachemak Bay and dipnetting on the Kenai River. I hold a Master's degree from the University of Alaska Fairbanks in Political Ecology of Fisheries and was one of the researchers on the *Graying of the Fleet in Alaska's Fisheries: Defining the Problem and Assessing Alternatives* study in the Kodiak region.

Historically the average allocation in the Cape Igvak management plan has been approximately 13%, even though the allocation is managed for 15%. The author of this proposal is making the assumption that it is common for Cape Igvak fisherman to exceed the 15% allocation, and therefore we are given a larger allocation than the 15%. The historic average shows that this assumption is false.

Should proposal 59 go through, Kodiak fisherman would be looking at roughly 22-23% loss of the 15% allocation. On years where Chignik has a strong run, this could mean hundreds of thousands of fish lost to Kodiak fishermen from their traditional and historic fishery. This proposal, which has been repeatedly rejected by the Board of Fisheries including in 2017, is designed to conceal an allocation reduction of harvest in the Cape Igvak area, while proposing to fix a problem that doesn't exist.

Please do not accept Chignik's proposals seeking to hack away at Kodiak's salmon fishery. I see no biological, scientific, historical, economic, nor sociocultural reasons that could justify the Board making any changes to the Cape Igvak management plan and thus create ripple effects negatively impacting Kodiak fishermen, processing workers, and community businesses. Thank you for your consideration of my comments and I look forward Board of Fisheries members spending time in our fishing community during the Kodiak meeting.

I humbly request the Board to reject this proposal.

Respectfully,
Danielle Ringer, M.A.
F/V North Star



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

Historical averages of Cape Igvak catches show exceeding the 15% allocation is unlikely. The Igvak Management Plan is working just fine the way it is currently designed. Downstream effects of the proposed changes have far reaching negative consequences for Kodiak fishermen as fishing abundance fluctuates.



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

The management plan has worked fine since 1978. During years with high production Kodiak salmon fisherman get openings. During years of low production openings are few or none.



Fred Stager

F/V Lady Lu

December 12, 2019

Alaska Board of Fisheries Board Support Section

P.O. Box 115526 Juneau, AK 99811-5526

RE: Opposition to Proposal 59

Dear Chairman Morisky and Board of Fish Members,

This proposal, which has been repeatedly rejected by the Board of Fisheries including in 2017, is designed to conceal an allocation reduction of harvest in the Cape Igvak area, while proposing to fix a problem that doesn't exist. Kodiak fishermen have consistently averaged 20% *below* their allocation of Chignik bound sockeye as conservative management practices ensure that harvest overages are rare. Additionally, there is no indication that harvest overages in area M have ever led to overharvest in the Kodiak area. Area M fishermen are provided with a historical allocation of 6.5% of Chignik Bound fish, so that even if they were to harvest double their share, Kodiak's 15% percent allocation of the overage would only result in a temporary harvest goal that is less than 1% higher than it otherwise would be, which isn't nearly enough to overcome the typical 20% that the Kodiak fleet typically leaves on the table.

There are the allocative implications of the change to the harvest equation in the proposal. This proposal would result in significant loss of harvest opportunity in the Kodiak Management Area. If the Board finds cause to change the algebraic structure of how Kodiak's allocation is calculated in



order to base harvest at Cape Igvak exclusively on harvest in the Chignik area then the new equation must be formulated to have no impact on the net sockeye allocation to the Kodiak fleet.

Please **reject proposal 59.**

Thank You- Fred Stager



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

Dear Chairman and Members of the Board, As a young fishermen who is working their way into the Kodiak Salmon fishery this proposal will cause Kodiak fishermen to lose a substantial amount of their catch. I have been investing into the Kodiak salmon fishery as much as possible, in 2019 I purchased a Kodiak salmon permit. I ran a seiner for the month of august. I plan on running the same boat for the entire 2020 salmon season in Kodiak. When I was younger I remember testifying against proposals similar to these. These proposals are re-allocations of Kodiak historical catch. Kodiak has always had intercept fisheries and we already have management plans in place that have been effective for the Kodiak salmon fishery. Please help ensure the future for young fishermen entering into the Kodiak Salmon fishery, and the people who have been investing and are established in the fishery. Thank you for considering these comments, Garrett Kavanaugh



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

Dear Chairman Morisky and Board of Fish members: I am 31 years old and a life long resident of Kodiak. I grew up set netting in Uganik on the west side of the island with my mother until i was 14. I then started seining with my father until I was able to buy my own Kodiak seine operational the age of 27. Please oppose porposal 59 as it is yet another grab at fish. Historically we have been allocated 15% of the chignik run. this proposal makes it look like we have been exceeding this allocation, but in reality we have only averaged 13%. if proposal 59 is approved then this would result in a significant loss of fish from the Kodiak fishing community. thank you for your time Sincerely Iver Holm



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

I have been intimately involved in the Kodiak seine fishery since 1968 to present. Presently my son is fishing the Kodiak area and it is my desire to have my grandsons be able to participate in a healthy Kodiak fishery if they so desire. Throughout my career I have come to the conclusion that the ADF&G management for Kodiak has been stellar and has kept the stocks in Kodiak healthy overall with the current management plan. The current management plan disallows fishing time in the Cape Igvak section when chignik runs are weak, but still allows kodiak fishers access to their traditional fishery when runs are more robust. C. Igvak early run has been closed 4 out the last 6 years. Alaska boats and permits asking value is \$40,000 for Kodiak permits and Chignik permits are \$100,000. I believe Kodiak fishers deserve access to their traditional fishery under the present management plan. I oppose proposal 59.



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

My name is Jamin Hall, my wife and I have a set net site in Uganik Bay. I am writing in opposition to proposal 59.



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

Historically the average catch has been lower than the 15% that the Management plan allows us to catch, indicating that the allocation is already managed conservatively. The Management Plan has been working for more than 40 years and has endured the cycles to date. While I sympathize with the recent poor catches in Chignik, I don't believe a long term change is warranted.



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

December 27, 2019

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

RE: CAPE IGVAK MANAGEMENT PLAN
Chignik Proposals 58, 59, 60, 61, 62

Dear Chairman Morisky and Board Members:

The Kodiak Salmon Work Group (KSWG) is an ad hoc committee created to address the issues of Cook Inlet bound sockeye captured in the Kodiak Management Area and the continuation of the Cape Igvak Management Plan. Membership is open and encompasses seiners from both Kodiak seine organizations, setnetters from both Kodiak setnet organizations, beach seine permit holders and processors. In other words, all of Kodiak's salmon fishing community. The group is supported by voluntary stakeholder contributions including those from the City of Kodiak and the Kodiak Island Borough.

KSWG is herewith submitting several documents for the Board's review: 1. Structure and Function of the Kodiak Management Area Salmon Fisheries; 2. Review of Cape Igvak Salmon Management Plan and Proposals to the Alaska Board of Fisheries; and 3. Economic Analysis of Proposals 58, 60,61 and 64. An informational map is attached as well.

Cape Igvak Management Plan (Proposals 58-62)

Chignik's four substantive proposals regarding the Cape Igvak management plan don't outright request that the Board set aside the plan. Instead they focus on provisional changes that would



gut Kodiak's Cape Igvak fishery. Proposal 58 with the date change would reduce, on average, Kodiak's fishery by 79%. Proposal 59 is an accounting change that would reduce the Cape Igvak fishery by about 20%. Proposal 60, like proposal 58, would reduce Kodiak's revenues by about 67% and proposal 61 comes in with a 69% reduction. The fifth proposal (Proposal 62) is a record-keeping proposal that is untenable.

The Cape Igvak Management Plan is embedded in the Mixed Stock Fisheries Policy: "Most mixed stock fisheries are long standing and have been scrutinized many times by past Boards. Consequently, existing regulatory management plans are understood to incorporate conservation burden and allocation" (Allocation Criterion 2). Chignik's guaranteed catch allocation of 300,000 fish (early run) and 300,000 (late run) was a clear balancing in the original plan, favoring Chignik by providing an economic safety net. In addition, Kodiak would share the conservation burden in that the escapement would be assured before Kodiak would go fishing. On the other hand, if Chignik gets its escapement and minimum guaranteed catch, then Kodiak is allowed to harvest up to approximately what was historically caught in the fishery. This is a fairly balanced plan, if not already overbalanced to Chignik's advantage!

Also, the Board states in Allocation Criterion 3, "The policy should recognize that salmon resources are generally fully utilized and that stability is an important aspect of the fisheries." Why is stability important? Many salmon stakeholders make investments and commitments based on regulatory stability. If salmon management plans are subject to change with every Board cycle, fishery values (ex-vessel, permit and gear) will decrease as uncertainty increases, conservation may be compromised, and stakeholders will be encouraged to try to "get a better deal" at each successive Board meeting.

The history of the Cape Igvak Management Plan (Allocation Criterion 1) is of critical importance to understanding why it was developed and how it was balanced between stakeholders. Prior to the plan Kodiak could fish at Cape Igvak any day that the Chignik fleet fished. The "day for day" fishing caused area managers concern that Kodiak's fishing could impact a weaker "second run" to Chignik. Consequently, the catalyst for the Cape Igvak Management Plan was conservation of Chignik's runs. The plan balanced the conservation burden between the two



areas. The plan has been in place for 42 years and has had constant review over multiple Board cycles. Its durability establishes it as one of the marquee fishery management plans in the State of Alaska. Changing a plan of such long duration without significant “new information” or “new fishing patterns” or “stock of concern” assessments or anything other than a proposer’s feeling that something should be changed, compromises and undermines the Board’s standing as a fair and impartial deliberative body.

The functionality of the Cape Igvak Management Plan as a conservation plan is seen in the plan’s application over the past five years. Because of low Chignik escapements there was no Cape Igvak fishery during 3 seasons. Period! Kodiak cannot be held responsible for any of the current biological or economic issues in Chignik due to low Chignik sockeye returns. Kodiak did not fish at Cape Igvak.

The proposer’s assertion, under Allocation Criterion 4, that Kodiak’s salmon fishermen have more “alternative resources” is a false assertion. If this means that Kodiak has more salmon numerically or by species, then the Board must also recognize that Kodiak’s salmon are divided between approximately 180 active seine fishermen and approximately 150 setnet fishermen ---in contrast to about 75 active Chignik permits. Resource availability is reflected in individual gross earnings. Chignik permits, on average over time, continue to earn more than Kodiak fishermen and, consequently, their permits are worth more in the market. “Alternative resources” in this sense would mean that Kodiak had less “alternative resources” per active permit holder than Chignik.

If the “alternative resources” idea means that Kodiak has more “species” available than Chignik salmon fishermen, this too is false. Both Kodiak and Chignik fishermen have access to halibut and cod in their areas although the Federal cod season is now closed in both areas. Only two or three Kodiak salmon fishermen are involved in the Gulf of Alaska trawl fisheries --- a fishery that limits participation with high costs of entry. Both Chignik and Kodiak have historically had a Tanner crab season. While Kodiak currently has a very small Tanner crab quota, only a subset of the Kodiak salmon fleet (like the Chignik fleet) have limited entry permits for the Tanner crab fishery. The Kodiak herring fishery is essentially gone. Kodiak fishermen, especially those from



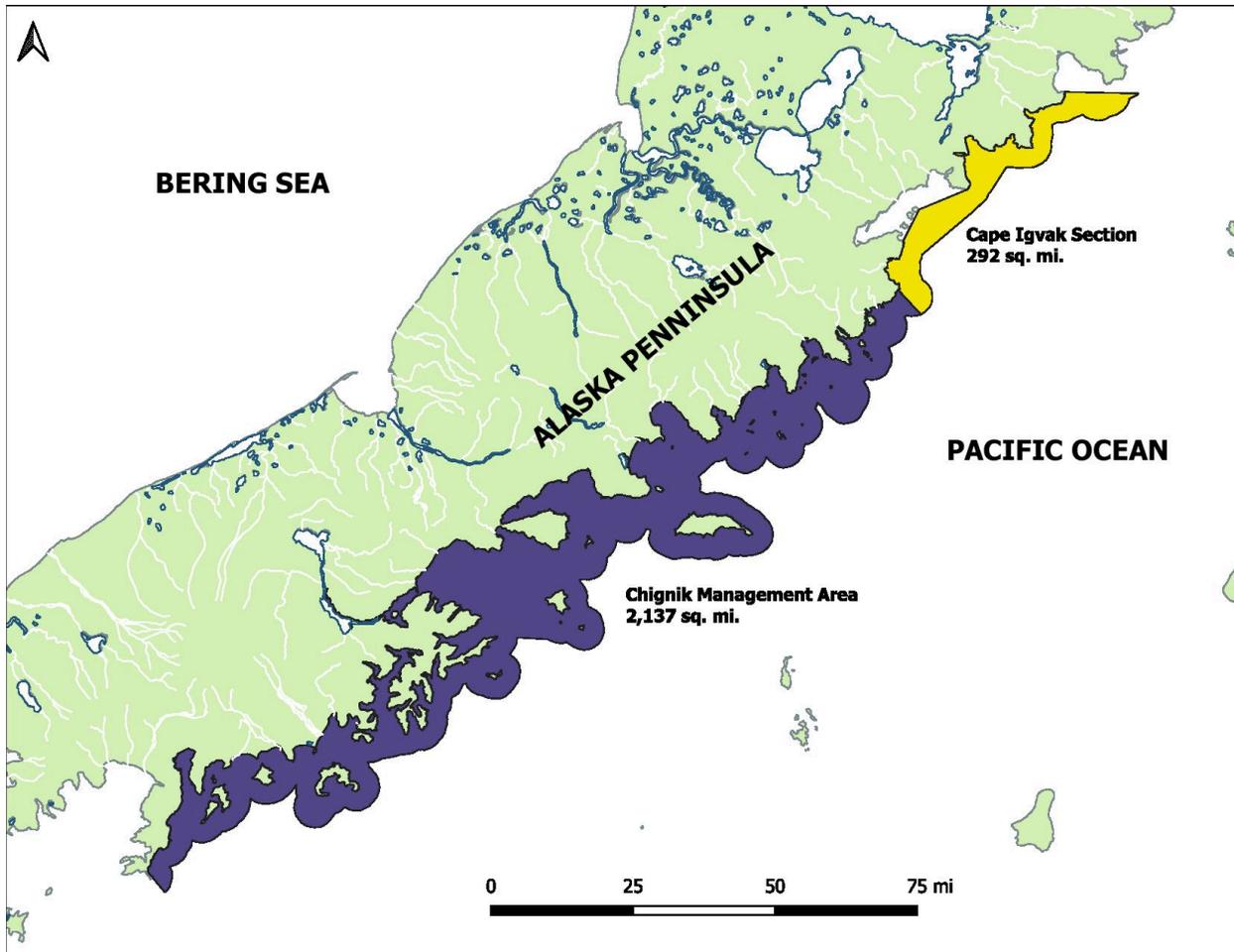
Old Harbor, Akhiok, Ouzinkie, Port Lions and Larsen Bay just don't see what "alternative resources" are available in Kodiak that Chignik doesn't have. All rural communities in the Gulf of Alaska under about 1,500 people are struggling to survive on their fisheries economy--- which is now almost exclusively salmon.

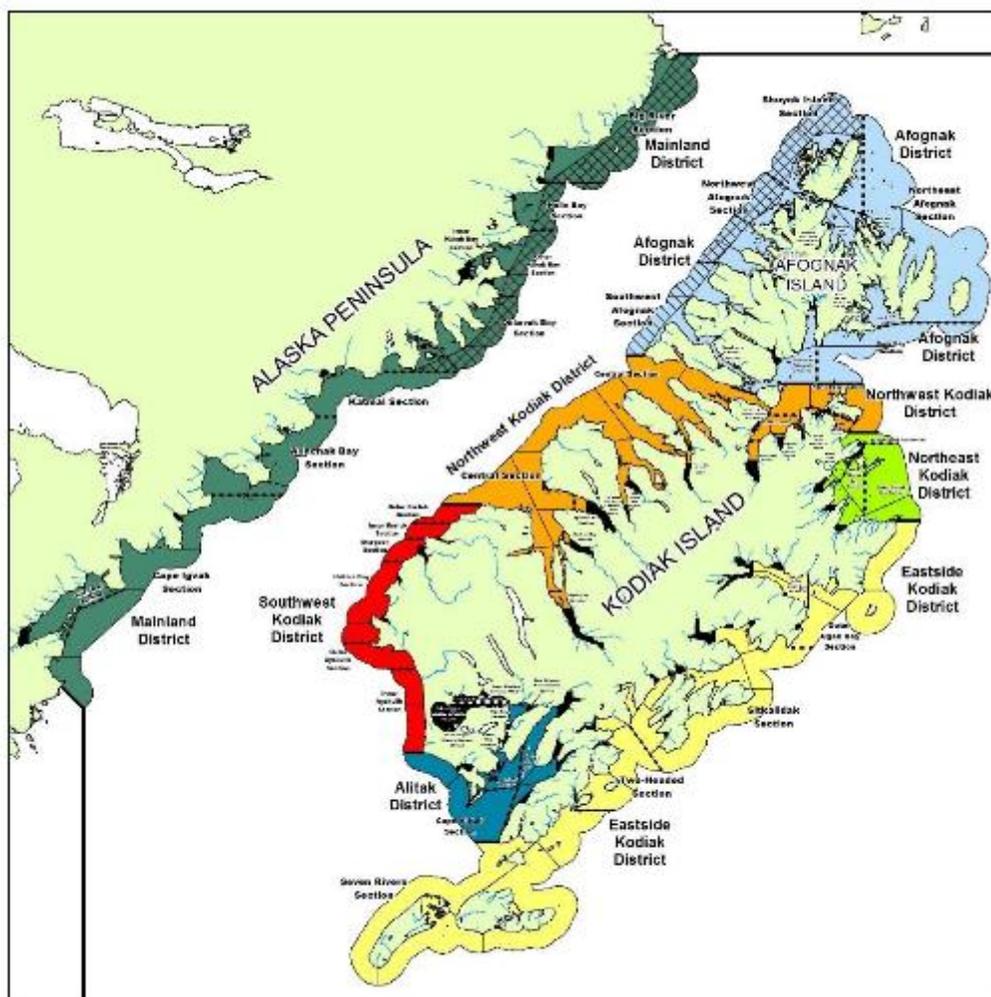
Finally, "The importance of the fishery to the economy of the region and the local area" (Allocation Criterion 7) favors Kodiak. The loss of the Cape Igvak fishery would cost Kodiak fishermen, on average, almost 4 million dollars. At best, the Igvak fishery would increase earnings by a subset of fishermen that actually live in Chignik or the Chignik region by less than an average of 12.0%. While not insignificant, the Igvak fishery is of reduced "importance to the economy of the Chignik region" when compared with the decline of active vessels and the number of Chignik fishermen that are now fishing in Kodiak and Prince William Sound. See further: [Review of the Cape Igvak Management Plan and Proposals to the Alaska Board of Fisheries, Proposal 58 Economic Analysis, Proposal 60 Economic Analysis and Proposal 61 Economic Analysis.](#)

In summary, it is the position of the Kodiak Salmon Work Group that the Board should vote NO on proposals 58, 59, 60, 61, 62 and 63. These proposals are not supported by the Board's allocation criteria and do not have a rational relationship to Chignik's conservation needs.

Very truly yours,

Duncan Fields, Chairman





Review of Cape Igvak Salmon Management Plan and Proposals to the Alaska Board of Fisheries

Kodiak Salmon Working Group



Executive Summary

- The Cape Igvak Salmon Management Plan (CISMP) has been in place since 1978 and allocates 15% of total Chignik sockeye harvest to Cape Igvak (Kodiak Management Area) after Chignik is guaranteed 600,000 harvest from early and late runs combined, and escapement goals are projected to be met.
- Management strategies under CISMP have been very successful in meeting the sockeye allocation objective and providing escapements within goals.
- Recent genetics studies are robust, but limited sampling with highly variable results does not in itself justify changes to the management plan.
- Genetic results show that the current regulatory assumption that 90% of Igvak sockeye harvests are Chignik bound fish is overly conservative; all samples showed substantially lower contributions of Chignik-bound sockeye to the Igvak harvests.
- Board of Fisheries proposals to alter metrics guiding the Cape Igvak Salmon Management Plan are not well supported by available data.
- The long-standing Cape Igvak plan appears to be working well in terms of limiting harvest of Chignik origin sockeye through harvest guarantees to Chignik, and meeting escapement goals for early and late runs of Chignik sockeye.



Cape Igvak Salmon Management Plan

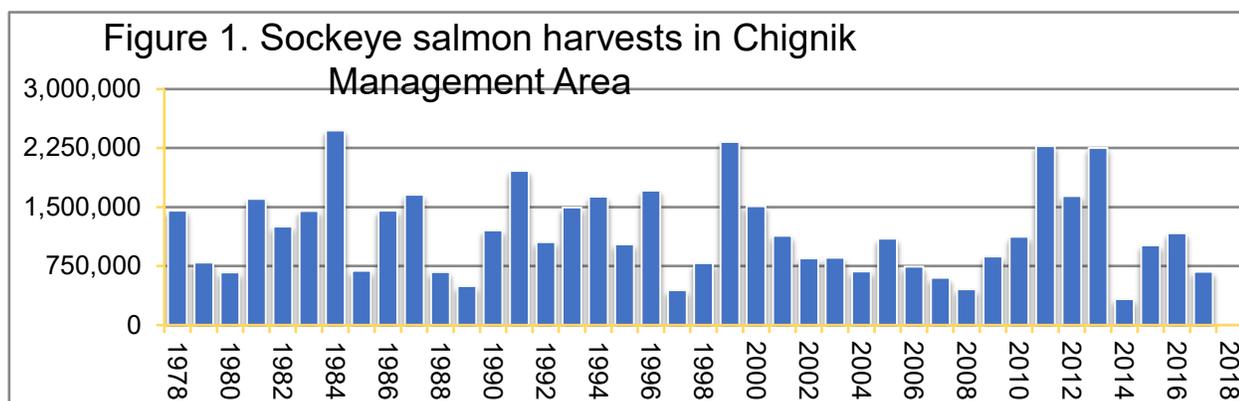
A purse seine fishery has been active along capes in the Cape Igvak section of Kodiak Management Area (KMA) since 1964. Following a tagging study in 1969 (ADFG, unpub. data) where 84% of released tags were recovered in Chignik Area fisheries, periodic modifications to the fishery were directed by the Alaska Board of Fisheries. In 1978, the Cape Igvak Salmon Management Plan (CISMP) was adopted to restrict harvest of Chignik bound sockeye at Cape Igvak. The fishery is one of two in the state (the other is the Southeast District Mainland, Area M) in which harvest and escapement triggers from an adjacent management area (both Area L-Chignik) must be met before the fishery can open. From beginning of the fishing season to July 25, Chignik fishermen must harvest a minimum of 600,000 sockeye salmon (300,000 from both early and late Chignik runs) and adequate escapements for both runs must be projected to occur before harvest will be allowed in Igvak. KMA fishermen at Cape Igvak are allocated 15% of the total Chignik harvest. The Board stipulates that 90% of the harvest at Igvak and 80% of the harvest in Southeast District Mainland (Area M) are Chignik bound fish (Anderson et al., 2019, Wilburn, 2019). Proposals to the Board for the 2020 Kodiak Management Area focus on specific metrics in the plan.

Since the CISMP plan came about, management has been very effective at meeting the allocation objectives in the plan. Only four times in forty years has the 15% target been exceeded by more than 1% (Anderson et al., 2019), which is probably within reasonable expectations for management error. Harvests of Chignik bound fish at Igvak obviously go up and down with Chignik harvests and the Igvak fishery has been closed, or catches extremely low, three times between 2014 and 2018 due to poor



runs and lower harvests in Chignik. On the other hand, Igvak sockeye harvests were much more robust in 2011 and 2013 when Chignik sockeye harvests exceeded 2 million sockeye (Anderson et al., 2019). While Chignik sockeye harvest was essentially zero for 2018, the forty year history shows wide fluctuations, with two of the lowest and two of the highest harvests occurring in the past ten years (Figure 1). Average Chignik sockeye harvests between 1998 and 2018 were about 15% lower than harvests in the previous two decades, 1978-1997. However, three of four harvests over 2 million fish were also in the most recent two decades (Figure 1).

The management plan has also been effective from a conservation and sustainability standpoint. Early and Late sockeye runs to Chignik River have met or exceeded their respective escapement goals every year since 1980, until the run failure in 2018, when the early Chignik sockeye run



failed to meet the escapement goal (Munro, 2019).

Recent Genetics Studies in Igvak Section

In the recent fishery genetic stock identification study in KMA, Shedd et al. (2016) added two sampling strata (early and middle) for Cape Igvak Section in each of the three study years, 2014-2016. No Igvak samples



were taken in 2014 because low Chignik harvest numbers kept the area closed to commercial harvest. In 2015, only the July stratum (middle) was sampled as Igvak was again closed in June due to inadequate sockeye harvests in Chignik Management Area. Harvest of Chignik fish in Igvak was estimated as 2,059 fish (total harvest 6,595) in the middle stratum, 2015. In both 2014 and 2015, the management plan had its intended effect of keeping Igvak closed or limited when Chignik harvests were low. In 2016, with a stronger Chignik run, an estimated 114,412 Chignik sockeye were harvested in the early (June) stratum. An estimated 10,006 Chignik bound sockeye were harvested at Igvak in July (Shedd et al., 2016).

While it is clear that Chignik fish were captured at Igvak in both years, with only three temporal strata sampled over a three year period, including a single datum for early strata harvests, specific conclusions about patterns of presence, magnitude or vulnerability of Chignik bound fish in Igvak fisheries are unwarranted. The single early (June) stratum sampled from the three year period estimated harvest of Chignik bound sockeye an order of magnitude larger than the two middle stratum harvests from 2015 and 2016. These data emphasize wide variation for Chignik bound sockeye harvests at Cape Igvak, and do not support substantive changes to the current management plan.

Data in Shedd et al. (2016) also does not support the presumption in the management plan that 90% of sockeye salmon harvests in Igvak are Chignik bound fish. The single middle stratum (July) estimate from 2015 found 31.2% Chignik sockeye from a total harvest of 6,595. The middle stratum estimate from 2016 was much lower, where only 5.6% of the sampled harvest were Chignik fish (total harvest 177,315). The sole early stratum (June) contribution in 2016 was much higher, estimating 74.1% of



Igvak harvests were Chignik origin (total harvest 154,318), but still did not reach 90%. The assumption that 90% of Igvak harvests are comprised of Chignik bound fish is very uncertain. Other genetic studies suggest uncertainty for similar assumptions in Southeast District Mainland (SEDM, Area M) fisheries, where Chignik bound sockeye are thought to represent 80% of sockeye harvested. Dann et al., (2012), showed that the overall proportion of Chignik bound fish harvested in SEDM was very consistent in 2010, 2011, and 2012 at 65%, 67% and 66% respectively, excluding the Northwest Stepovak Section in July.

Board of Fisheries Proposals

There are five proposals before the board which address the Cape Igvak fishery. Four of these seek to more severely curtail the fishery through specific alterations to metrics of the management plan. They propose completely eliminating fishing at Igvak prior to July 8 (proposal 58), lowering the board approved allocation of Chignik bound fish to KMA fishermen at Igvak from 15% to 5% (proposal 60), or dramatically raising Chignik harvest thresholds upon which Igvak fishery openings are predicated (proposal 61). A fourth proposal suggests that accounting practices for total Chignik harvest be changed such that harvests in Southeast District Mainland (Area M) and Igvak are no longer considered part of the Chignik total harvest. None of these proposals provide credible, data-driven justification for changing longstanding management plans. Recent genetic stock identification results reflect very limited sampling at Cape Igvak (Shedd et al. 2016) and as a result, insight regarding harvest patterns of Chignik sockeye in Igvak fisheries is narrow. There is no doubt that stock composition and harvest estimates are accurate and precise, but



only three strata in two different years were analyzed, where estimated harvest numbers of Chignik bound fish at Igvak were an order of magnitude different between them.

- **Proposal 58** would close Cape Igvak to fishing until July 8, based on increases in KMA harvests and declines in Chignik harvests. However, Chignik fish represented a relatively minor component of Westside KMA harvests sampled in Shedd et al. (2016) and there is no data linking historical harvests in KMA to Chignik harvests. Increases in KMA sockeye harvests over the years most-likely resulted from greater harvests of local sockeye stocks and sockeye from enhancement efforts by Kodiak Regional Aquaculture Association, which averaged about 345,000 during 2008 - 2017 (Anderson et al., 2018). Though Chignik suffered a run failure in 2018, long term average harvests during 1998-2018 are only 15% smaller than those from 1978-1997.
- **Proposal 59** seeks to change fishery accounting practices in CISMP by eliminating SEDM and Cape Igvak harvests from the total Chignik sockeye harvest, for allocation purposes within the plan. Currently 80% of sockeye harvested in most areas of SEDM and 90% of sockeye in Igvak are assumed part of total Chignik harvest. The effect of this is that allocation percentages would be reached sooner and harvests at Cape Igvak would be smaller. If the management plan assumes a specific percentage of Chignik origin fish in SEDM or Igvak, it must be included in



allocative accounting. It would be inappropriate to address only Igvak with such a proposal.

- **Proposal 60** would lower the allocation percentage of Chignik sockeye to Cape Igvak fishermen from 15% to 5% supposedly because at the inception of the management plan, KMA sockeye harvests were weak and Chignik harvests were robust, and now the situation is reversed. While KMA sockeye harvests have improved since 1978 due to local stock performance and enhancement efforts, there is no evidence that any declines of CMA sockeye harvests are tied to Cape Igvak sockeye harvests. Chignik harvests show wide variation since 1978 as many salmon systems do. Two of the highest and two of the lowest Chignik area sockeye harvests have occurred during the last decade (Figure 1). This proposal would significantly reduce harvest in Kodiak's longstanding fishery at Cape Igvak without justification.
- **Proposal 61** would raise harvest thresholds for the early and late Chignik run combined from 600,000 to 1,000,000 sockeye before Igvak could open and guarantee a harvest of 1,000,000 sockeye to Chignik fishermen. The proposal would probably close the Igvak fishery. Justification is based on unstated changes in assumptions and economic conditions that have occurred since inception of the management plan. This is essentially the same proposal submitted to the Area M board meeting in 2019 to



severely curtail the SEDM fishery, which the Board of fisheries rejected.

Proposal 62 creates mandatory reporting for vessels entering or leaving Cape Igvak section. It is likely unworkable and ineffective for fisheries managers to perform this monitoring.

Literature Cited

Anderson, T.J., J. Jackson, B. A. Fuerst, and A. E. Dorner. 2019. Kodiak Management Area commercial salmon fishery annual management report, 2018. Alaska Department of Fish and Game, Fishery Management Report No. 19-17, Anchorage.

Dann, T. H., M. J. Witteveen, S. D. Rogers Olive, C. Habicht, M. B. Foster, H. L. Liller, and W. D. Templin. 2012. Genetic stock composition of the commercial harvest of sockeye salmon in Southeastern District Mainland, Alaska Peninsula Management Area, 2010–2012. Alaska Department of Fish and Game, Special Publication No. 12-31, Anchorage.

Munro, A. R. 2019. Summary of Pacific salmon escapement goals in Alaska with a review of escapements from 2010 to 2018. Alaska Department of Fish and Game, Fishery Manuscript Series No. 19-05, Anchorage.

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Wilburn, D. M. 2019. Chignik Management Area commercial salmon fishery harvest strategy, 2019. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report 4K19-09, Kodiak.

2019-2020 Board of Fish || Kodiak Finfish || Proposal 58



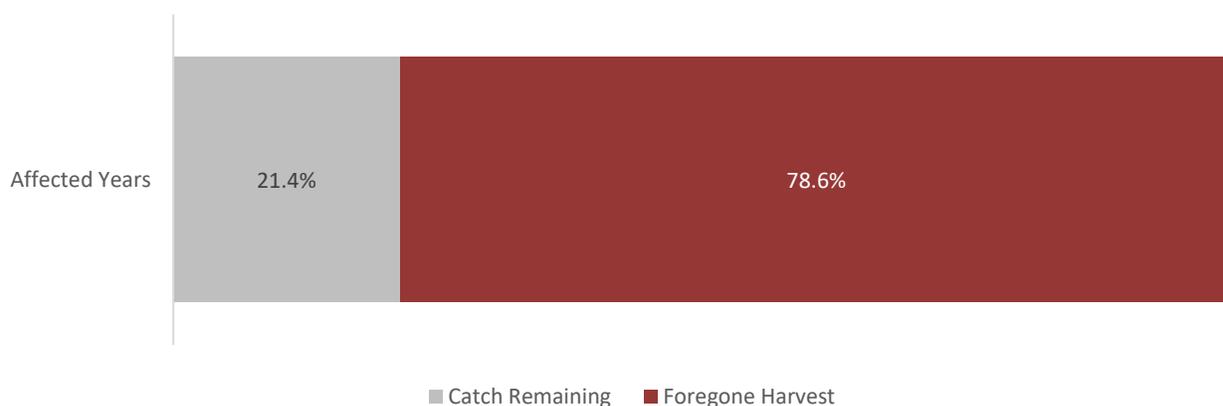
Key Findings

- Overall, proposed changes from Proposal 58 would result in an economic loss in the Kodiak Borough of almost three million dollars a year.
- On average, restrictions during the effected years would result in more than 75% of the current sockeye catch being eliminated.
- The complete implementation of proposal 58 would result in an average foregone harvest worth at least \$1.9 million ex vessel price per year among affected fishermen.
- Direct loss of foregone sockeye harvest per year ranges from \$140,000 to \$6.25 million over the time period examined (1998-2019). The mean foregone sockeye harvest is valued at \$1.89 million per year, using each year's prices.
- Sockeye loss per permit holder affected ranges from \$3,000 to \$79,000 per year (mean \$27,000), depending on number of affected fishermen and count of foregone sockeye harvest.
- Total foregone harvest among all species is estimated to be 1.58 million pounds per year worth an average of \$1.99 million per year, using each year's prices. Average loss per affected permit holder estimated to be \$28,000 per year.
- Species specific foregone harvest ex vessel price estimated to range between \$0 (coho) to \$6.25 million (sockeye) per year.

**\$2.99 Million Dollars
Annual Economic Loss in
the Kodiak Borough**

**\$1.99 Million Dollars
Yearly Direct Loss to
Fishermen**

Average Revenue Loss Per Year





Methodology and Data Sources

Background

The 2019-2020 Board of Fish, Kodiak Finfish Proposal 58 proposes to amend the Cape Igvak Management Plan to restrict all commercial salmon fishing in the Cape Igvak Section before July 8th and until after the Chignik area sockeye harvest exceeds 300,000. The Chignik area includes all sockeye harvest in the Chignik Management Area, 80% of sockeye harvest in East Stepovak, Southwest Stepovak, Stepovak Flats, Balboa Bay, and Beaver Bay Sections and 90% of sockeye harvest in Cape Igvak.

Proposal 58 is only focused on the Cape Igvak section, Kodiak Mainland District.

Link to Proposal:

<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2019-2020/proposals/58.pdf>

Data Sources

Foregone harvest days count and pound data was provided by the State of Alaska, Department of Fish and Game daily harvest reports. Price data for 1998-2018 was provided from the State of Alaska, Department of Fish and Game *Commercial Operator's Annual Reports* (COAR). 2019 price data was not available through the COAR report at the time of this analysis. 2019 price data is estimated from the five-year average of the reported 2014-2018 price per pound per species (see methods below). Multipliers for indirect and induced economic impact were commissioned from the US Department of Commerce, Bureau of Economic Analysis specifically for the Alaska commercial fishing industry. Inflation rates are provided from the US Department of Labor, Consumer Price Index. Tax information is from the State of Alaska, Department of Revenue and the Kodiak Borough.

Data Methods

Economic impact is estimated using historical harvest data from 1998-2019. Proposal 58 applies to all gear types and all gear harvest totals used in estimating impact. For the period prior to July 8th, no fishing occurred in Cape Igvak in 1998, 2008-2009, 2014-2015, and 2018-2019.

Proposal 58 would be in effect prior to July 25th for all years, including a total closure of the Cape Igvak fishery prior to July 8th. Additional restrictions would be in place dependent on Chignik sockeye harvest totals (under proposal 58, 90% of the Cape Igvak sockeye harvest is counted towards this value. Under BOF proposal 59, none of the Cape Igvak or Southeast Mainland District is counted towards this total). Total harvest counts in the Cape Igvak section were aggregated across days of closure (prior to July 8) for each year.



Additional closures would be in effect for a total of 10 days in 2003 and 2004 as the 300,000 minimum Chignik area harvest were not met.

The value of foregone harvest is calculated as species-specific foregone harvest pounds multiplied by species-specific Kodiak area price per pound for each year. Foregone harvest counts and economic impact are calculated for Cape Igvak as a whole. The number of permit holders affected by proposal 58 is calculated as the maximum number of unique permits during the closure period in harvest records.

Species specific prices per pound for each year between 1998-2018 were obtained from the Fish Game COAR for each individual year. The total net weight in the Kodiak area for each species for each season is divided by the respective net value.

Final 2019 COAR price per species data is not available. Species specific price for 2019 was estimated as a five-year average of available COAR data (2014-2018). Verification of 2019 data with the KSWG provided spreadsheets using Icicle, Ocean Beauty, and Pacific season prices for 2017-2019 compared to COAR for 2017, 2018. The spreadsheet values varied from published COAR by both higher and lower values up to 20%. The five-year average was much closer to 2017 and 2018 prices than the spreadsheet averages and weighted averages for respective years. The sockeye 2019 season price per pound estimate may be biased downwards given the processor spreadsheet; the COAR numbers were up to 20% lower than provided spreadsheet, and the five-year average is 16% lower than 2019 processor spreadsheet.

Indirect and induced economic loss was calculated from Regional Input-Output Modeling System (RIMS II) type I and type II multipliers. These take into account increase (in this case local loss) in regional economic activity due to change in industry specific earnings. For this report, the fisheries industry specific multipliers were used. Selected industry multipliers are specific to Alaska.

All values are adjusted for inflation and shown in 2019 dollar values.



Results & Data Tables

Direct Losses

On average, in the years effected by Proposal 58, more than 75% of the current catch would be restricted. From year 1998-2019, more than 55% of the harvestable catch would be foregone. Overall, these changes would result in an economic loss to the Borough of almost three million dollars a year.

\$1.99 Million Dollars Yearly Direct Loss to Fishermen	Direct revenue lost to the Kodiak Borough per year:	
	Direct loss per affected year:	\$1.99 Million
\$2.99 Million Dollars Annual Economic Loss in the Kodiak Borough	Loss from sockeye fishery:	\$1.89 Million
	Fisheries employment impact:	17.6 jobs per year
	All employment impact:	22.1 jobs per year
	Indirect community loss:	\$414,120
	Induced community loss:	\$583,478
	Total Annual Borough Loss:	\$2,992,397

Proposal 58 would have impacts throughout the Kodiak Borough. The direct loss to fishermen would be \$1.99 million per year. Of the total loss to the fishery, the limitation on the sockeye fishery comprise the majority of the impact, accounting for \$1.89 million of the loss with \$100,000 of the total loss distributed among other salmon species.

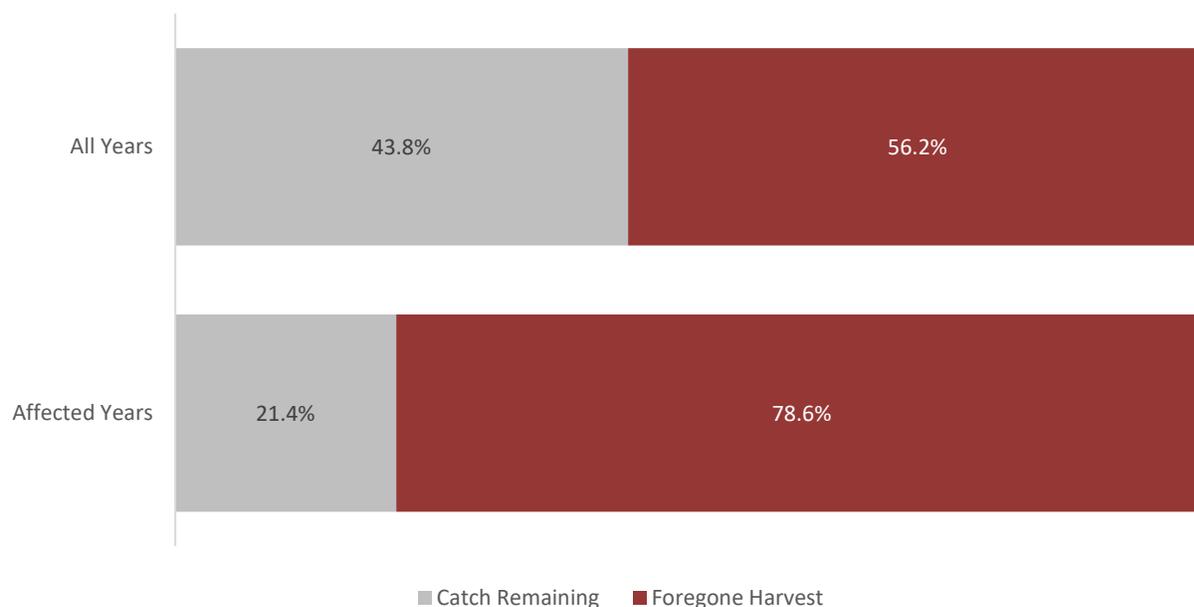
The direct impact of this proposal will result in a loss of 17.6 fisheries specific jobs and a total of 22.1 jobs overall in the Kodiak Borough per year. In addition to the direct loss impact of \$1.99 million, there is a further indirect loss of \$414k as a result of lost business to business economic activity for the community from purchases such as fuel, gear, and supplies. There is an additional \$583k of induced loss in the community resulting from the lost direct and indirect economic activity (total \$2.40 million) and reduced labor market. This impact results in a total loss to the community from direct, indirect, and induced losses of \$2.99 million dollars per year.



Fisheries Loss

On average, restrictions during the effected years would result in more than 75% of the current catch being eliminated. For all years, including six unaffected years, the average revenue loss to the community would be more than 55%.

Chart 1: Average Revenue Loss Per Year



Over the last 22 years 1998-2019, there have been 10 years where the fisheries losses from these increase restrictions would result in a loss of more than one million dollars of foregone ex vessel value to the fishery. Six of the previous 22 years would be unaffected by the proposal changes. Fishing was severely restricted in 2018 due to historically low run returns.

The sockeye fishery would experience ex vessel losses of more than \$1 million for nine of the 15 affected years.



Chart 2: Total Fishery Loss 1998-2019

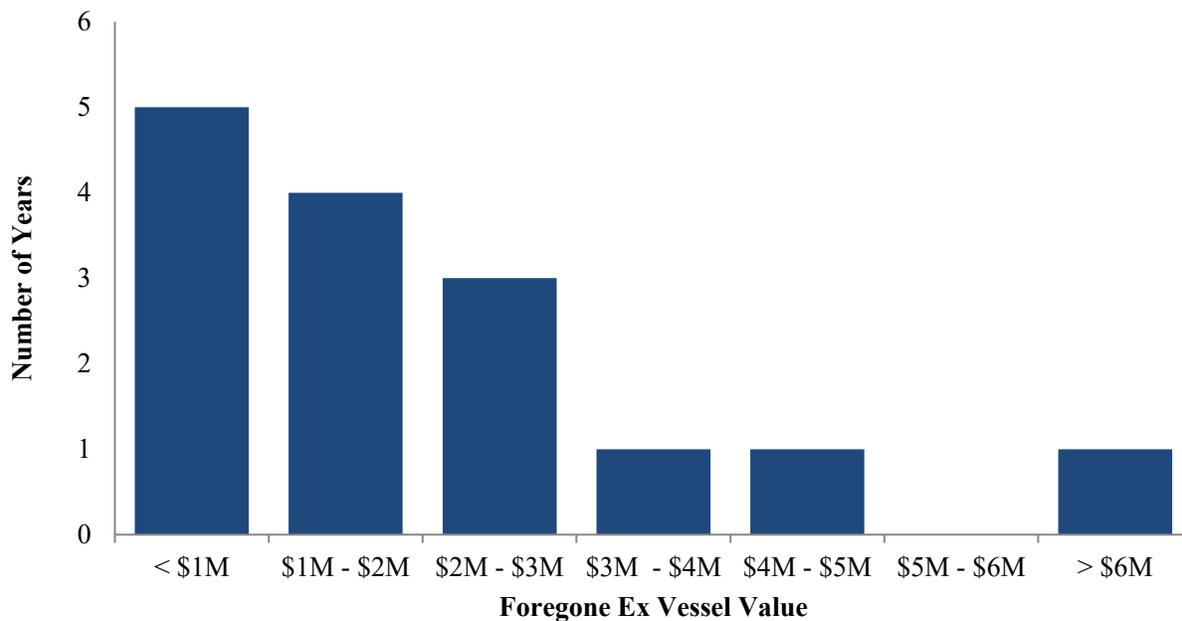
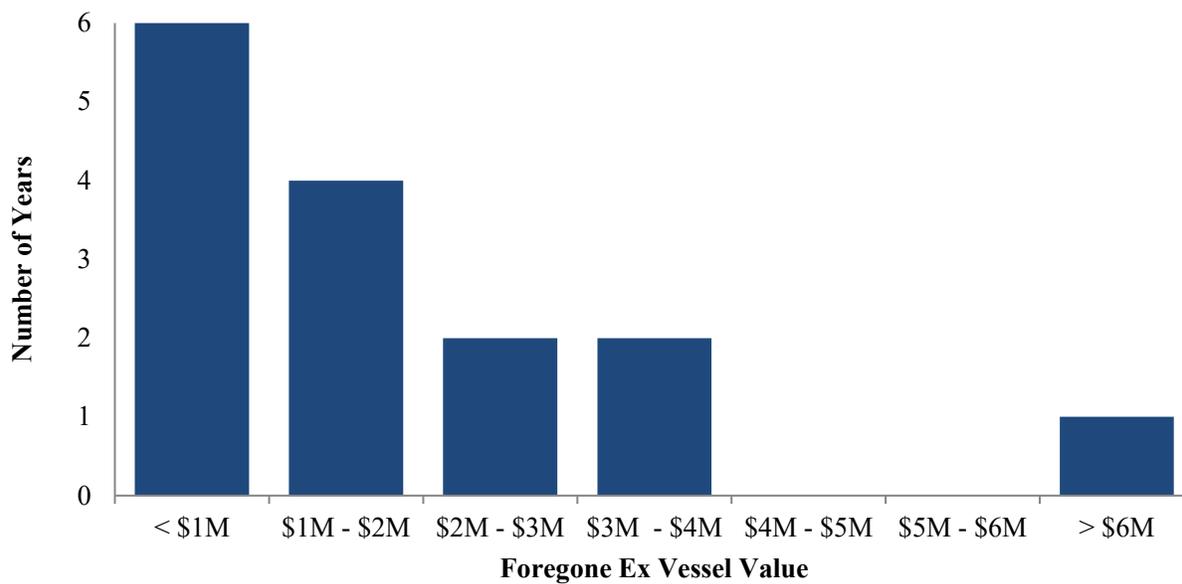


Chart 3: Total Sockeye Loss





The mean direct loss for all species per year is \$1,994,798 with a median loss of \$1,331,454. If these restrictions were in place the greatest impact would have been in 2011 with a loss of \$6,659,154 and the least impact would have been in 2006 with a loss of \$168,071.

Table 1: Direct Loss of Proposal 58 Implementation

Year	Direct Loss All Species	Direct Loss Sockeye
1998	No Impact	
1999	\$3,508,007	\$3,442,997
2000	\$2,360,808	\$2,323,611
2001	\$1,024,685	\$962,626
2002	\$848,667	\$799,675
2003	\$688,343	\$631,512
2004	\$898,710	\$869,284
2005	\$2,217,289	\$1,975,671
2006	\$168,071	\$139,644
2007	\$505,519	\$448,390
2008	No Impact	
2009	No Impact	
2010	\$1,709,608	\$1,622,292
2011	\$6,659,154	\$6,253,079
2012	\$2,731,307	\$2,586,591
2013	\$4,003,809	\$3,941,638
2014	No Impact	
2015	No Impact	
2016	\$1,266,541	\$1,159,328
2017	\$1,331,454	\$1,198,552
2018	No Impact	
2019	No Impact	
Mean	\$1,994,798	\$1,890,326
Median	\$1,331,454	\$1,198,552
Min	\$168,071	\$139,644
Max	\$6,659,154	\$6,253,079



Table 2: Direct Loss of Proposal 58 Implementation Per Fishermen

	Average Loss Per Fishermen - All Species	Average Loss Per Fishermen - Sockeye Only
Mean	\$28,399	\$26,819
Median	\$22,272	\$21,921
Min	\$3,909	\$3,248
Max	\$84,293	\$79,153

Based on the number of active permits per year, individual fishermen would experience a mean direct loss for all species per year of \$28,399 with a median loss of \$22,272. If these restrictions were in place the greatest impact would have been in 2011 with a loss of \$84,293 per fishermen with the least impact in 2006 with an average loss of \$3,909.

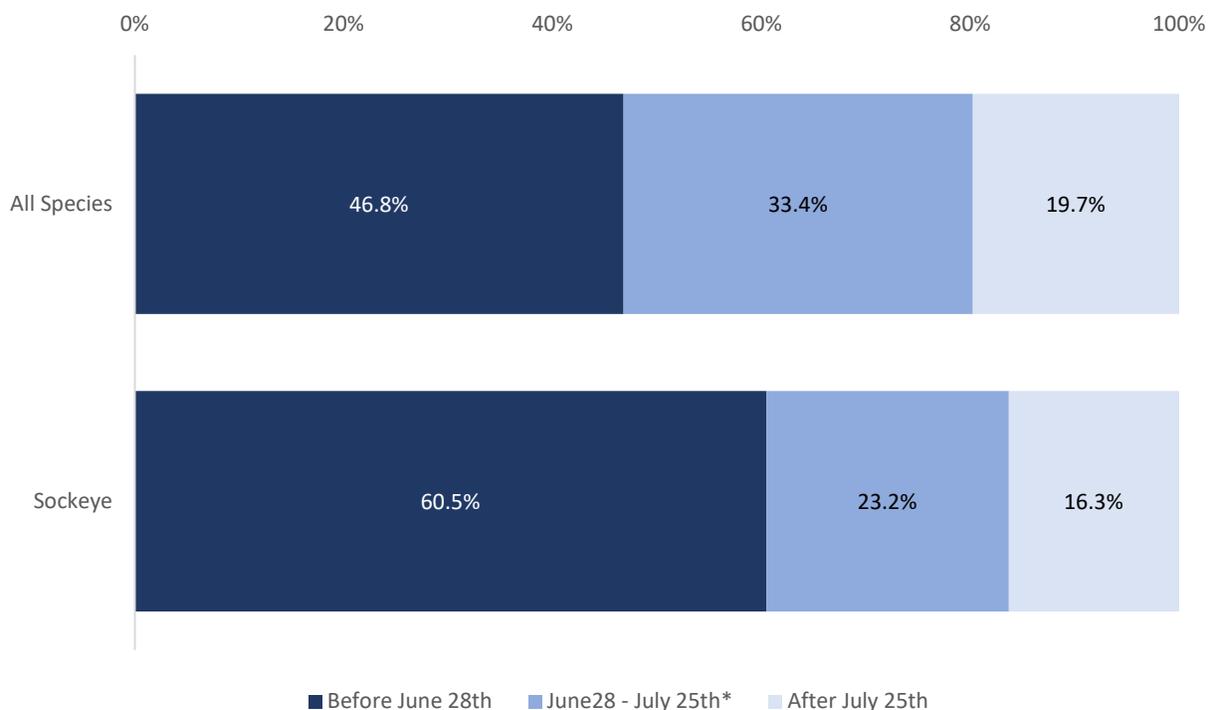
Table 3: Loss Per Affected Permit Holder

Year	Permits	Loss per Permit	Total Value Foregone Harvest	2019 Inflation Adjustment
1998	No Impact			
1999	104	\$33,731	\$2,272,025	\$3,508,007
2000	106	\$22,272	\$1,580,192	\$2,360,808
2001	57	\$17,977	\$705,220	\$1,024,685
2002	68	\$12,480	\$593,473	\$848,667
2003	78	\$8,825	\$492,377	\$688,343
2004	37	\$24,289	\$659,846	\$898,710
2005	71	\$31,229	\$1,683,590	\$2,217,289
2006	43	\$3,909	\$131,717	\$168,071
2007	32	\$15,797	\$407,348	\$505,519
2008	No Impact			
2009	No Impact			
2010	58	\$29,476	\$1,448,820	\$1,709,608
2011	79	\$84,293	\$5,826,032	\$6,659,154
2012	57	\$47,918	\$2,438,667	\$2,731,307
2013	72	\$55,608	\$3,626,639	\$4,003,809
2014	No Impact			
2015	No Impact			
2016	60	\$21,109	\$1,181,475	\$1,266,541
2017	78	\$17,070	\$1,269,261	\$1,331,454
2018	No Impact			
2019	No Impact			
Average		\$28,399	\$1,621,112	\$1,994,798



On average, the majority of sockeye and almost half of total catch (by weight) in Cape Igvak for each season is caught before June 28th. For this reason, the impact of proposal 58 (total closure of Cape Igvak before July 8th) is much higher than the impact of proposal 65 (closure between 6/28 and 7/25). Of note, no fishing occurred in Cape Igvak during any year (1998-2019) between June 28th and July 8th.

Chart 4: Average Total Weight Caught During the Season in Cape Igvak by Time Period



Foregone Tax Revenue

The foregone harvest due to proposal 58 implementation would have tax implications for state, borough, and city budgets. The state implements two relevant taxes in the region: the fisheries business tax (which is shared with local governments) and the salmon enhancement tax (SET). Fisheries business tax rates vary by type of processing activity and the proportion of each is estimated from the State of Alaska's Annual Tax Report for FY18. The salmon enhancement tax rate is 2% in the Kodiak region. The Borough implements a resource severance tax of 1.075% and receives a share of the fisheries business tax from the state. The local city governments also receive a share of the fisheries business tax from the State of Alaska. Borough and city shares of the fisheries business tax estimated from the Borough's FY18 annual tax report.

The implementation of proposal 58 would result in average yearly tax losses of \$72,000 to the State of Alaska, \$32,000 to the Kodiak Borough, and \$10,000 to Kodiak City.



State Taxes

Fisheries Business Tax (50% Share)	\$32,326
SET Tax	\$39,896
Total	\$72,222

Borough

Resource Severance Tax	\$21,444
Fisheries Business Tax (Share of 50%)	\$10,322
Total	\$31,766

Cities

(Share of Fisheries Business Tax)

Akhiok	\$2,409
Kodiak	\$9,620
Larsen Bay	\$2,407
Old Harbor	\$2,585
Ouzinkie	\$2,498
Port Lions	\$2,484
Total	\$22,003



Loss by Species

Table 4: Sockeye Foregone Harvest

Year	Foregone Harvest - lbs	Sockeye Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	2,063,865	\$1.08	\$2,229,920	\$3,442,997
2000	1,739,030	\$0.89	\$1,555,295	\$2,323,611
2001	943,979	\$0.70	\$662,509	\$962,626
2002	909,868	\$0.61	\$559,213	\$799,675
2003	748,823	\$0.60	\$451,726	\$631,512
2004	976,581	\$0.65	\$638,241	\$869,284
2005	1,869,704	\$0.80	\$1,500,130	\$1,975,671
2006	130,411	\$0.84	\$109,438	\$139,644
2007	361,799	\$1.00	\$361,314	\$448,390
2008	No Impact			
2009	No Impact			
2010	969,922	\$1.42	\$1,374,824	\$1,622,292
2011	3,584,803	\$1.53	\$5,470,760	\$6,253,079
2012	1,568,290	\$1.47	\$2,309,456	\$2,586,591
2013	1,961,485	\$1.82	\$3,570,324	\$3,941,638
2014	No Impact			
2015	No Impact			
2016	847,930	\$1.28	\$1,081,462	\$1,159,328
2017	755,297	\$1.51	\$1,142,567	\$1,198,552
2018	No Impact			
2019	No Impact			
Total	19,431,787		\$23,017,180	\$28,354,890

Table 5: Chum Foregone Harvest

Year	Foregone Harvest - lbs	Chum Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	170,112	\$0.19	\$31,572	\$48,747.61
2000	92,806	\$0.22	\$20,153	\$30,108.15
2001	83,888	\$0.32	\$26,773	\$38,900.99
2002	137,679	\$0.16	\$22,253	\$31,821.74
2003	166,509	\$0.14	\$23,184	\$32,410.91
2004	125,877	\$0.12	\$15,458	\$21,053.48
2005	185,393	\$0.20	\$37,447	\$49,318.10
2006	50,260	\$0.33	\$16,799	\$21,436.08



2007	103,667	\$0.35	\$36,489	\$45,283.38
2008	No Impact			
2009	No Impact			
2010	109,744	\$0.56	\$61,481	\$72,547.59
2011	455,032	\$0.69	\$314,002	\$358,904.81
2012	184,103	\$0.60	\$110,888	\$124,194.16
2013	169,242	\$0.25	\$42,981	\$47,450.60
2014	No Impact			
2015	No Impact			
2016	195,096	\$0.34	\$65,775	\$70,510.56
2017	132,879	\$0.57	\$76,223	\$79,958.03
2018	No Impact			
2019	No Impact			
Total	2,362,287		\$901,478	\$1,072,646

Table 6: Pink Foregone Harvest

Year	Foregone Harvest - lbs	Pink Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	7,134	\$0.14	\$1,006	\$1,553
2000	19,270	\$0.14	\$2,771	\$4,139
2001	69,962	\$0.12	\$8,304	\$12,066
2002	104,486	\$0.09	\$8,984	\$12,848
2003	136,662	\$0.09	\$12,000	\$16,776
2004	22,668	\$0.10	\$2,174	\$2,961
2005	1,084,704	\$0.12	\$130,269	\$171,564
2006	11,709	\$0.16	\$1,916	\$2,445
2007	20,788	\$0.18	\$3,750	\$4,654



2008	No Impact			
2009	No Impact			
2010	19,416	\$0.44	\$8,446	\$9,967
2011	48,944	\$0.47	\$22,780	\$26,038
2012	29,660	\$0.48	\$14,147	\$15,844
2013	15,872	\$0.42	\$6,716	\$7,415
2014	No Impact			
2015	No Impact			
2016	55,585	\$0.47	\$26,237	\$28,126
2017	113,573	\$0.43	\$48,638	\$51,021
2018	No Impact			
2019	No Impact			
Total	1,760,433		\$298,138	\$367,416

Table 7: Coho Foregone Harvest

Year	Foregone Harvest - lbs	Coho Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	0	\$0.41	\$0	\$0
2000	0	\$0.49	\$0	\$0
2001	62	\$0.24	\$15	\$22
2002	10,920	\$0.18	\$20	\$28
2003	5,693	\$0.20	\$1,138	\$1,591
2004	29	\$0.27	\$8	\$11
2005	341	\$0.42	\$143	\$189
2006	14	\$0.66	\$9	\$12
2007	36	\$0.60	\$22	\$27
2008	No Impact			



2009	No Impact			
2010	116	\$0.80	\$92	\$109
2011	120	\$0.82	\$98	\$112
2012	7	\$0.77	\$5	\$6
2013	0	\$0.72	\$0	\$0
2014	No Impact			
2015	No Impact			
2016	227	\$0.78	\$178	\$191
2017	52	\$0.84	\$43	\$46
2018	No Impact			
2019	No Impact			
Total	17,617		\$1,772	\$2,342

Table 8: Chinook Foregone Harvest

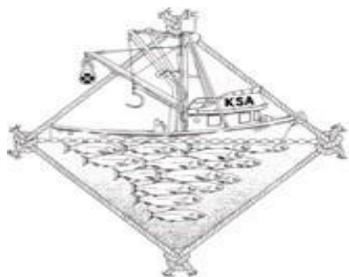
Year	Foregone Harvest - lbs	Chinook Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	13,994	\$0.68	\$9,527	\$14,710
2000	2,980	\$0.66	\$1,974	\$2,949
2001	10,589	\$0.72	\$7,619	\$11,071
2002	8,155	\$0.37	\$3,003	\$4,295
2003	12,202	\$0.35	\$4,330	\$6,053
2004	7,700	\$0.51	\$3,965	\$5,400
2005	20,508	\$0.76	\$15,601	\$20,547
2006	3,792	\$0.94	\$3,554	\$4,535
2007	6,479	\$0.89	\$5,774	\$7,165
2008	No Impact			
2009	No Impact			



2010	6,169	\$0.64	\$3,977	\$4,692
2011	20,535	\$0.90	\$18,391	\$21,021
2012	6,866	\$0.61	\$4,171	\$4,671
2013	11,504	\$0.58	\$6,618	\$7,306
2014	No Impact			
2015	No Impact			
2016	8,635	\$0.91	\$7,823	\$8,386
2017	2,337	\$0.77	\$1,789	\$1,877
2018	No Impact			
2019	No Impact			
Total	142,445		\$98,116	\$124,679



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615



December 12, 2019

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

RE: **Opposition to Proposal 59**

Dear Chairman Morisky and Board of Fish Members:

The Kodiak Seiners Association requests that you **reject Proposal 59** as it is written. This proposal, which has been repeatedly rejected by the Board of Fisheries including in 2017, is designed to conceal an allocation reduction of harvest in the Cape Igvak area, while proposing to fix a problem that doesn't exist. Kodiak fishermen have consistently averaged 20% *below* their allocation of Chignik bound sockeye as conservative management practices ensure that harvest overages are rare. Additionally, there is no indication that harvest overages in area M have ever led to overharvest in the Kodiak area. Area M fishermen are provided with a historical allocation of 6.5% of Chignik Bound fish, so that even if they were to harvest double their share, Kodiak's 15% percent allocation of the overage would only result in a temporary harvest goal that is less than 1% higher than it otherwise would be, which isn't nearly enough to overcome the typical 20% that the Kodiak fleet typically leaves on the table.

KSA hopes the Board understands the allocative implications of the change to the harvest equation in the proposal. Please see our comments on proposals 58 and 60 both of which address the allocative aspects of the fishery. This isn't an innocent "housekeeping" proposal but instead would result in significant loss of harvest opportunity in the Kodiak Management Area. If the Board finds cause to change the algebraic structure of how Kodiak's allocation is calculated in order to base harvest at Cape Igvak exclusively on harvest in the Chignik area then the new equation must be formulated to have no impact on the net sockeye allocation to the Kodiak fleet.

KSA respectfully requests the **Board reject proposal 59**. We thank you for the opportunity to comment on behalf of the membership of KSA. We appreciate the scientific and factual creation of regulations regarding our fisheries and trust that the Board continue to apply consistency in designing regulation changes while applying the guiding BOF policies, such as the Management for Mixed Stock Salmon Fisheries.

Kodiak Seiners Association represents 157 members, including the majority of actively fishing SO1K seine permit holders, Kodiak and Homer-based businesses, and individual crewmembers. Our focus is advocacy for our membership through positive interactions with ADF&G, the Board of Fisheries, and our State Legislature.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nate Rose'.

Nate Rose, KSA President



December 24, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

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

RE: Opposition to proposal 59

Dear Chairman Morisky and board of fisheries members,

I operate my own salmon seine vessel in the Kodiak fishery and I oppose proposal 59 that would shift the allocation of sockeye salmon in the Cape Igvak management section from Kodiak to Chignik. I raised our family on the back deck of our seiner and continue to support our family in the Kodiak salmon seine fishery.

Proposal 59 asks the board to change what catch of Chignik bound sockeye make up the Chignik sockeye salmon catch by excluding two areas of Chignik bound sockeye harvest from the total catch number that the 15% Igvak allocation is based on. This is nothing more than an allocation shift from Kodiak to Chignik without any rationale for an allocation shift. When asked "What is the issue you would like the board to address and why" the proposer does not mention anything about the necessity of an allocation shift to Chignik which is all this proposal would do.

The Igvak management plan has been in place since 1978 making it one of the oldest allocative management plans in the state. The plan restricted the Kodiak fishery in the Cape Igvak section from equal fishing time with Chignik to as close to 15% of the Chignik harvest of sockeye as possible with Chignik sockeye harvest level triggers to protect stocks and the Chignik fishery in times of low abundance. The fact that Kodiak has only fished two out of the last six years in the Igvak section shows that this plan is working well. The board has been asked numerous times in the past to change the allocation in the Igvak section towards Chignik and each time has applied their Allocation Criteria, Mixed Stock Fisheries Policy, and Sustainable Salmon Policy and each of the numerous times has determined that the plan is working well as written. There is no data that I know of that would justify shifting the allocation of sockeye salmon from Kodiak to Chignik.



Given that this proposal is nothing more than an allocation shift that the proposer does not make any case to justify I kindly ask that you decline to adopt proposal 59.

Sincerely,

Matthew Alward



Nicholas Hoffman
PO Box 1212
Kodiak, AK 99615

12/24/19

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Oppose Proposal 59

Dear Chairman Moriskey and Board of Fish members:

I'm a young Kodiak salmon fisherman. I have been running a seine boat since 2011 as well as participating in Kodiak halibut, sea cucumber, cod jig, and tanner crab fisheries. I respectfully request the Board reject Proposal 59.

Historically Kodiak fishermen always catch less than the 15% allowable amount. This proposal assumes that Kodiak fishermen consistently exceed the 15% which isn't true. If the proposal passes, Kodiak would lose roughly a quarter of its current allocation.

I see no reason for the Board to make any changes to the Kodiak Salmon Management plan. Thank you for the opportunity to comment on the proposals and the chance for my voice to be heard. I look forward to the Board of Fish members getting to spend time in Kodiak and learn more about our town and fishing community.

I humbly request the Board reject Proposal 59.

Sincerely,

Nicholas Hoffman
F/V Relentless



December 26, 2019

Quinn Alward

60082 Clarice Way

Homer, AK 99603

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

RE: Opposition to proposal 59

Dear Chairman Morisky and board of fisheries members,

I have grown up seining in the Kodiak area with my family since I was 10 years old and it is a big part of who I am today 12 years later. I oppose proposal 59 that would shift the allocation of sockeye salmon in the Cape Igvak management section from Kodiak to Chignik.

Proposal 59 asks the board to change what catch of Chignik bound sockeye make up the Chignik sockeye salmon catch by excluding two areas of Chignik bound sockeye harvest from the total catch number that the 15% Igvak allocation is based on. This is nothing more than an allocation shift from Kodiak to Chignik without any justification for an allocation shift. When asked "What is the issue you would like the board to address and why" the proposer does not mention anything about the necessity of an allocation shift to Chignik which is all this proposal would do.

The Igvak management plan has been in place since 1978 making it one of the oldest allocative management plans in the state. The fact that Kodiak has only fished two out of the last six years in the Igvak section shows that the current plan in place is working well. The board has been asked numerous times in the past to change the allocation in the Igvak section towards Chignik and each time has applied their Allocation Criteria, Mixed Stock Fisheries Policy, and Sustainable Salmon Policy and each of the numerous times has determined that the plan is working well as written. There is no data that I have been presented that would justify shifting the allocation of sockeye salmon from Kodiak to Chignik.

Given that this proposal is nothing more than an allocation shift that the proposer does not make any case to justify, I kindly ask that you decline to adopt proposal 59.

Sincerely,

Quinn Alward



December 24, 2019

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

Re: Opposition to Proposal 59

Dear Chairman Morisky and Board of Fisheries Members,

I am Richard Roth, Kodiak salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife, three children and I reside in Homer, but fish in Kodiak. I own and operate the F/V Sea Tzar (I sold the F/V Kelly Girl this winter which I had fished for 9 seasons in Kodiak). We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before *any fishing at Igvak occurs*. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak.

The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits.

I ask that the Board reject proposal 59 and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,

Richard, Amanda, Stephanie, Noah, and Ranger Roth
F/V Sea Tzar
Homer, Alaska



December 19, 2019

Robert Fellows

266 E Bayview Ave.

Homer, AK. 99603

Alaska Board of Fisheries

Board Support Section

PO Box 115526

Juneau, Ak. 99811-5526

RE: Opposition to proposal 59

Dear chairman Morisky and Board of Fisheries members,

I have been a commercial salmon fisherman in the Kodiak area form 29 years. The Cape Igvak section is a historical part of the Kodiak salmon fishery. In years of a surplus return to the Chignik management area, being able to have an oppportunity to fish in the Cape Igvak section is important to trying to make a living fishing salmon in the Kodiak management area. I respectfully request the Board reject proposal #59

This proposal makes the assumption that it is common for Kodiak fishermen in the Cape Igvak section to exceed the 15% allocation. This is a false assumption. The historic average harvest from the Cape Igvak section is approximately 13%. The Cape Igvak management plan is a long-standing management plan that works well and has safeguards built in for years of weaker returns to the Chignik river system.

Sincerely,

Robert Fellows



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

Another allocative reduction proposal. Cape Igvak fisherman only harvest fish in Cape Igvak after specific escapement goals are met. They are not allowed to harvest in years of low abundance. 15% is way below the long term historical catch which was reduced and capped in 1978 at the 15% goal. This proposal seeks to reduce the percentage by 21% and has no justification.



RE: PROPOSAL 59 Modify the definition of the total Chignik sockeye salmon catch used to determine allocation percentages in the Cape Igvak Salmon Management Plan

December 24, 2019 Alaska Board of Fisheries Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 Re: Opposition to Proposal 59 Dear Chairman Morisky and Board of Fisheries Members, I am Steve Roth, Kodiak and Lower Cook Inlet salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife and I reside in Homer, but fish in Kodiak. I own and operate the F/V Sea Grace. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures. This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen. The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before any fishing at Igvak occurs. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state. If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak. The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits. I ask that the Board reject proposal 59 and not make any changes to the Cape Igvak Management Plan. Thank you for your careful consideration, Steve and Jenny Roth F/V Sea Grace Homer, Alaska



December 24, 2019

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

Re: Opposition to Proposal 59

Dear Chairman Morisky and Board of Fisheries Members,

I am William Roth, Captian of the F/V Sea Chantey. I own a Kodiak seine permit and have been fishing it for the lasat 5 years as well as working as crew since 2010, I rely mostly on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before *any fishing at Igvak occurs*. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak.

The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits.

I ask that the Board reject proposal 59 and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,

William and Kaytlen Roth
F/V Sea Chantey
PO BOX 1230
Homer AK
99603



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

The igvak area has been a historically important fishery for Kodiaks already struggling fleet. I think this is something we can't afford. Also Chignik is not limited on their intercept of our fish. My name is Aaron Nevin. Being born in Kodiak to a commercial fisherman father I grew up fishing salmon on his seiner. I have continued on in my currently twenty year long career to buy a permit and run his boat after retirement. The seining season usually accounts for the majority of my annual income and is incredibly important to my family.



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

Adam Barker 41584 Manson Drive Homer AK 99603 12/26/19 Chairman Reed Moriskey Alaska Board of Fisheries Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 RE: proposal 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of total Chignik sockeye salmon catch Dear Chairman Morisky and Members of the Board of Fish My name is Adam Barker, I'm a third generation fisherman who grew up fishing the waters of Kodiak Island starting in 1988 with my dad. I purchased my own boat/permit for Kodiak seining in 1999, I now have two children who now come out and fish with me in the summers. I also tanner crab in the winter. I respectfully request the board rejects Prop # 60. The proposal # 60 reducing the Cape Igvak allocation from 15% down to 5% is redundant. If the Chignik run is grim no one will be fishing in the Cape Igvak Section. I used to commercial seine as a deckhand in the Chignik area. The invisible line separating the two areas is fundamentally meaningless as "our fish" swim through their area and vice versa. The reduction in return of fish to the Chignik watershed is not due to percentages caught by Kodiak Seiners. It well may be ocean warming and other factors possibly detrimental to all our shared fisheries. Please reject this proposal as counterproductive to business as usual for the past 40 years of Fish and Game management. I hope the board continues to apply consistency in its application of the guiding policies such as the mixed stock fisheries policy, and the sustainable fisheries policy. Sincerely, Adam Barker



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

Dear Board of Fish Members, I am a second-generation Kodiak fisherman. My father started salmon fishing here in 1967, and I have setnetted since I was a toddler with my family, for my whole life. I took over the permit from my dad several years ago, and in 2016 finally bought the setnet operation from my parents outright. You may be wondering why a setnetter who has no ability to fish the Igvak area is even commenting on this proposal. This is because we are drastically affected by the mobile seine fleet. If they are limited in where they can fish, we find our central section of the Northwest Kodiak district becoming more and more crowded with fewer opportunities for all to harvest in the traditional manner. So it behooves me to pay attention and understand what's going on. In this proposal, we see just random numbers being thrown out for your consideration, but where is the data behind them? It seems as if they are drawn out of thin air. Remember, Cape Igvak is completely closed in years of low abundance. Statements in the proposal that changing the Cape Igvak Management Plan would better "align the Cape Igvak Management Plan with current fishery trends and economic realities" provide no data to back them up, and in fact the plan is one of the earliest and best examples of the board's Mixed Stock Fisheries Policy and the Policy for the Management of Sustainable Salmon Fisheries. As a lifelong fisherman with a previous generation of history in my consciousness, I have to add that climate change and the warming of the oceans and ocean acidification is something we are coming up against. Changes are happening and I feel like they are going to keep happening. For this reason I urge you to be very cautious and careful about changing management plans in response to fisheries "disasters." Who knows what disasters will happen next and if you build management plans in response to these rather than based on deep analysis of science and the history and all other elements of the proposal, you'll be setting dangerous precedents for your future decisions. Thank you for your consideration, Adelia Myrick



December 24, 2019

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

Re: Opposition to Proposal 60

Dear Chairman Morisky and Board of Fisheries Members,

I am Alex Roth, Kodiak and Lower Cook Inlet salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife and I reside in Homer, but fish in Kodiak. I own and operate the F/V Wandering Star. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before *any fishing at Igvak occurs*. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak.

The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits.

I ask that the Board reject proposal 60 and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,
Alex and Jaime Roth
F/V Wandering Star
Homer, Alaska



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

Bo Calhoun 57177 Zulu Ct. Homer, AK 99603 12/26/19 RE: Opposition to Proposal #60 Dear Chairman Morisky and Board of Fish members: I'm a third generation Kodiak salmon seiner. I was born and raised in Homer, AK and continue to live here. My wife and I hope to raise our two sons on our family seine boat in a healthy Kodiak salmon fishery. I respectfully request you reject Proposal #60. The changing of the traditional Cape Igvak allocation is unjustified. Sockeye runs around the whole state have suffered recently, including those in Kodiak. Basing a huge allocation shift on a short term and undefined notion that Kodiak stocks are "exponentially healthier" creates a dangerous precedent in managing naturally cyclical fisheries. Beyond that, Chignik permits remain 2.5 to 3 times the cost of Kodiak permits and over half the S01K permits in Kodiak go unfished. Both Kodiak and Chignik are suffering from the recent weakening in sockeye runs. That does not justify taking from one fishery and giving to the other. Please reject Proposal #60. Thank you for taking the time to read public comments. Sincerely, Bo Calhoun



Brad Marden
PO Box 2856
Homer, AK 99603

December 23, 2019

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

RE: opposition to Proposal 60

Dear Chairman Morisky and Board of Fish members:

I first participated in the Kodiak seine fishery for salmon in 2004. Since then, I've worked as a deckhand in various salmon, halibut, and herring fisheries throughout the state, before buying my own boat in 2012, followed by a Kodiak seine permit in 2013. Since then I have exclusively fished in Kodiak waters. I respectfully request the Board **reject Proposal 60**.

Proposals to reduce the Cape Igvak allocation are a perennial request at the Kodiak and Chignik finfish meetings, and have been consistently rejected by the board in the past, for good reason. The allocation of 15% of overall Chignik bound fish is based on a historical use of the regional salmon resource from before limited entry. Repeating the same requests year after year to change allocation does not make a compelling case to warrant a change. When Chignik salmon escapement is weak, Kodiak fishermen do not get any fishing opportunity at Cape Igvak- this is fair; it also seems fair that in years of Chignik salmon abundance Kodiak fishermen should get a chance to catch the historical allocation. The Cape Igvak fishery helps spread out our fleet and can be an important part of having a decent fishing season for Kodiak fishermen.

I am sure that the Board tires of endless testimony claiming that the fish of concern are "our fish being stolen by those guys over there". It seems that in my 15 years of commercial fishing in Alaskan waters, Kodiak salmon fishermen are often on the defensive, and during these 15 years sockeye harvest has trended downward and the fleet has consolidated. Rather than retaliate with countering proposals of our own, I ask that we maintain status quo and keep historical allocations and fishing opportunity at Cape Igvak. For this reason, I ask that you **reject Proposal 60**. I want to thank you for your service and I hope the Board continues to apply consistency in upholding Mixed Stock Fisheries Policy, and the Sustainable Fisheries Policy.

Sincerely,

Brad Marden



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

My name is Brian Mcwethy. I was born and raised in Kodiak. I live in Kodiak with my family and we all depend on my income. I fished with my father on his seiner growing up and now I own and operate a seiner. Salmon seining and Tanner crab fishing in Kodiak are currently our only sources of income. I plan to try and continue to fish the Kodiak waters and possibly my children will have the opportunity to. I hope the current and historical areas we fish aren't taken from us and the future generations of Kodiak. I strongly oppose proposal 60. This would take seriously harm my business plan that I rely on to support my family.



December 22, 2019

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

Re: Opposition to Proposal 60

Dear Chairman Morisky and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak, Alaska. I grew up fishing on my dad's boat and got my first crew job working for someone else two weeks after I graduated high school. I haven't missed a salmon season since. I bought into the fishing industry in 2011 with the purchase of a 25-foot jig boat that I worked for two years in the winter and spring months while I still crewed for salmon in the summer. Access to the jig fisheries focusing on cod and rockfish was the only way that I could afford to move into the salmon fleet with a 38-footer in 2013. After the recent cod collapse I now primarily rely on salmon seining and live here year-round with my wife.

There is no research or stock assessment that justifies the reduction of Kodiak's Cape Igvak fishery from 15% to 5%, nor any reduction in percentage for that matter. This proposal suggests a number pulled from thin air. There has been no change in the allocation criteria to justify needing a change in allocation. Kodiak's 15% allocation at Cape Igvak was an approximation of Kodiak's historical harvest in the years before the Cape Igvak management plan from 1978.

The proposer uses the justification that the Cape Igvak Management plan was created because Kodiak had weak sockeye stocks decades ago, and that now Chignik is showing weak sockeye stocks we should give up our historic fishing patterns in the Igvak section. From what I have learned that is not the historically accurate background for the Cape Igvak management plan. Furthermore, I simply do not accept their argument that Kodiak stocks and fishermen are doing fine. Salmon run strengths are cyclical and the trend of salmon abundance in Kodiak region mirrors the rest of the western Gulf of Alaska, where unpredictability coupled with some historically poor harvests have left the fleet and our communities uneasy about the future.

Chignik fishermen argue that they are in bad shape and that Kodiak fishermen are doing great and have plenty of opportunities. This is not the case. The Kodiak region is experiencing a contraction of our historic commercial fleet due to a suite of reasons, including ecological changes impacting available fisheries, barriers to entry for young people into ownership-level fishing careers, and high cost of permits/quota and difficulty of diversifying fishing portfolios. Around Kodiak the small boat fleet in the past relied on a four-legged stool of at least crab, herring, salmon and halibut. My dad who fished things ranging from JV Pollock to salmon seining on the Thelma C, the wooden boat that's now a museum piece down on the spit, always tells me how first crab went away and everything was still ok. Herring and halibut could balance out a bad salmon season. Then herring prices crashed and they were trying to balance on a two-legged stool. Then came the IFQs. Over the span of a generation, these factors have left many



fishermen struggling to balance on a precarious one-legged salmon stool. Most recently, the closure of the federal cod fishery has removed one of the wintertime support fisheries that we built our business on and now we're cripplingly reliant on salmon. We need this fishery to keep going on.

Taking away any fishing opportunity from Kodiak fishermen, particularly from the small boat fleet, would have a direct negative impact on new entrants trying to gain a foothold in this industry, fishing families trying to get by, and fishing support businesses in our region. I'm proud to call Kodiak home and am working to protect our fishing way of life.

Sincerely,
Chris Johnson
F/V North Star



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

Historical sockeye returns are cyclical and recently the Kodiak area return has been strong, however the Alaska Department of Fish and Game predictions for summer 2020 indicate that Chignik will have a stronger run than Kodiak next summer. Cutting off Kodiak fisherman in the Cape Igvak section while Kodiak area sockeye returns are dropping will severely harm the Kodiak salmon fleet.



December 22, 2019

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

Re: Opposition to Proposal 60

Dear Chairman Morisky and Board of Fisheries Members,

My name is Danielle Ringer and I appreciate the opportunity to comment on proposals before the Board at the Kodiak finfish meeting. I live in Kodiak with my husband and we own and operate the 38-foot F/V North Star. We chiefly rely on salmon seining and cod and rockfish jigging to maintain our fishing way of life and ability to live on Kodiak Island. I hold a Master's degree from the University of Alaska Fairbanks in Political Ecology of Fisheries and was one of the researchers on the Graying of the Fleet study in the Kodiak region.

There is no research or stock assessment that justifies the reduction of Kodiak's Cape Igvak fishery from 15% to 5%, nor any reduction in percentage for that matter. This proposal suggests a number pulled from thin air. There has been no change in the allocation criteria to justify needing a change in allocation. Kodiak's 15% allocation at Cape Igvak was an approximation of Kodiak's historical harvest in the years before the Cape Igvak management plan from 1978.

The proposer uses the justification that the Cape Igvak Management plan was created because Kodiak had weak sockeye stocks decades ago, and that now Chignik is showing weak sockeye stocks we should give up our historic fishing patterns in the Igvak section. From what I have learned that is not the historically accurate background for the Cape Igvak management plan. Furthermore, I simply do not accept their argument that Kodiak stocks and fishermen are doing fine. Salmon run strengths are cyclical and the trend of salmon abundance in Kodiak region mirrors the rest of the western Gulf of Alaska, where unpredictability coupled with some historically poor harvests have left the fleet and our communities uneasy about the future.

Chignik fishermen argue that they are in bad shape and that Kodiak fishermen are doing great and have plenty of opportunities. This is not the case. The Kodiak region is experiencing a contraction of our historic commercial fleet due to a suite of reasons, including ecological changes impacting available fisheries, barriers to entry for young people into ownership-level fishing careers, and high cost of permits/quota and difficulty of diversifying fishing portfolios. Around Kodiak the small boat fleet in the past relied on a four-legged stool of at least crab, herring, salmon and halibut. My husband's dad who fished things ranging from JV Pollock to salmon seining on the Thelma C, the wooden boat that's now a museum piece down on the spit, always tells us how first crab went away and everything was still ok. Herring and halibut could balance out a bad salmon season. Then herring prices crashed and they were trying to balance on a two-legged stool. Then came the IFQs. Over the span of a generation, these factors have left many fishermen struggling to balance on a precarious one-legged salmon stool. Most recently, the closure of the federal cod fishery has removed one of the wintertime support fisheries that we



built our business on and now we're cripplingly reliant on salmon. We need this fishery to keep going on.

Please do not accept Chignik's proposals seeking to hack away at Kodiak's salmon fishery. I see no biological, scientific, historical, economic, nor sociocultural reasons that could justify the Board making any changes to the Cape Igvak management plan and thus create ripple effects negatively impacting Kodiak fishermen, processing workers, and community businesses. Thank you for your consideration of my comments and I look forward Board of Fisheries members spending time in our fishing community during the Kodiak meeting.

I humbly request the Board to reject this proposal.

Respectfully,
Danielle Ringer, M.A.
F/V North Star



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

This is a bald face grab for fish based on a cyclical low point in Chignik sockeye runs in a historically proven management plan. The Board should not change a proven management plan based on emotional whim.



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

The mangement plan has worked fine since 1978. During years of high production Kodiak fisherman get openings. During years of low production there is few or no openings.



Fred Stager

F/V Lady Lu

December 12, 2019

Alaska Board of Fisheries Board Support Section

P.O. Box 115526 Juneau, AK 99811-5526

RE: Opposition to Proposal 60

Dear Chairman Morisky and Board of Fish Members,

I am writing to oppose Proposal 60: This proposal is simply an allocation grab purporting to solve a problem that doesn't exist.

The Cape Igvak management plan was first adopted in 1978 and has been repeatedly evaluated by the Alaska Board of Fisheries, making it one of the most long-standing and intensely scrutinized management plans in the state. This plan has stood the test of time and provided a reasonable allocation and harvest strategy for a fishery that stretches back well beyond the beginning of limited entry.

In years of abundance, Kodiak seiners are allowed to share in the harvest of Chignik bound sockeye, while in poor years the harvests are decreased or eliminated altogether. It is a sound plan that has stood the test of time and has provided the Kodiak fleet with a much needed source of June revenue.

How the proponents of prop 60 have concluded that Kodiak's salmon fishery is "exponentially healthier" than it used to be when we are well below the historical average for our sockeye harvest is a mystery to me.



I'm also frustrated in the unfairness in the how the shared resource is currently managed. Chignik fishermen are prosecuting an expanding mixed stock fishery on non-local stocks (see WASSIP), yet their fishing efforts have no restrictions that account for the impact that their harvest has on Kodiak's fishery. Meanwhile, Kodiak fishermen have endured 2 consecutive years of closures in the Cape Igvak for conservation.

I ask the board to **reject proposal 60** and recognize that Kodiak has not been somehow spared from regional trends in declining sockeye runs.

Thank You- Fred Stager



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

Dear Chairman and Members of the Board, As a young fishermen who is working their way into the Kodiak Salmon fishery this proposal will cause Kodiak fishermen to lose a substantial amount of their catch. I have been investing into the Kodiak salmon fishery as much as possible, in 2019 I purchased a Kodiak salmon permit. I ran a seiner for the month of august. I plan on running the same boat for the entire 2020 salmon season in Kodiak. When I was younger I remember testifying against proposals similar to these. These proposals are re-allocations of Kodiak historical catch. Kodiak has always had intercept fisheries and we already have management plans in place that have been effective for the Kodiak salmon fishery. Please help ensure the future for young fishermen entering into the Kodiak Salmon fishery, and the people who have been investing and are established in the fishery. Thank you for considering these comments, Garrett Kavanaugh



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

Dear Chairman Morisky and Board of Fish members: I am 31 years old and a life long resident of Kodiak. I grew up set netting in Uganik on the west side of the island with my mother until i was 14. I then started seining with my father until I was able to buy my own Kodiak seine operational the age of 27. Please oppose proposal 60 there is no need to change a management plan that has been used successfully since 1973. thank you for your time sincerely Iver Holm



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

I have been intimately involved in the Kodiak seine fishery since 1968 to present. Presently my son is fishing the Kodiak area and it is my desire to have my grandsons be able to participate in a healthy Kodiak fishery if they so desire. Throughout my career I have come to the conclusion that the ADF&G management for Kodiak has been stellar and has kept the stocks in Kodiak healthy overall with the current management plan. The current management plan disallows fishing time in the Cape Igvak section when chignik runs are weak, but still allows kodiak fishers access to their traditional fishery when runs are more robust. C. Igvak early run has been closed 4 out the last 6 years. Alaska boats and permits asking value is \$40,000 for Kodiak permits and Chignik permits are \$100,000. I believe Kodiak fishers deserve access to their traditional fishery under the present management plan. I oppose proposal 60.



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

My name is Jamin Hall, my wife and I have a set net site in Uganik Bay. I am writing in opposition to proposal 60.



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

My name is Ken Christiansen. I have seined in Kodiak for more than fifty years, beginning with my father at the age of 6 and now with both my son and daughter. As a captain, for the past 40 years, I have fished the whole Kodiak Management Area. Any change to a management plan should be based on scientific reason. Outcry from one user group to take from another is simply a knee-jerk reaction with a sense of immediate gratification but not necessarily improved results. The recent run failures in the Chignik area may be related to normal cycles, climate change, past overfishing, poor spawning conditions, poor brood stock survival conditions, or other as of yet unknown reasons. Cape Igvak is a traditional fishery for Kodiak Fisherman, Thorvold Olsen, Billie Berestoff, Alfred Torsen, Marius Olsen, and Anril Suydam, to name a few, dating back to the 1960's, when boats were constructed of wood and were much smaller than the 58" limit seiners of today; and prior to the Cape Igvak Management plan. Further, the Management Plans in place already restrict Kodiak Fishermen until the escapement goals in Chignik have been met. Additional restriction of Kodiak fisherman does not guarantee that weather, currents, tides, and ocean conditions will cooperate to provide the ideal returns for Chignik fishermen



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

December 27, 2019

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

RE: CAPE IGVAK MANAGEMENT PLAN
Chignik Proposals 58, 59, 60, 61, 62

Dear Chairman Morisky and Board Members:

The Kodiak Salmon Work Group (KSWG) is an ad hoc committee created to address the issues of Cook Inlet bound sockeye captured in the Kodiak Management Area and the continuation of the Cape Igvak Management Plan. Membership is open and encompasses seiners from both Kodiak seine organizations, setnetters from both Kodiak setnet organizations, beach seine permit holders and processors. In other words, all of Kodiak's salmon fishing community. The group is supported by voluntary stakeholder contributions including those from the City of Kodiak and the Kodiak Island Borough.

KSWG is herewith submitting several documents for the Board's review: 1. Structure and Function of the Kodiak Management Area Salmon Fisheries; 2. Review of Cape Igvak Salmon Management Plan and Proposals to the Alaska Board of Fisheries; and 3. Economic Analysis of Proposals 58, 60,61 and 64. An informational map is attached as well.

Cape Igvak Management Plan (Proposals 58-62)

Chignik's four substantive proposals regarding the Cape Igvak management plan don't outright request that the Board set aside the plan. Instead they focus on provisional changes that would



gut Kodiak's Cape Igvak fishery. Proposal 58 with the date change would reduce, on average, Kodiak's fishery by 79%. Proposal 59 is an accounting change that would reduce the Cape Igvak fishery by about 20%. Proposal 60, like proposal 58, would reduce Kodiak's revenues by about 67% and proposal 61 comes in with a 69% reduction. The fifth proposal (Proposal 62) is a record-keeping proposal that is untenable.

The Cape Igvak Management Plan is embedded in the Mixed Stock Fisheries Policy: "Most mixed stock fisheries are long standing and have been scrutinized many times by past Boards. Consequently, existing regulatory management plans are understood to incorporate conservation burden and allocation" (Allocation Criterion 2). Chignik's guaranteed catch allocation of 300,000 fish (early run) and 300,000 (late run) was a clear balancing in the original plan, favoring Chignik by providing an economic safety net. In addition, Kodiak would share the conservation burden in that the escapement would be assured before Kodiak would go fishing. On the other hand, if Chignik gets its escapement and minimum guaranteed catch, then Kodiak is allowed to harvest up to approximately what was historically caught in the fishery. This is a fairly balanced plan, if not already overbalanced to Chignik's advantage!

Also, the Board states in Allocation Criterion 3, "The policy should recognize that salmon resources are generally fully utilized and that stability is an important aspect of the fisheries." Why is stability important? Many salmon stakeholders make investments and commitments based on regulatory stability. If salmon management plans are subject to change with every Board cycle, fishery values (ex-vessel, permit and gear) will decrease as uncertainty increases, conservation may be compromised, and stakeholders will be encouraged to try to "get a better deal" at each successive Board meeting.

The history of the Cape Igvak Management Plan (Allocation Criterion 1) is of critical importance to understanding why it was developed and how it was balanced between stakeholders. Prior to the plan Kodiak could fish at Cape Igvak any day that the Chignik fleet fished. The "day for day" fishing caused area managers concern that Kodiak's fishing could impact a weaker "second run" to Chignik. Consequently, the catalyst for the Cape Igvak Management Plan was conservation of Chignik's runs. The plan balanced the conservation burden between the two



areas. The plan has been in place for 42 years and has had constant review over multiple Board cycles. Its durability establishes it as one of the marquee fishery management plans in the State of Alaska. Changing a plan of such long duration without significant “new information” or “new fishing patterns” or “stock of concern” assessments or anything other than a proposer’s feeling that something should be changed, compromises and undermines the Board’s standing as a fair and impartial deliberative body.

The functionality of the Cape Igvak Management Plan as a conservation plan is seen in the plan’s application over the past five years. Because of low Chignik escapements there was no Cape Igvak fishery during 3 seasons. Period! Kodiak cannot be held responsible for any of the current biological or economic issues in Chignik due to low Chignik sockeye returns. Kodiak did not fish at Cape Igvak.

The proposer’s assertion, under Allocation Criterion 4, that Kodiak’s salmon fishermen have more “alternative resources” is a false assertion. If this means that Kodiak has more salmon numerically or by species, then the Board must also recognize that Kodiak’s salmon are divided between approximately 180 active seine fishermen and approximately 150 setnet fishermen ---in contrast to about 75 active Chignik permits. Resource availability is reflected in individual gross earnings. Chignik permits, on average over time, continue to earn more than Kodiak fishermen and, consequently, their permits are worth more in the market. “Alternative resources” in this sense would mean that Kodiak had less “alternative resources” per active permit holder than Chignik.

If the “alternative resources” idea means that Kodiak has more “species” available than Chignik salmon fishermen, this too is false. Both Kodiak and Chignik fishermen have access to halibut and cod in their areas although the Federal cod season is now closed in both areas. Only two or three Kodiak salmon fishermen are involved in the Gulf of Alaska trawl fisheries --- a fishery that limits participation with high costs of entry. Both Chignik and Kodiak have historically had a Tanner crab season. While Kodiak currently has a very small Tanner crab quota, only a subset of the Kodiak salmon fleet (like the Chignik fleet) have limited entry permits for the Tanner crab fishery. The Kodiak herring fishery is essentially gone. Kodiak fishermen, especially those from



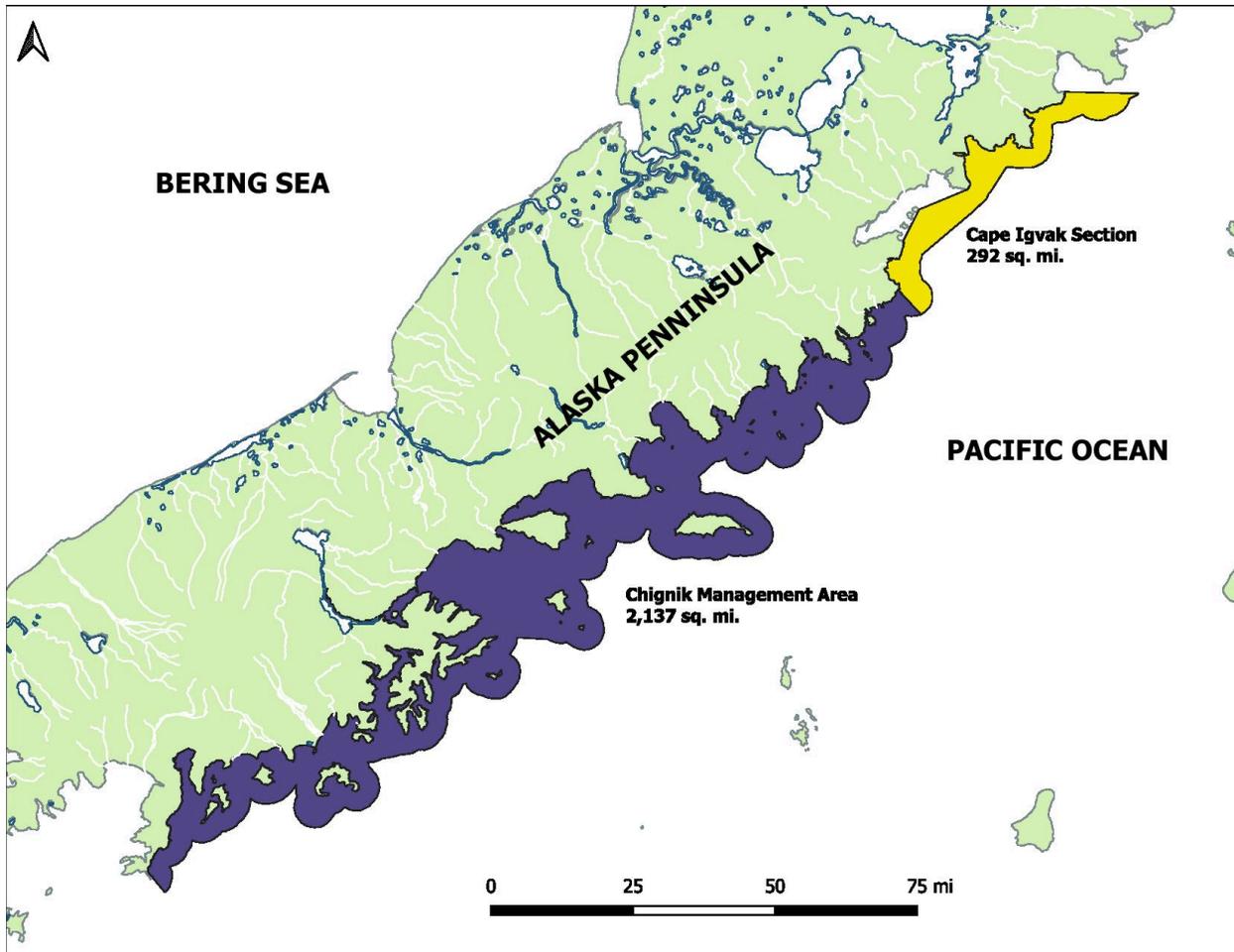
Old Harbor, Akhiok, Ouzinkie, Port Lions and Larsen Bay just don't see what "alternative resources" are available in Kodiak that Chignik doesn't have. All rural communities in the Gulf of Alaska under about 1,500 people are struggling to survive on their fisheries economy--- which is now almost exclusively salmon.

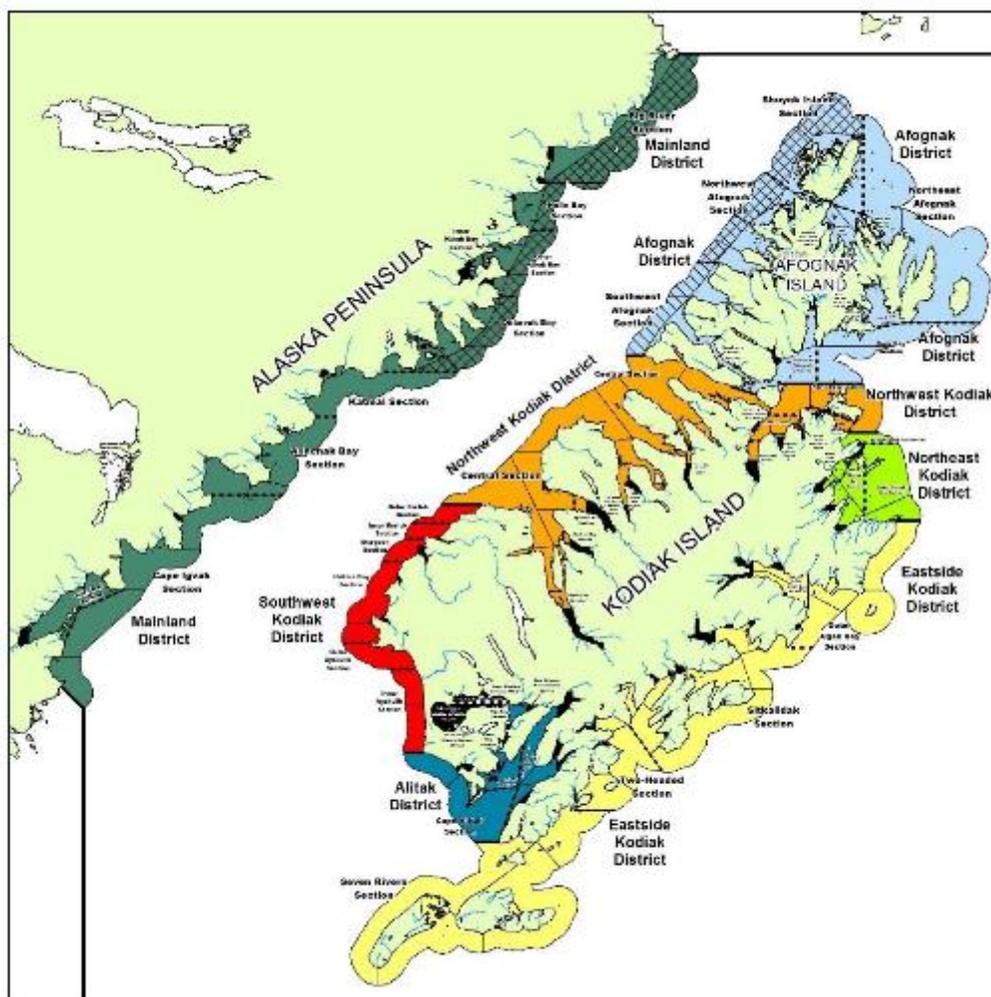
Finally, "The importance of the fishery to the economy of the region and the local area" (Allocation Criterion 7) favors Kodiak. The loss of the Cape Igvak fishery would cost Kodiak fishermen, on average, almost 4 million dollars. At best, the Igvak fishery would increase earnings by a subset of fishermen that actually live in Chignik or the Chignik region by less than an average of 12.0%. While not insignificant, the Igvak fishery is of reduced "importance to the economy of the Chignik region" when compared with the decline of active vessels and the number of Chignik fishermen that are now fishing in Kodiak and Prince William Sound. See further: Review of the Cape Igvak Management Plan and Proposals to the Alaska Board of Fisheries, Proposal 58 Economic Analysis, Proposal 60 Economic Analysis and Proposal 61 Economic Analysis.

In summary, it is the position of the Kodiak Salmon Work Group that the Board should vote NO on proposals 58, 59, 60, 61, 62 and 63. These proposals are not supported by the Board's allocation criteria and do not have a rational relationship to Chignik's conservation needs.

Very truly yours,

Duncan Fields, Chairman





Review of Cape Igvak Salmon Management Plan and Proposals to the Alaska Board of Fisheries

Kodiak Salmon Working Group



Executive Summary

- The Cape Igvak Salmon Management Plan (CISMP) has been in place since 1978 and allocates 15% of total Chignik sockeye harvest to Cape Igvak (Kodiak Management Area) after Chignik is guaranteed 600,000 harvest from early and late runs combined, and escapement goals are projected to be met.
- Management strategies under CISMP have been very successful in meeting the sockeye allocation objective and providing escapements within goals.
- Recent genetics studies are robust, but limited sampling with highly variable results does not in itself justify changes to the management plan.
- Genetic results show that the current regulatory assumption that 90% of Igvak sockeye harvests are Chignik bound fish is overly conservative; all samples showed substantially lower contributions of Chignik-bound sockeye to the Igvak harvests.
- Board of Fisheries proposals to alter metrics guiding the Cape Igvak Salmon Management Plan are not well supported by available data.
- The long-standing Cape Igvak plan appears to be working well in terms of limiting harvest of Chignik origin sockeye through harvest guarantees to Chignik, and meeting escapement goals for early and late runs of Chignik sockeye.



Cape Igvak Salmon Management Plan

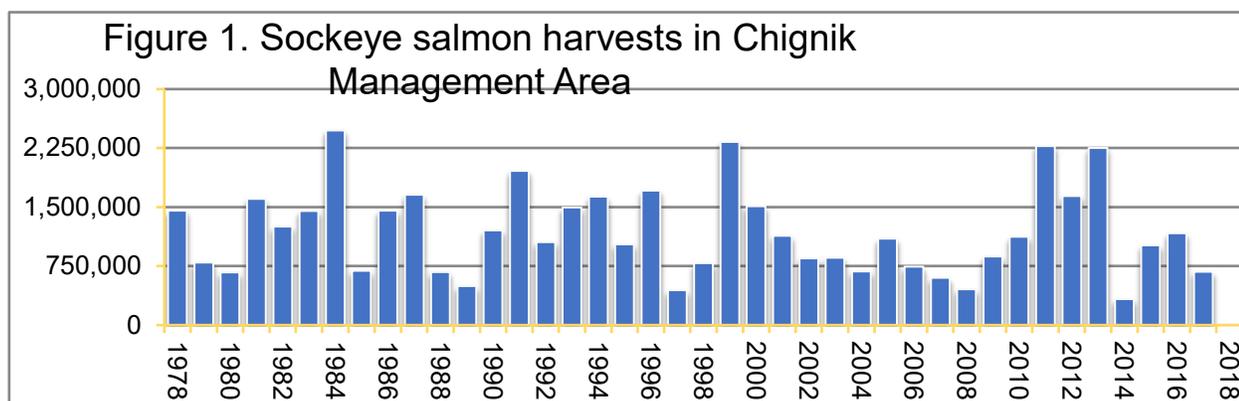
A purse seine fishery has been active along capes in the Cape Igvak section of Kodiak Management Area (KMA) since 1964. Following a tagging study in 1969 (ADFG, unpub. data) where 84% of released tags were recovered in Chignik Area fisheries, periodic modifications to the fishery were directed by the Alaska Board of Fisheries. In 1978, the Cape Igvak Salmon Management Plan (CISMP) was adopted to restrict harvest of Chignik bound sockeye at Cape Igvak. The fishery is one of two in the state (the other is the Southeast District Mainland, Area M) in which harvest and escapement triggers from an adjacent management area (both Area L-Chignik) must be met before the fishery can open. From beginning of the fishing season to July 25, Chignik fishermen must harvest a minimum of 600,000 sockeye salmon (300,000 from both early and late Chignik runs) and adequate escapements for both runs must be projected to occur before harvest will be allowed in Igvak. KMA fishermen at Cape Igvak are allocated 15% of the total Chignik harvest. The Board stipulates that 90% of the harvest at Igvak and 80% of the harvest in Southeast District Mainland (Area M) are Chignik bound fish (Anderson et al., 2019, Wilburn, 2019). Proposals to the Board for the 2020 Kodiak Management Area focus on specific metrics in the plan.

Since the CISMP plan came about, management has been very effective at meeting the allocation objectives in the plan. Only four times in forty years has the 15% target been exceeded by more than 1% (Anderson et al., 2019), which is probably within reasonable expectations for management error. Harvests of Chignik bound fish at Igvak obviously go up and down with Chignik harvests and the Igvak fishery has been closed, or catches extremely low, three times between 2014 and 2018 due to poor



runs and lower harvests in Chignik. On the other hand, Igvak sockeye harvests were much more robust in 2011 and 2013 when Chignik sockeye harvests exceeded 2 million sockeye (Anderson et al., 2019). While Chignik sockeye harvest was essentially zero for 2018, the forty year history shows wide fluctuations, with two of the lowest and two of the highest harvests occurring in the past ten years (Figure 1). Average Chignik sockeye harvests between 1998 and 2018 were about 15% lower than harvests in the previous two decades, 1978-1997. However, three of four harvests over 2 million fish were also in the most recent two decades (Figure 1).

The management plan has also been effective from a conservation and sustainability standpoint. Early and Late sockeye runs to Chignik River have met or exceeded their respective escapement goals every year since 1980, until the run failure in 2018, when the early Chignik sockeye run



failed to meet the escapement goal (Munro, 2019).

Recent Genetics Studies in Igvak Section

In the recent fishery genetic stock identification study in KMA, Shedd et al. (2016) added two sampling strata (early and middle) for Cape Igvak Section in each of the three study years, 2014-2016. No Igvak samples



were taken in 2014 because low Chignik harvest numbers kept the area closed to commercial harvest. In 2015, only the July stratum (middle) was sampled as Igvak was again closed in June due to inadequate sockeye harvests in Chignik Management Area. Harvest of Chignik fish in Igvak was estimated as 2,059 fish (total harvest 6,595) in the middle stratum, 2015. In both 2014 and 2015, the management plan had its intended effect of keeping Igvak closed or limited when Chignik harvests were low. In 2016, with a stronger Chignik run, an estimated 114,412 Chignik sockeye were harvested in the early (June) stratum. An estimated 10,006 Chignik bound sockeye were harvested at Igvak in July (Shedd et al., 2016).

While it is clear that Chignik fish were captured at Igvak in both years, with only three temporal strata sampled over a three year period, including a single datum for early strata harvests, specific conclusions about patterns of presence, magnitude or vulnerability of Chignik bound fish in Igvak fisheries are unwarranted. The single early (June) stratum sampled from the three year period estimated harvest of Chignik bound sockeye an order of magnitude larger than the two middle stratum harvests from 2015 and 2016. These data emphasize wide variation for Chignik bound sockeye harvests at Cape Igvak, and do not support substantive changes to the current management plan.

Data in Shedd et al. (2016) also does not support the presumption in the management plan that 90% of sockeye salmon harvests in Igvak are Chignik bound fish. The single middle stratum (July) estimate from 2015 found 31.2% Chignik sockeye from a total harvest of 6,595. The middle stratum estimate from 2016 was much lower, where only 5.6% of the sampled harvest were Chignik fish (total harvest 177,315). The sole early stratum (June) contribution in 2016 was much higher, estimating 74.1% of



Igvak harvests were Chignik origin (total harvest 154,318), but still did not reach 90%. The assumption that 90% of Igvak harvests are comprised of Chignik bound fish is very uncertain. Other genetic studies suggest uncertainty for similar assumptions in Southeast District Mainland (SEDM, Area M) fisheries, where Chignik bound sockeye are thought to represent 80% of sockeye harvested. Dann et al., (2012), showed that the overall proportion of Chignik bound fish harvested in SEDM was very consistent in 2010, 2011, and 2012 at 65%, 67% and 66% respectively, excluding the Northwest Stepovak Section in July.

Board of Fisheries Proposals

There are five proposals before the board which address the Cape Igvak fishery. Four of these seek to more severely curtail the fishery through specific alterations to metrics of the management plan. They propose completely eliminating fishing at Igvak prior to July 8 (proposal 58), lowering the board approved allocation of Chignik bound fish to KMA fishermen at Igvak from 15% to 5% (proposal 60), or dramatically raising Chignik harvest thresholds upon which Igvak fishery openings are predicated (proposal 61). A fourth proposal suggests that accounting practices for total Chignik harvest be changed such that harvests in Southeast District Mainland (Area M) and Igvak are no longer considered part of the Chignik total harvest. None of these proposals provide credible, data-driven justification for changing longstanding management plans. Recent genetic stock identification results reflect very limited sampling at Cape Igvak (Shedd et al. 2016) and as a result, insight regarding harvest patterns of Chignik sockeye in Igvak fisheries is narrow. There is no doubt that stock composition and harvest estimates are accurate and precise, but



only three strata in two different years were analyzed, where estimated harvest numbers of Chignik bound fish at Igvak were an order of magnitude different between them.

- **Proposal 58** would close Cape Igvak to fishing until July 8, based on increases in KMA harvests and declines in Chignik harvests. However, Chignik fish represented a relatively minor component of Westside KMA harvests sampled in Shedd et al. (2016) and there is no data linking historical harvests in KMA to Chignik harvests. Increases in KMA sockeye harvests over the years most-likely resulted from greater harvests of local sockeye stocks and sockeye from enhancement efforts by Kodiak Regional Aquaculture Association, which averaged about 345,000 during 2008 - 2017 (Anderson et al., 2018). Though Chignik suffered a run failure in 2018, long term average harvests during 1998-2018 are only 15% smaller than those from 1978-1997.
- **Proposal 59** seeks to change fishery accounting practices in CISMP by eliminating SEDM and Cape Igvak harvests from the total Chignik sockeye harvest, for allocation purposes within the plan. Currently 80% of sockeye harvested in most areas of SEDM and 90% of sockeye in Igvak are assumed part of total Chignik harvest. The effect of this is that allocation percentages would be reached sooner and harvests at Cape Igvak would be smaller. If the management plan assumes a specific percentage of Chignik origin fish in SEDM or Igvak, it must be included in



allocative accounting. It would be inappropriate to address only Igvak with such a proposal.

- **Proposal 60** would lower the allocation percentage of Chignik sockeye to Cape Igvak fishermen from 15% to 5% supposedly because at the inception of the management plan, KMA sockeye harvests were weak and Chignik harvests were robust, and now the situation is reversed. While KMA sockeye harvests have improved since 1978 due to local stock performance and enhancement efforts, there is no evidence that any declines of CMA sockeye harvests are tied to Cape Igvak sockeye harvests. Chignik harvests show wide variation since 1978 as many salmon systems do. Two of the highest and two of the lowest Chignik area sockeye harvests have occurred during the last decade (Figure 1). This proposal would significantly reduce harvest in Kodiak's longstanding fishery at Cape Igvak without justification.
- **Proposal 61** would raise harvest thresholds for the early and late Chignik run combined from 600,000 to 1,000,000 sockeye before Igvak could open and guarantee a harvest of 1,000,000 sockeye to Chignik fishermen. The proposal would probably close the Igvak fishery. Justification is based on unstated changes in assumptions and economic conditions that have occurred since inception of the management plan. This is essentially the same proposal submitted to the Area M board meeting in 2019 to



severely curtail the SEDM fishery, which the Board of fisheries rejected.

Proposal 62 creates mandatory reporting for vessels entering or leaving Cape Igvak section. It is likely unworkable and ineffective for fisheries managers to perform this monitoring.

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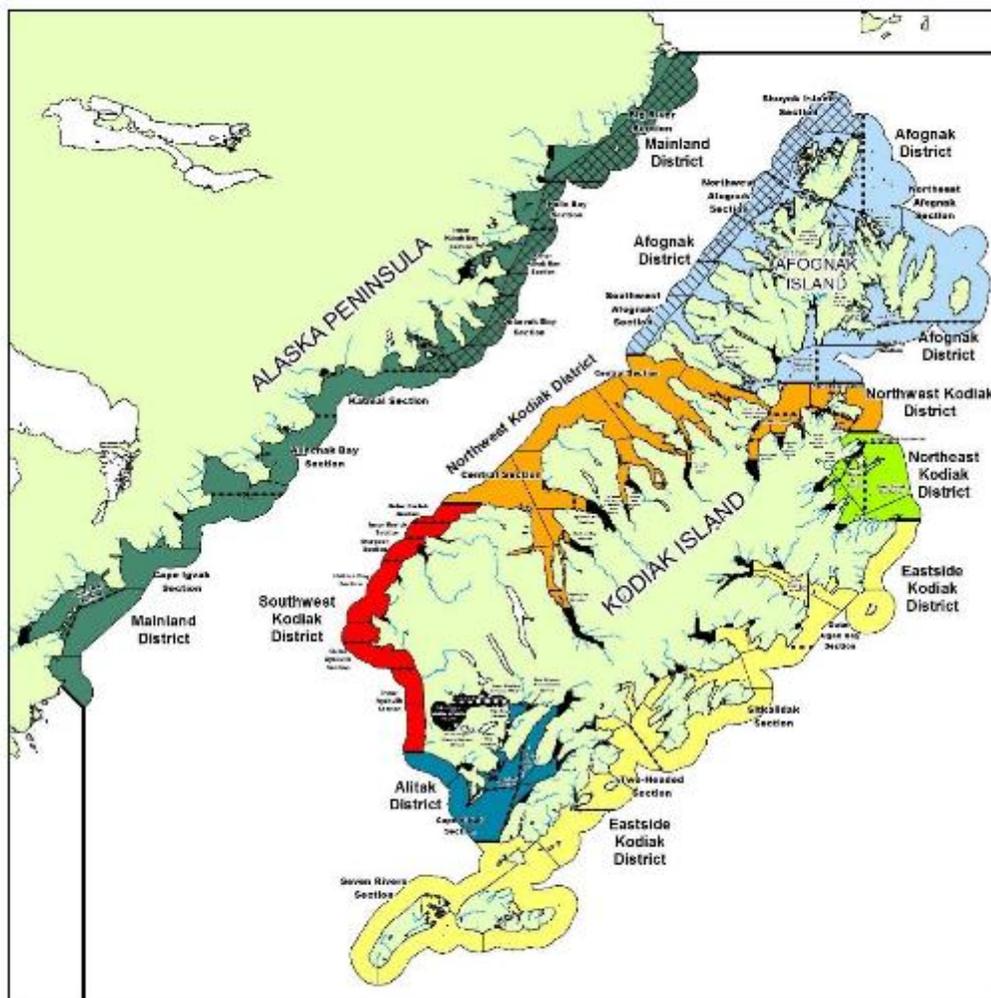
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2019-2020 Board of Fish || Kodiak Finfish || Proposal 60



Economic Analysis Proposal 60

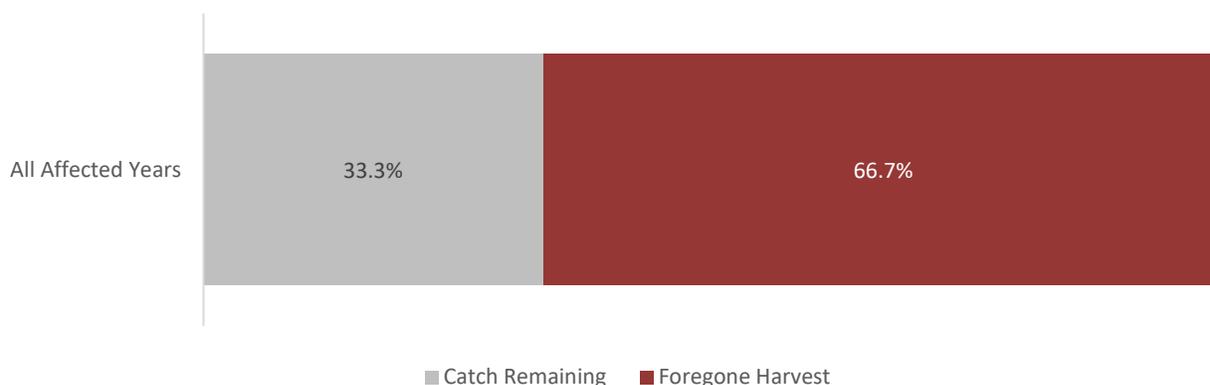
Kodiak Salmon Workgroup



Key Findings

- Overall, changes from Proposal 60 would result in annual economic loss in the Kodiak Borough of almost \$2.9 million.
- On average, restrictions during the effected years would result in more than 65% of the current sockeye catch being eliminated.
- The complete implementation of proposal 60 results in an average foregone harvest worth at least \$1.91 million ex vessel price per year among affected fishermen.
- Direct loss of foregone sockeye harvest per year ranges from \$318,000 to \$4.19 million over the time period examined (1998-2019). Mean foregone sockeye harvest is valued at \$1.56 million per year, using each year's prices. **\$1.91 Million Dollars Yearly Direct Loss to Fishermen**
- The value of foregone sockeye per permit holder affected ranges from \$5,500 to \$51,000 per year (mean \$22,000), depending on number of affected fishermen and count of foregone sockeye harvest. **\$2.86 Million Dollars Annual Economic Loss in the Kodiak Borough**
- Total foregone harvest among all species is estimated to be 1.6 million pounds per year worth an average of \$1.91 million per year, using each year's prices. Average loss per affected permit holder estimated to be \$28,000 per year.
- Species specific foregone harvest ex vessel price is estimated to range between \$24 (chinook) to \$4.19 million (sockeye) per year.

Average Revenue Loss Per Year





Methodology and Data Sources

Background

The 2019-2020 Board of Fish, Kodiak Finfish Proposal 60 will amend the Cape Igvak Management Plan by reducing the Cape Igvak section allocation by 66 percent through a reduction in the current allocation from 15 percent to five percent of the total Chignik sockeye salmon catch.

Currently, the Chignik sockeye salmon catch constitutes those sockeye salmon caught within the Chignik Area plus 80 percent of the sockeye salmon caught in the East Stepovak, Southwest Steovak, Stepovak Flats, Balboa Bay, and Beaver Bay Sections, as described in 5 AAC 09.200(f), plus 90 percent of the sockeye salmon caught in the Cape Igvak Section.

Proposal 60 will only effect on the Cape Igvak section, Kodiak Mainland District.

Link to Proposal 60:

<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2019-2020/proposals/60.pdf>

Data Sources

Foregone harvest days count and pound data was provided by the State of Alaska, Department of Fish and Game daily harvest reports. Price data for 1998-2018 was provided from the State of Alaska, Department of Fish and Game *Commercial Operator's Annual Reports* (COAR). 2019 price data was not available through the COAR report at the time of this analysis. 2019 price data is estimated from the five-year average of the reported 2014-2018 price per pound per species (see methods below).

Multipliers for indirect and induced economic impact were commissioned from the US Department of Commerce, Bureau of Economic Analysis specifically for the Alaska commercial fishing industry. Inflation rates are provided from the US Department of Labor, Consumer Price Index. Tax information is from the State of Alaska, Department of Revenue and the Kodiak Borough.

Data Methods

Economic impact is estimated using historical harvest data from 1998-2019. Cape Igvak is a purse seine fishery. For the period prior to July 8th, no fishing occurred in Cape Igvak in 1998, 2008-2009, 2014-2015, and 2018-2019.

Proposal 60 would be in effect prior to July 25th for all years. The target harvest for Cape Igvak would be reduced from approximately 15% of the Chignik Sockeye Count to a strict 5% limit. The limit is dependent on Chignik sockeye harvest totals (under proposal 60,



90% of the Cape Igvak sockeye harvest is counted towards this value. Under BOF proposal 59, none of the Cape Igvak or Southeast Mainland District is counted towards this total).

Fifteen to five percent is a two-thirds ($2/3$) reduction in harvest. Instead of calculating the precise foregone harvest for each year under the strict 5% plan, the decision was made to calculate a $2/3$ s loss for each season's Cape Igvak harvest with input and consent from the Kodiak Salmon Working Group (KSWG). Actual Cape Igvak harvests vary from $< 1.0\%$ to 19.2% of the Chignik Sockeye Count with a mean value of 12.1% (see results section). While the $2/3$ reduction does not exactly measure the proposal's impact, the author believes this approximation is a fair estimate given available data.

This method will overestimate foregone harvests in some years and underestimate foregone harvests in other years. Due to the strict nature of the 5% limit (currently Cape Igvak is managed to approximately 15%, and this is allowed to fluctuate over the course of the season). Unlike the current management language, Proposal 60 does not allow regulators any flexibility for the percentage to rise above 5% cumulative harvest for the season at any time. Under the current regulation the managers have come in at well under the 15% on average, due to an expected abundance of caution. Under the proposed strict 5% regulation, it can be expected that managers will continue to apply this same level of caution resulting in actual the actual catch being substantially below the 5% average.

The value of foregone harvest is calculated as species-specific foregone harvest pounds multiplied by species-specific Kodiak area price per pound for each year. Foregone harvest counts and economic impact are calculated for Cape Igvak as a whole. The number of permit holders affected by proposal 60 is calculated as the maximum number of unique permits during the closure period in harvest records.

Species specific prices per pound for each year between 1998-2018 were obtained from the Fish Game COAR for each individual year. The total net weight in the Kodiak area for each species for each season is divided by the respective net value.

Final 2019 COAR price per species data is not available. Species specific price for 2019 was estimated as a five-year average of available COAR data (2014-2018). Verification of 2019 data with the KSWG provided spreadsheets using Icicle, Ocean Beauty, and Pacific season prices for 2017-2019 compared to COAR for 2017, 2018. The spreadsheet values varied from published COAR by both higher and lower values up to 20%. The five-year average was much closer to 2017 and 2018 prices than the spreadsheet averages and weighted averages for respective years. The sockeye 2019 season price per pound estimate may be biased downwards given the processor spreadsheet; the COAR numbers were up to 20% lower than provided spreadsheet, and the five-year average is 16% lower than 2019 processor spreadsheet.

Indirect and induced economic loss was calculated from Regional Input-Output Modeling System (RIMS II) type I and type II multipliers. These take into account increase (in this case local loss) in regional economic activity due to change in industry specific earnings.



For this report, the fisheries industry specific multipliers were used. Selected industry multipliers are specific to Alaska.

All values are adjusted for inflation and shown in 2019 dollar values.

Results & Data Tables

Direct Losses

On average, in the years effected by Proposal 60, more than 65% of the current catch would be restricted. From years 1998-2019, 50% of the harvestable catch would be foregone. Overall, these changes would result in an economic loss to the Borough of almost \$2.9 million dollars a year.

**\$1.91 Million Dollars
Yearly Direct Loss to
Fishermen**

Direct revenue lost to the Kodiak Borough per year:

Direct loss per affected year: \$1.91 Million
Loss from sockeye fishery: \$1.56 Million

**\$2.86 Million Dollars
Annual Economic Loss
in the Kodiak Borough**

Fisheries employment impact: 16.8 jobs per year
All employment impact: 21.1 jobs per year
Indirect community loss: \$396,089
Induced community loss: \$558,073

Total Annual Borough Loss: \$2,862,102

Proposal 60 would have impacts throughout the Kodiak Borough. The direct loss to fishermen would be \$1.91 million per year. Of the total loss to the fishery, the limitation on the sockeye fishery comprise the majority of the impact, accounting for \$1.56 million of the loss with \$350,000 of the total loss distributed among other salmon species.

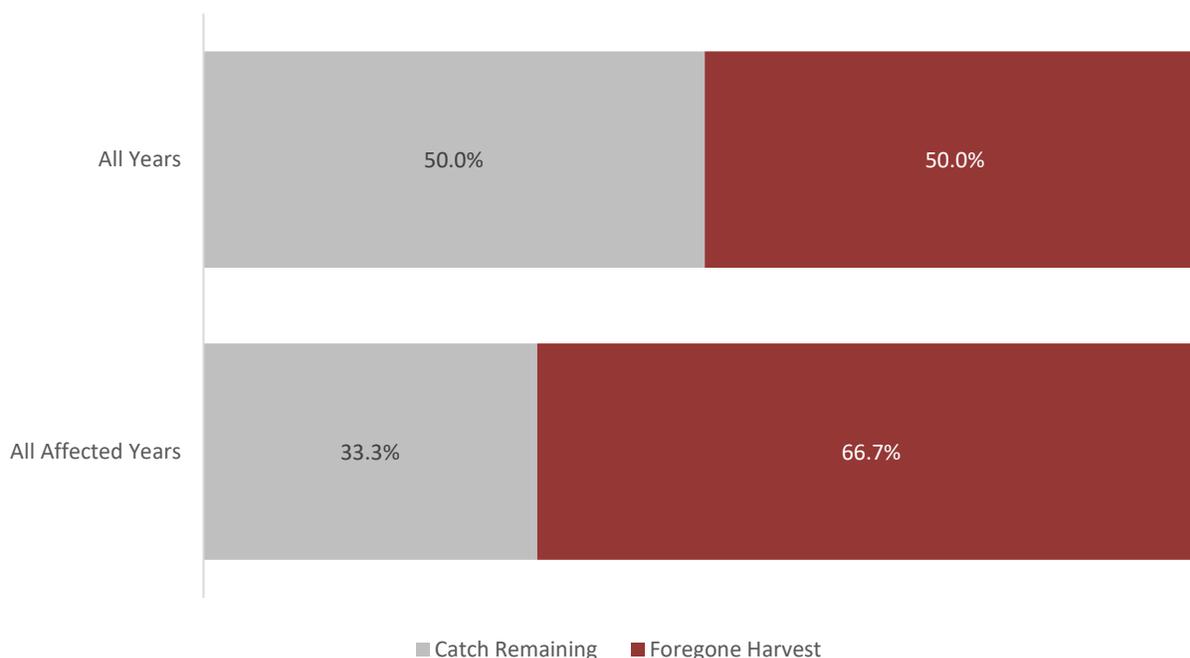
The direct impact of this proposal will result in a loss of 16.8 fisheries specific jobs and a total of 21.1 jobs overall in the Kodiak Borough per year. In addition to the direct loss impact of \$1.91 million, there is a further indirect loss of \$396k as a result of lost business to business economic activity for the community from purchases such as fuel, gear, and supplies. There is an additional \$558k of induced loss in the community resulting from the lost direct and indirect economic activity (total \$2.30 million) and reduced labor market. This impact results in a total loss to the community from direct, indirect, and induced losses of \$2.86 million dollars per year.



Fisheries Loss

On average, restrictions during the effected years would result in more than 65% of the current catch being eliminated. For all years, including 16 affected years, the average revenue loss to the community would be 50%.

Chart 1: Average Revenue Loss Per Year



Over the last 22 years 1998-2019, there have been 12 years where the fisheries losses from these increase restrictions would result in a loss of more than one million dollars of foregone ex vessel value to the fishery. Six of the previous 22 years would be unaffected by the proposed changes. Fishing was severely restricted in 2018 due to historically low run returns.

The sockeye fishery would experience ex vessel losses of more than \$1 million for nine of the 16 affected years.



Chart 2: Total Fishery Loss 1998-2019

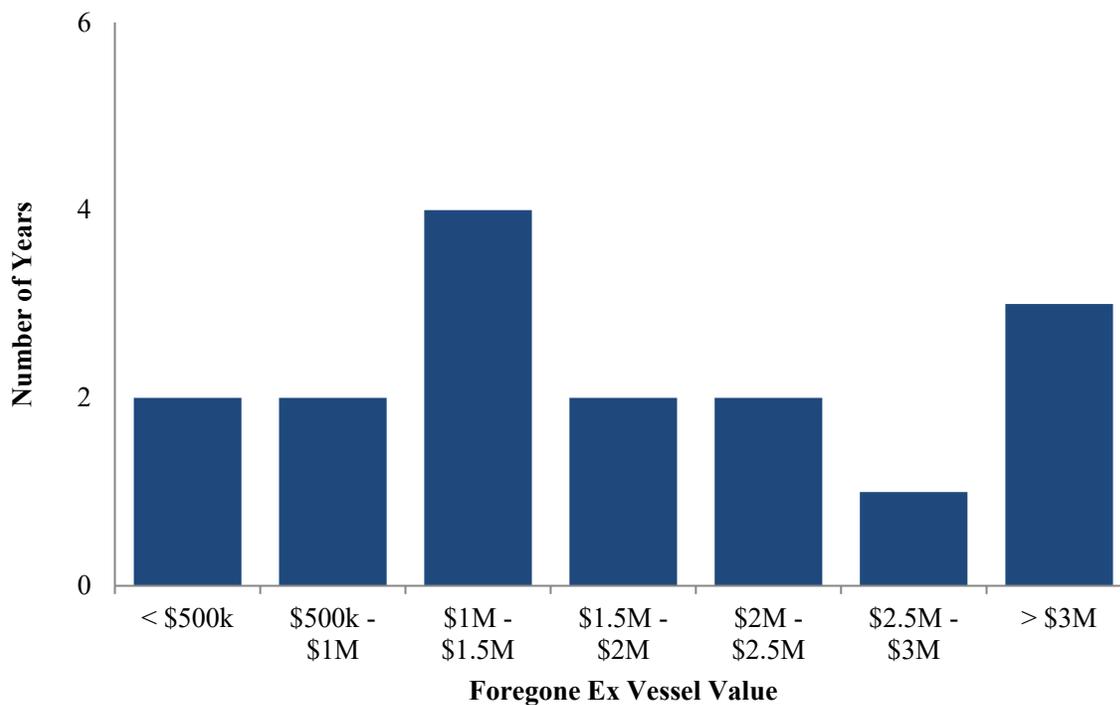
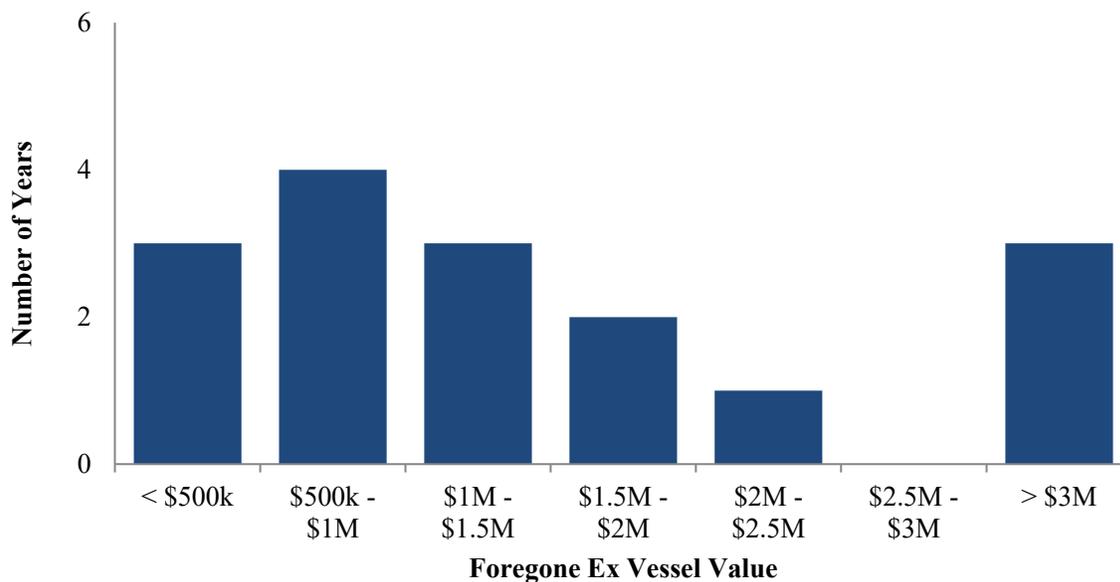


Chart 3: Total Sockeye Loss





The mean direct loss for all species per year is \$1,907,941 with a median loss of \$1,656,477. If these restrictions were in place the greatest impact would have been in 2011 with a loss of \$4,537,403 and the least impact would have been in 2007 with a loss of \$389,844.

Table 1: Direct Loss of Proposal 60 Implementation

Year	Direct Loss All Species	Direct Loss Sockeye
1998	No Impact	
1999	\$4,229,620	\$3,736,340
2000	\$2,108,567	\$1,908,644
2001	\$1,430,565	\$1,119,061
2002	\$567,609	\$533,116
2003	\$479,670	\$426,556
2004	\$599,140	\$579,523
2005	\$1,478,192	\$1,317,114
2006	No Impact	
2007	\$389,844	\$317,994
2008	No Impact	
2009	\$1,197,960	\$817,827
2010	\$1,834,761	\$1,327,089
2011	\$4,537,403	\$4,188,115
2012	\$2,551,241	\$2,332,505
2013	\$3,775,755	\$3,466,421
2014	No Impact	
2015	No Impact	
2016	\$1,992,709	\$1,743,820
2017	\$1,264,071	\$847,966
2018	No Impact	
2019	\$2,089,948	\$373,277
Mean	\$1,907,941	\$1,564,711
Median	\$1,656,477	\$1,218,088
Min	\$389,844	\$317,994
Max	\$4,537,403	\$4,188,115



Table 2: Direct Loss of Proposal 60 Implementation Per Fishermen

	Average Loss Per Fishermen - All Species	Average Loss Per Fishermen - Sockeye Only
Mean	\$27,845	\$21,539
Median	\$23,331	\$17,107
Min	\$6,150	\$5,469
Max	\$55,334	\$51,075

Based on the number of active permits per year, individual fishermen would experience a mean direct loss for all species per year of \$27,845 with a median loss of \$23,331. If these restrictions were in place the greatest impact would have been in 2011 with a loss of \$55,334 per fishermen with the least impact in 2003 with an average loss of \$6,150.

Table 3: Loss Per Affected Permit Holder

Year	Permits	Loss per Permit	Total Value Foregone Harvest	2019 Inflation Adjustment
1998	No Impact			
1999	126	\$33,568	\$2,739,391	\$4,229,620
2000	126	\$16,735	\$1,411,357	\$2,108,567
2001	81	\$17,661	\$984,559	\$1,430,565
2002	69	\$8,226	\$396,929	\$567,609
2003	78	\$6,150	\$343,112	\$479,670
2004	37	\$16,193	\$439,897	\$599,140
2005	71	\$20,820	\$1,122,394	\$1,478,192
2006	No Impact			
2007	36	\$10,829	\$314,137	\$389,844
2008	No Impact			
2009	28	\$42,784	\$999,132	\$1,197,960
2010	71	\$25,842	\$1,554,882	\$1,834,761
2011	82	\$55,334	\$3,969,732	\$4,537,403
2012	60	\$42,521	\$2,277,894	\$2,551,241
2013	78	\$48,407	\$3,420,068	\$3,775,755
2014	No Impact			
2015	No Impact			
2016	63	\$31,630	\$1,858,870	\$1,992,709
2017	83	\$15,230	\$1,205,025	\$1,264,071
2018	No Impact			
2019	39	\$53,588	\$2,089,948	\$2,089,948
Average		\$27,845	\$1,592,687	\$1,907,941



Foregone Tax Revenue

The foregone harvest from proposal 60 would have tax implications for state, borough, and city budgets. The state implements two relevant taxes in the region: the fisheries business tax (which is shared with local governments) and the salmon enhancement tax (SET). Fisheries business tax rates vary by type of processing activity and the proportion of each is estimated from the State of Alaska’s Annual Tax Report for FY18. The salmon enhancement tax rate is 2% in the Kodiak region. The Borough implements a resource severance tax of 1.075% and receives a share of the fisheries business tax from the state. The local city governments also receive a share of the fisheries business tax from the State of Alaska. Borough and city shares of the fisheries business tax estimated from the Borough’s FY18 annual tax report.

The implementation of proposal 60 would result in average yearly tax losses of \$68,686 to the State of Alaska, \$30,259 to the Kodiak Borough, and \$9,085 to Kodiak City.

State Taxes

Fisheries Business Tax (50% Share)	\$30,527
SET Tax	\$38,159
Total	\$68,686

Borough

Resource Severance Tax	\$20,510
Fisheries Business Tax (Share of 50%)	\$9,748
Total	\$30,259

Cities

(Share of Fisheries Business Tax)	
Akhiok	\$2,275
Kodiak	\$9,085
Larsen Bay	\$2,273
Old Harbor	\$2,441
Ouzinkie	\$2,359
Port Lions	\$2,346
Total	\$20,779



Loss by Species

Table 4: Cape Igvak Sockeye Harvest Per Year
(Proposal 60 imposes a strict 5% limit, affected years are bolded)

Year	Count Cape Igvak Sockeye Catch	Percent Cape Igvak Harvest	Total Chignik Sockeye Count
1998	8,813	1.0%	862,172
1999	456,039	15.4%	2,956,471
2000	271,344	14.4%	1,884,415
2001	215,214	15.1%	1,429,242
2002	136,488	13.0%	1,049,494
2003	121,887	11.7%	1,046,495
2004	160,665	17.9%	896,927
2005	274,328	17.7%	1,550,952
2006	41,834	5.0%	845,731
2007	52,527	8.0%	653,740
2008	0	0.0%	455,199
2009	126,968	12.1%	1,047,180
2010	185,193	13.3%	1,395,595
2011	494,538	16.9%	2,928,856
2012	324,895	15.5%	2,091,495
2013	354,179	12.8%	2,776,632
2014	0	0.0%	330,302
2015	5,936	0.5%	1,118,959
2016	298,470	19.2%	1,558,034
2017	118,101	14.0%	841,241
2018	0	0.0%	128
2019	76,399	10.8%	707,543

**Table 5: Sockeye Foregone Harvest**

Year	Foregone Harvest - lbs	Sockeye Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	2,239,706	\$1.08	\$2,419,909	\$3,736,340
2000	1,428,462	\$0.89	\$1,277,540	\$1,908,644
2001	1,097,384	\$0.70	\$770,173	\$1,119,061
2002	606,579	\$0.61	\$372,809	\$533,116
2003	505,794	\$0.60	\$305,119	\$426,556
2004	651,054	\$0.65	\$425,494	\$579,523
2005	1,246,469	\$0.80	\$1,000,087	\$1,317,114
2006	No Impact			
2007	256,585	\$1.00	\$256,240	\$317,994
2008	No Impact			
2009	606,747	\$1.12	\$682,091	\$817,827
2010	793,429	\$1.42	\$1,124,652	\$1,327,089
2011	2,400,988	\$1.53	\$3,664,143	\$4,188,115
2012	1,414,234	\$1.47	\$2,082,594	\$2,332,505
2013	1,725,002	\$1.82	\$3,139,874	\$3,466,421
2014	No Impact			
2015	No Impact			
2016	1,275,427	\$1.28	\$1,626,698	\$1,743,820
2017	534,366	\$1.51	\$808,356	\$847,966
2018	No Impact			
2019	269,229	\$1.39	\$373,277	\$373,277
Total	17,051,454		\$20,331,104	\$25,037,419

**Table 6: Chum Foregone Harvest**

Year	Foregone Harvest - lbs	Chum Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	959,079	\$0.19	\$178,002	\$274,836
2000	347,606	\$0.22	\$75,482	\$112,770
2001	467,041	\$0.32	\$149,056	\$216,579
2002	91,786	\$0.16	\$14,835	\$21,214
2003	130,255	\$0.14	\$18,136	\$25,354
2004	83,918	\$0.12	\$10,305	\$14,036
2005	123,595	\$0.20	\$24,965	\$32,879
2006	No Impact			
2007	76,432	\$0.35	\$26,903	\$33,387
2008	No Impact			
2009	283,465	\$0.44	\$124,222	\$148,942
2010	529,073	\$0.56	\$296,398	\$349,750
2011	343,781	\$0.69	\$237,232	\$271,156
2012	248,926	\$0.60	\$149,931	\$167,923
2013	348,035	\$0.25	\$88,387	\$97,579
2014	No Impact			
2015	No Impact			
2016	253,825	\$0.34	\$85,575	\$91,736
2017	200,969	\$0.57	\$115,282	\$120,931
2018	No Impact			
2019	201,326	\$0.46	\$91,671	\$91,671
Total	4,689,113		\$1,686,393	\$2,070,752



Table 7: Pink Foregone Harvest

Year	Foregone Harvest - lbs	Pink Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	632,841	\$0.14	\$89,202	\$137,728
2000	129,971	\$0.14	\$18,686	\$27,917
2001	359,211	\$0.12	\$42,635	\$61,949
2002	69,657	\$0.09	\$5,990	\$8,565
2003	159,906	\$0.09	\$14,041	\$19,630
2004	15,112	\$0.10	\$1,450	\$1,974
2005	723,136	\$0.12	\$86,846	\$114,376
2006	No Impact			
2007	108,274	\$0.18	\$19,532	\$24,239
2008	No Impact			
2009	644,664	\$0.26	\$165,868	\$198,876
2010	168,417	\$0.44	\$73,265	\$86,453
2011	101,817	\$0.47	\$47,389	\$54,166
2012	71,264	\$0.48	\$33,991	\$38,069
2013	338,849	\$0.42	\$143,384	\$158,296
2014	No Impact			
2015	No Impact			
2016	172,135	\$0.47	\$81,249	\$87,099
2017	552,761	\$0.43	\$236,723	\$248,323
2018	No Impact			
2019	3,879,657	\$0.37	\$1,432,939	\$1,432,939
Total	8,127,670		\$2,806,609	\$3,014,018

Table 8: Coho Foregone Harvest

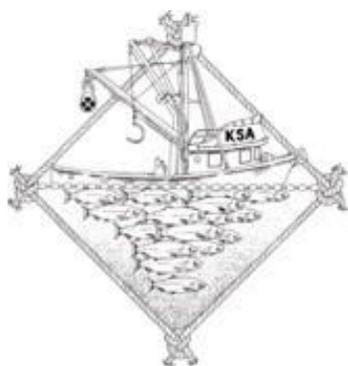


Year	Foregone Harvest - lbs	Coho Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	92,247	\$0.41	\$37,430	\$57,791
2000	74,789	\$0.49	\$36,463	\$54,476
2001	18,824	\$0.24	\$4,522	\$6,571
2002	7,280	\$0.18	\$1,293	\$1,850
2003	14,551	\$0.20	\$2,908	\$4,065
2004	19	\$0.27	\$5	\$7
2005	227	\$0.42	\$96	\$126
2006	No Impact			
2007	11,621	\$0.60	\$6,945	\$8,619
2008	No Impact			
2009	34,717	\$0.61	\$21,141	\$25,348
2010	67,377	\$0.80	\$53,693	\$63,358
2011	10,186	\$0.82	\$8,325	\$9,515
2012	4,278	\$0.77	\$3,298	\$3,694
2013	46,813	\$0.72	\$33,508	\$36,993
2014	No Impact			
2015	No Impact			
2016	69,644	\$0.78	\$54,542	\$58,469
2017	50,886	\$0.84	\$42,539	\$44,624
2018	No Impact			
2019	286,229	\$0.67	\$191,542	\$191,542
Total	789,690		\$538,426	\$607,223

Table 9: Chinook Foregone Harvest



Year	Foregone Harvest - lbs	Chinook Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	No Impact			
1999	21,809	\$0.68	\$14,848	\$22,925
2000	4,808	\$0.66	\$3,185	\$4,758
2001	25,255	\$0.72	\$18,173	\$26,405
2002	5,437	\$0.37	\$2,002	\$2,863
2003	8,194	\$0.35	\$2,908	\$4,065
2004	5,133	\$0.51	\$2,643	\$3,600
2005	13,672	\$0.76	\$10,401	\$13,698
2006	No Impact			
2007	5,068	\$0.89	\$4,516	\$5,605
2008	No Impact			
2009	8,493	\$0.68	\$5,811	\$6,967
2010	10,664	\$0.64	\$6,874	\$8,111
2011	14,117	\$0.90	\$12,643	\$14,451
2012	13,301	\$0.61	\$8,079	\$9,049
2013	25,927	\$0.58	\$14,915	\$16,466
2014	No Impact			
2015	No Impact			
2016	11,929	\$0.91	\$10,807	\$11,585
2017	2,774	\$0.77	\$2,124	\$2,228
2018	No Impact			
2019	627	\$0.83	\$519	\$519
Total	177,208		\$120,453	\$153,301



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

December 12, 2019

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

RE: Opposition to Proposal 60

Dear Chairman Morisky and Board of Fish Members:

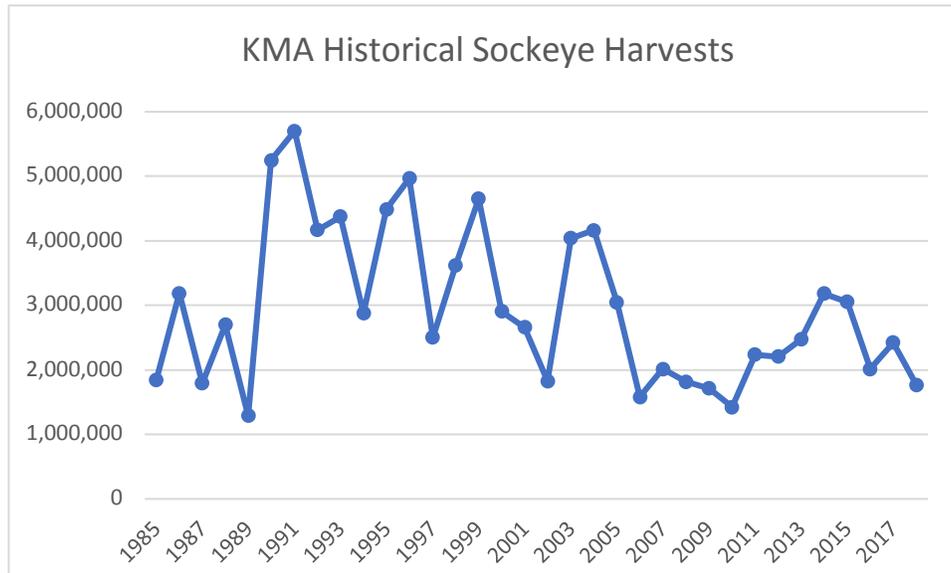
The Kodiak Seiners Association (KSA) is writing to express our adamant **opposition to proposal 60**, which intends to reduce our longstanding historical allocation of sockeye salmon harvested in the Cape Igvak section of the Kodiak Management Area (KMA). Kodiak fishermen have harvested fish in this area since well before initiation of the limited entry program for salmon. The Cape Igvak management plan was initiated in 1978 and has been repeatedly scrutinized and evaluated including at the 2017 Kodiak finfish Board of Fisheries (BOF) meeting, at which a virtually identical suite of proposals was considered and rejected.

The durability of the Cape Igvak management plan is a testament to the care with which the plan was crafted and the success of its implementation. The plan includes both escapement and harvest requirements in the Chignik area before triggering an opening in the Kodiak area so that relatively poor years in Chignik such as 2018 and 2019 result in no fishery being prosecuted at Cape Igvak prior to July 25. On years of relative abundance of Chignik bound sockeye with a high harvest rates in the Chignik area, Kodiak fishermen are allowed access to the Cape Igvak area where up to 25% of total KMA sockeye harvest occurs. On particularly poor years in Kodiak, such as 2016, the Cape Igvak fishery provides a critical lifeline for Kodiak fishermen who have recently endured historically poor local pink and chum runs during even years.

The Kodiak fishery cannot accurately be categorized as “notably and exceptionally healthier” as is claimed in the justification language for this proposal. Early sockeye runs in Kodiak have followed similar trends of scarcity seen throughout the Gulf of Alaska. Fishing opportunities have been highly restricted in the Ayakulik, Alitak, and Karluk areas and recent early run sockeye harvests have been abysmal. When the Cape Igvak management plan was originally introduced, and as it has been continually re-analyzed and challenged, Kodiak fishermen had historically harvested far higher numbers of sockeye and were allowed significantly more fishing opportunities in these areas. Below is a graph of sockeye harvests in Kodiak since 1985. Claims of increasingly abundant harvests of



sockeye salmon are patently false and only in 3 of the past 15 years has harvest exceeded the long-term average of 2.9 million fish.



In 1978, the year that the Cape Igvak management plan was implemented, 372 vessels participated in the Kodiak seine fishery. Over the past 10 years an average of only 167 boats have made deliveries in the Kodiak area, while over 200 permits have remained latent. This is a greater loss of vessels than any other seine fishery in the state. To put this number in perspective, the number of vessels that the Kodiak area has lost is roughly three times the number vessels currently participating in the Chignik fishery. This loss of vessels underscores the harsh economic reality of the Kodiak seine fishery. While over the past 10 years, Kodiak and Chignik fishermen have roughly the same average revenues per vessel, the Kodiak fishery is prosecuted over a longer season, and through greater geographic range resulting in higher costs and lower profit margins for KMA fishermen. This is why the cost of a Kodiak seine permit has consistently been the lowest values in the state – it’s simply tough to make money in the area.

The contraction of Kodiak’s historic commercial fleet is reflective of underlying economic factors that go beyond depressed salmon markets and depleted runs. While Chignik and Kodiak have virtually identical availability of alternative fishery resources, Kodiak fishermen have been more prone to exploit other fishing opportunities. When the Cape Igvak management plan was implemented Kodiak enjoyed prolific crab, halibut, shrimp, and herring fisheries. The collapse of the king crab and shrimp fisheries, the accelerated consolidation of the halibut fleet and the loss of a robust herring market followed by a complete collapse of that fishery (there wasn’t a single commercial sac roe delivery last season) are all factors contributing to the long-term demise of Kodiak’s commercial fishing fleet. Most recently, the virtual elimination of the cod fishery has now left the vast majority of Kodiak fishermen with only one option to make a living – salmon. A once thriving fleet and local economy that was built around a diversity of fishery resources has been distilled down to a fraction of the operating vessels desperately hoping for a decent salmon season to get them through the winter.



The harsh economic conditions facing the Kodiak fleet have been most acute in the remote and predominately Indigenous Alutiiq villages of the archipelago. Ouzinkie's fleet, which once numbered over 30 commercial vessels, has contracted to a single operating boat. Larson Bay has lost its school, and all resident fishing vessels, and the southern village of Akhiok also has only a single vessel left. Old Harbor and Port Lions are also at risk of losing their fleet as reduced participation threatens to completely wipe out the historical commercial fishing legacy of these areas.

Researchers from the University of Alaska declared in a report provided to the North Pacific Fishery Management Council in 2018 that the 6 outlying villages of Kodiak have "reached a crisis due to lost fishery access and the cumulative impacts of restrictive access management." Their research concluded that there has been a 75% decrease in the number families fishing along with an 85% decrease in young people owning state fishing permits in Kodiak's villages. Our salmon fishery is the final pillar supporting these communities and any effort by the Board to allocate fish away from Kodiak could lead to the ultimate collapse of our most vulnerable rural fishing communities.

A common point of confusion among KSA members that has recently received more attention is what appears to be the inconsistent application of the Mixed Stock Fisheries Policy. Chignik fishermen are undeniably prosecuting an expanding mixed stock fishery. At the 2019 Alaska Peninsula/Aleutian Island/Chignik finfish meeting, the Board of Fisheries was provided a report from the Chignik area management biologist Dawn Wilburn, reporting that:

"Historically at least 80% if the sockeye salmon harvest have occurred in the Chignik Bay and Central Districts. Since 2014 Combined harvest in these districts has dropped ranging from 50 to 77% While the western district has seen an increase with 27 to 50% of the total CMA harvest depending on the year."

While Chignik fishermen often claim that they are prosecuting a terminal harvest fishery, the WASSIP study conclusively demonstrated the contrary. Rates of harvest from non-local stocks were recorded to exceed 50% in outlying districts with some area and strata logging in nearly 40% harvest rates of "East of WASSIP" fish, many of which were undoubtedly bound for Kodiak streams. As Chignik fishermen's harvest have drastically shifted into fully allocated mixed stocks, the BOF has decided to take no action to curtail this expanding fishery, despite clear guidance in the mixed stock fisheries policy which states that:

(d) Most wild Alaska salmon stocks are fully allocated to fisheries capable of harvesting available surpluses. Consequently, the Board will restrict new or expanding mixed stock fisheries unless otherwise provided for by management plans or by application of the Board's allocation criteria...

Meanwhile, Kodiak fishermen are still subjected to the North Shelikof Strait management plan and the Cape Igvak management plan, which restrict the harvest of fish in the KMA to hold Kodiak fishermen accountable for the non-local components of their mixed-stock harvest. Chignik fishermen, on the other hand, are held uniquely unaccountable for their rapidly increasing harvest of eastbound stocks regardless of their impact on Kodiak's fishery. KSA strongly contends that any changes to the distribution of the salmon resources shared between Kodiak and Chignik must begin in the Chignik area, where fishermen have already taken for themselves a greater allocation of the Western Gulf's salmon runs.



Nevertheless, it is also our belief that problems in our area are best addressed locally and we have therefore abstained from busying the Board of Fisheries with numerous potential proposals that would intend to restrict Chignik fishermen to their historical fishing patterns. We believe that Board policy should be applied consistently, and that the ultimate outcome of restricting historical mixed stock fisheries would lead to net economic hardships for the State of Alaska along with reduced yield and lost confidence in salmon management. Responsibly prosecuted mixed stock fisheries should be celebrated instead of vilified and it is our hope the Board recognizes the value that geographic diversity of salmon harvest provides is creating economically more stable fisheries in the Western Gulf.

KSA understands and sympathizes with the difficulties facing the villages of the Chignik area, but it is clear that these challenges are not unique to these localities. The Board cannot solve Alaska's coastal problems by shuffling allocations between downtrodden fisheries without causing irreparable harm to those communities that lose access rights. KSA encourages the Board to be fair and consistent in its application of the Sustainable Salmon Policy and the Mixed-Stock Fisheries Policy and to consider allocative decisions through the rigorous analysis of the allocation criteria, including strong consideration to how changes in harvest distribution will impose economic hardship on communities within the Kodiak region. Allocating fish away from a historical fishery such as Kodiak's with unusually high latent permit rates and a depleted fleet would necessarily put even more of our fishermen out of work; you cannot shrink the pie and expect the same number of people to feed on it.

KSA respectfully requests the Board **REJECT proposal 60**. We thank you for the opportunity to comment on behalf of the membership of KSA. We appreciate the scientific and factual creation of regulations regarding our fisheries and trust that the Board will continue to apply consistency in designing regulation changes while applying the guiding BOF policies, such as the Management for Mixed Stock Salmon Fisheries.

Kodiak Seiners Association represents 157 members, including the majority of actively fishing SO1K seine permit holders, Kodiak and Homer-based businesses, and individual crewmembers. Our focus is advocacy for our membership through positive interactions with ADF&G, the Board of Fisheries, and our State Legislature.

Respectfully,

Nate Rose
KSA President



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

My name is Mariel Ellingson, I'm 30 years old and I grew up set netting In kodiak. I live in kodiak and was fortunate to participate in this years salmon seine season. These are not conservation proposal.



December 24, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

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

RE: Opposition to proposal 60

Dear Chairman Morisky and board of fisheries members,

I am a Homer resident and make my living running my own boat in the Kodiak salmon seine fishery and I oppose proposal 60 that would create a major allocation shift in the sockeye harvest in the Cape Igvak management section from Kodiak to Chignik. The Igvak section is an important part of our fishery and helped to raise our family and put them through collage.

Proposal 60 would do two things that would change the sockeye allocation of the Igvak section from Kodiak to Chignik. First it would change the wording in the management plan from "will approach as near as possible" to "shall not exceed" 15% of the total Chignik sockeye salmon catch. Second it would change the allocation from 15% to 5% of the Chignik sockeye salmon catch.

The Cape Igvak management plan has been implemented since 1978 with the words "will approach as near as possible" in the plan since it was adopted. Changing this language to "shall not exceed" will have several consequences. The first and most important is that it would not allow the Kodiak harvest to exceed 15% of the Chignik harvest at any given time during the season. Kodiak has at many times during the June fishery exceeded the 15% for a short time but Chignik has much more fishing time and always catches up. Kodiak has only exceeded the 15% allocation at the end of the season a few times in the history of the plan and has averaged about 12% across its history when Kodiak was allowed to fish. Traditionally some of the early Chignik sockeye run in June travels by Igvak coming from the east and the late Chignik sockeye run in July travels from the west to Chignik and a low portion of the run passes through Igvak. If the Kodiak managers are not allowed to go over the 15% at times in the early run it will make it much harder to manage for the plan's allowed 15% allocation thus causing an allocation shift towards Chignik. The second thing that this language change would do is in the very rare instance



where Fish and Game accidentally allowed the Kodiak harvest to end up a bit over the 15% that would cause a violation of regulations.

The second thing that this proposal would do if adopted is shift 66% of the Igvak allocation from Kodiak to Chignik. The proposer is claiming that this is justified because the Cape Igvak management plan was put in place because of poor Kodiak salmon returns. In fact the Cape Igvak management plan was put in place to curtail a traditional Kodiak fishery and allocate fish from Kodiak to Chignik. Before the plan's implementation Kodiak fished in the Cape Igvak section congruent with Chignik with both areas receiving equal fishing time and Kodiak gave up substantial fishing time under the plan. The management plan created an allocation with Chignik with conservation measures built in to protect the Chignik stocks and fishery in times of low abundance, and had nothing at all to do with giving Kodiak Chignik bound fish because of low abundance of Kodiak stocks. The justification of this proposal is built on false pretenses and the data in my opinion shows no substantial changes to the harvests of Igvak and Chignik that would justify an allocation shift at all, let alone one of 66%.

In closing I ask that you keep the long standing Cape Igvak management plan in place as written and oppose proposal 60.

Sincerely,

Matthew Alward



Nicholas Hoffman
PO Box 1212
Kodiak, AK 99615

12/24/19

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Oppose Proposal 60

Dear Chairman Moriskey and Board of Fish members:

I'm a young Kodiak salmon fisherman. I have been running a seine boat since 2011 as well as participating in Kodiak halibut, sea cucumber, cod jig, and tanner crab fisheries. I respectfully request the Board reject Proposal 60.

The 15% allocation was given in the first place because it was a historic Kodiak fishery, not because Kodiak needed more fish. There are already safeguards built into this plan that insure that Chignik fishermen catch lots of fish before the Igvak Area can even open. In the last few years its been sad to see a downcycle in the Chignik fishery, but run strengths are cyclical and Chignik may be strong again. Similarly, Kodiak's run strength fluctuates. This proposal is just a grab at fish and has no basis in conservation as the current Igvak management plan already takes that into account. This is simply an attempt to disenfranchise a historical Kodiak fishery and give more fish to Chignik fishermen. There has been no change in the allocation criteria to merit a change in the allocation.

I see no reason for the Board to make any changes to the Kodiak Salmon Management plan. Thank you for the opportunity to comment on the proposals and the chance for my voice to be heard. I look forward to the Board of Fish members getting to spend time in Kodiak and learn more about our town and fishing community.

I humbly request the Board reject Proposal 60.

Sincerely,

Nicholas Hoffman
F/V Relentless



December 24, 2019

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

Re: Opposition to Proposal 60

Dear Chairman Morisky and Board of Fisheries Members,

I am Richard Roth, Kodiak salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife, three children and I reside in Homer, but fish in Kodiak. I own and operate the F/V Sea Tzar. Previously I owned and operated the F/V Kelly Girl. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before *any fishing at Igvak occurs*. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak.

The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits.

I ask that the Board reject proposal 60 and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,
Richard, Amanda, Stephanie, Noah, and Ranger Roth
F/V Sea Tzar
Homer, Alaska



December 19, 2019

Robert Fellows

266 E Bayview Ave.

Homer, AK. 99603

Alaska Board of Fisheries

Board Support Section

PO Box 115526

Juneau, Ak. 99811-5526

RE: Opposition to proposal 60

Dear chairman Morisky and Board of Fisheries members,

I have been a commercial salmon fisherman in the Kodiak management area for the past 29 years. I have been supporting myself and my family by commercial fishing for even longer. I have depended on the Cape Igvak fishery, in years of harvestable surplus in the Chignik area, to make fishing in Kodiak viable enough to continue to do. I respectfully request the Board rejects proposal #60.

The Cape Igvak management plan is a long standing, well-functioning management tool that allows access to historical fishing areas for Kodiak fishermen in years of harvestable abundance in the Chignik management area. There has been no change in the allocation criteria to justify needing a change in this allocation. The Cape Igvak section does not open when there are weak runs in the Chignik management area.

Sincerely,

Robert Fellows



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

Reducing the Igvak harvest to 5% is essentially closing the Igvak section. While the catch of reds in Igvak is only 12% of the KMA harvest, it is critical income to the guys that traditionally fish there. This proposal doesn't enhance the Chignik runs, it won't do anything but intentionally strip common property fish from current harvesters dependent on opportunity.



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

December 24, 2019 Alaska Board of Fisheries Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 Re: Opposition to Proposal 60 Dear Chairman Morisky and Board of Fisheries Members, I am Steve Roth, Kodiak and Lower Cook Inlet salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife and I reside in Homer, but fish in Kodiak. I own and operate the F/V Sea Grace. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures. This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen. The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before any fishing at Igvak occurs. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state. If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak. The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits. I ask that the Board reject proposal 60 and not make any changes to the Cape Igvak Management Plan. Thank you for your careful consideration, Steve and Jenny Roth F/V Sea Grace Homer, Alaska



RE: PROPOSAL 60 Reduce the Cape Igvak Section allocation from 15 percent to five percent of the total Chignik Area sockeye salmon catch

66%reduction in fishing is extreme. manage on facts not feelings.



December 24, 2019

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

Re: Opposition to Proposal 60

Dear Chairman Morisky and Board of Fisheries Members,

I am William Roth, Captian of the F/V Sea Chantey. I own a Kodiak seine permit and have been fishing it for the lasat 5 years as well as working as crew since 2010, I rely mostly on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

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I ask that the Board reject proposal 60 and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,
William and Kaytlen Roth
F/V Sea Chantey
PO BOX 1230
Homer AK
99603



December 27, 2019

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

Charles "Chuck" McCallum
601 N Bragaw Street
Anchorage, AK 99508

Subject: Support for reducing the Cape Igvak Interception fishery (Proposal 60)

Dear Alaska Board of Fisheries,

At the 1999 Alaska Board of Fisheries meeting the attached report, by AK Fisheries Consulting, was prepared for and submitted by Chignik Seiners Association (CSA). At the time I was the CSA executive director. While CSA is no longer an active organization, I find the arguments for reducing the Chignik allocation in the Cape Igvak Management Plan just as compelling as they were then. In recognition of such, the 1999 report is submitted for your review. Updated version of the tables and figures will be provided during the Board meeting.

Thank you

Sincerely,

Chuck McCallum



The Cape Igvak Salmon Management Plan – An Artifact of the Kodiak Sockeye Salmon Rebuilding Era?

By

Bruce M. Barrett

Technical Report No. CSA-951

Prepared for:

Chignik Seiners Association
P.O. Box 46
Chignik, Alaska 99564

Prepared by:

AK Fisheries Consulting
POB 3775
Soldotna, Alaska 99669
and
P.O. Box 322
Lakeside, Montana 59922

January 1999



ACKNOWLEDGEMENTS

The Chignik Seiners Association (CSA) provided funding for this report. Appreciation is due the Alaska Department of Fish and Game (ADF&G) and in particular, the Kodiak staff of the Commercial Fisheries Management and Development Division for supplying most of the fisheries performance data. Kodiak ADF&G biologists Dave Owen, Dave Prokopowich, Patricia Nelson, and Wayne Donaldson were most helpful in responding to data requests and questions. I thank Chuck McCallum (CSA) and Matt Siemion (CSA) for administrative assistance and document reviews. Editorial comments were received from Chignik fishers: Ernie Carlson, Al Anderson, Jason Alexander, and others.



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Executive Summary

Authored by the Chignik Seiners Association, Proposal 111 calls for a three-year phaseout of the Cape Igvak Salmon Management Plan. In deciding the merits of Proposal 111, the State Board of Fisheries should be aware of the following:

1. Fifty years before Kodiak began fishing migrant sockeye salmon in the Cape Igvak area, Chignik commercial and subsistence fishers were fully utilizing the two local sockeye runs into Black and Chignik Lakes.
2. In 1964, a Kodiak interception fishery on Chignik bound sockeye salmon began in the Cape Igvak area (Lechner 1971).
3. In the 1960's and 1970's, Chignik sockeye runs were healthy, Chignik fishers were relatively wealthy, Kodiak sockeye runs were severely depressed, and the Cape Igvak fishery provided an opportunity to redistribute revenue away from Chignik to Kodiak.
4. In 1978, the Board allocated 15% of the available Chignik sockeye harvest to Kodiak for economic reasons, and the Board assumed from a 1969 ADF&G tagging study that 80% of the Cape Igvak catch was Chignik fish.
5. The results of the 1969 ADF&G tagging study for the Cape Igvak area were misreported. Instead of 80%, the composition was 91% Chignik bound sockeye salmon. The error effectively assigned Kodiak a 17% economic allocation and increased the cumulative (1978-98) number of Chignik sockeye salmon in the Cape Igvak Section catch from 3,695,000 to 4,203,000, a difference of more than 0.5 million sockeye salmon.
6. Chignik permit prices and salmon catch values are now at record lows. From the 1978-1982 period, catch revenues for Chignik have dropped 31%, while Kodiak revenues are currently, averaging 39% higher (Figure 1). Chignik permit values for the 1994-1998 period are down 35 percent from the 1983-1987 average (Figure 2). Kodiak permits are 2% higher.

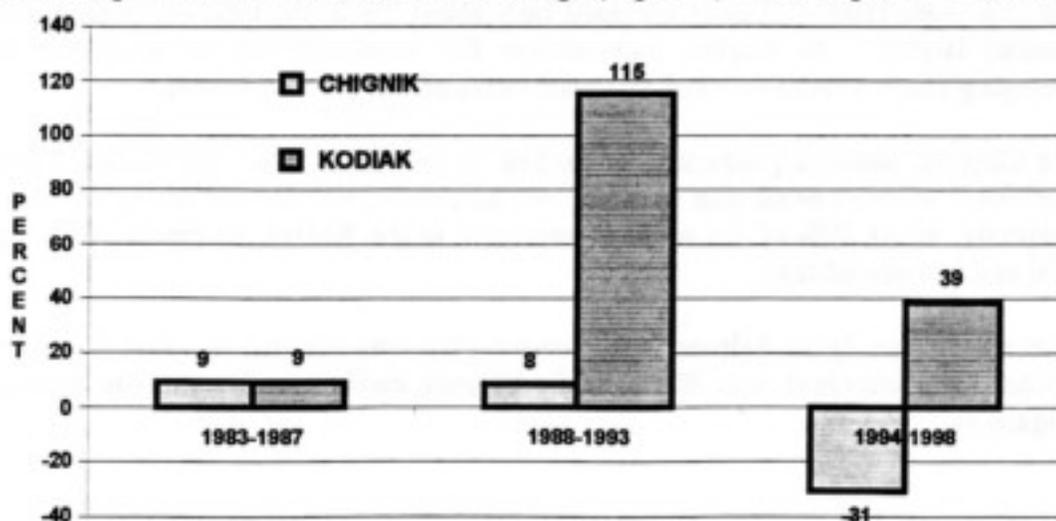


Figure 1. Percent change in the average ex-vessel value of purse seine catches from the baseline period of 1978-1982 for Chignik and Kodiak.

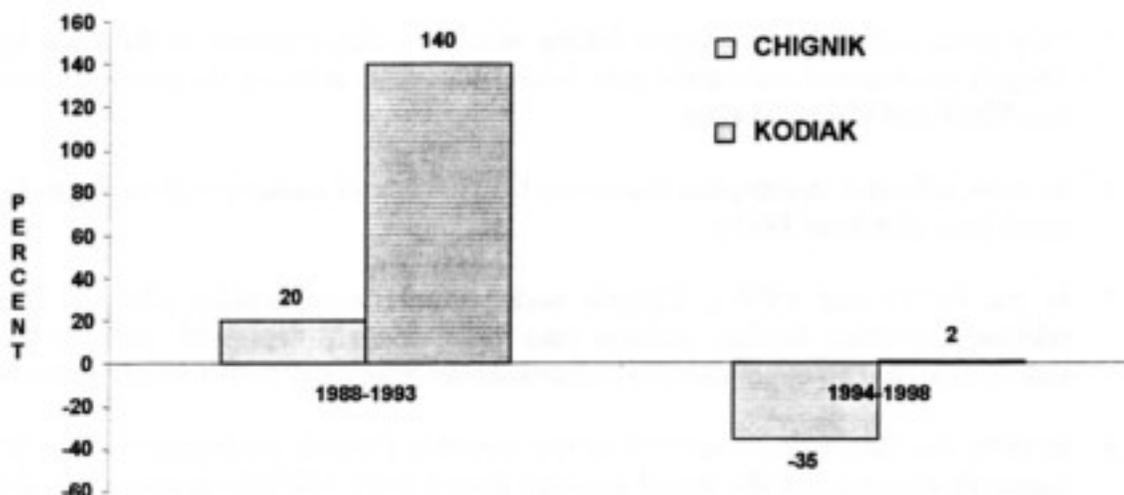


Figure 2. Average percent change in purse seine permit value from the baseline period of 1983- 1987 for Chignik and Kodiak.

7. From 1973 through 1977, Chignik averaged a 3.1:1 sockeye catch advantage over the Kodiak purse seine fishery. Chignik no longer has an advantage. Kodiak seiners surpassed Chignik in the late 1980's and are now averaging a 1.6:1 sockeye catch advantage (1994-98).
8. Alternative, non-salmon fisheries resources are on an economic slide in Chignik and for the last five years (1993-97) have averaged only about 4% of the total ex-vessel value of fish product landed. At Kodiak, non-salmon fish resources are an economic mainstay, averaging about 65% of the total ex-vessel value of fish product landed.
9. At Chignik, sockeye production is limited to two local runs. At Kodiak, there are 39 significant sockeye-producing streams, two hatcheries, and several newly developed runs. Currently, about 20% of the sockeye harvested in the Kodiak Archipelago are from non-wild and introduced runs.
10. Since the Cape Igvak Salmon Management Plan was adopted in 1978, Kodiak sockeye catches have increased over 800%, while Chignik catches are fractionally higher at 41% (Figure 3).

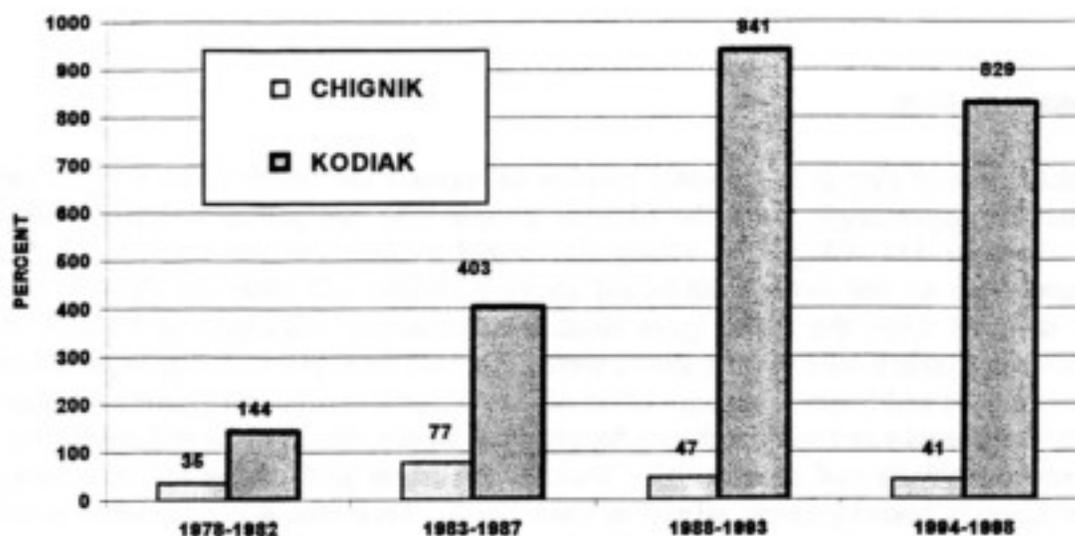


Figure 3. Annual percent change in sockeye salmon catch numbers from the baseline period of 1973-1977 for Chignik and Kodiak.

11. Chignik sockeye salmon are no longer a major component of the total sockeye catch for Kodiak. For the 1973 -1977 period, Chignik fish at Cape Igvak comprised about 23% of the total Kodiak sockeye catch (Figure 4). Now, Chignik sockeye salmon average 4%.

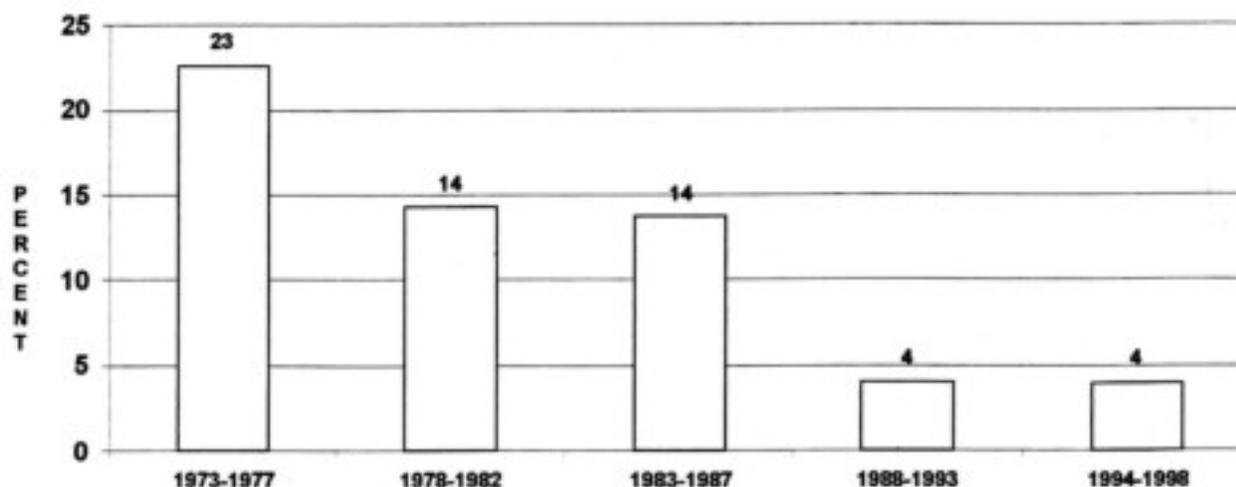


Figure 4. Average percent contribution of Chignik sockeye salmon harvested at Cape Igvak to the total Kodiak Management Area sockeye catch, 1973-1998.

12. The Kodiak sockeye salmon fishery is healthy with recent catches at or near record highs. In comparison, Chignik fishery revenues are at a 20-year low, and the economic severity of the Chignik salmon fishery is the principle reason for Governor Knowles declaring Chignik an economic disaster area in 1997 and 1998.



Recommendation

The Alaska Board of Fish is in a pivotal position to improve the health of the Chignik salmon fishery and correspondingly, help the Chignik people who are primarily Native Alaskans. Through Proposal 111, Chignik is asking the Board to phaseout the Cape Igvak Salmon Management Plan so that more south-bound sockeye salmon will enter the Chignik terminal fishery. In 1978 when the Board gave Kodiak an economic allocation of Chignik bound sockeye salmon, Kodiak wild salmon stocks were depressed from years of over exploitation and under escapements and Statewide, many believed that Chignik was too prosperous. Kodiak now has healthy wild stocks and two hatcheries for stocking barren lake systems and enhancing wild sockeye runs. Socially and economically, there is no longer justification for an interception fishery on Chignik bound sockeye salmon at Cape Igvak. Therefore, it is reasonable to end the Cape Igvak fishery.



Introduction

The Chignik Management Area (CMA) lies on the south side of the Alaska Peninsula from Kilokak Rocks on the north end to Kupreanof Point (Figure 5). The area has five year-round villages: Ivanof Bay, Perryville, Chignik, Chignik Lagoon, and Chignik Lake. Most of the 483 village residents, about 76%, are Native Alaskans (HDR Alaska, Inc. 1998). Salmon fishing is the economic mainstay for the CMA, providing the cash income for local families. Subsistence fishing and hunting is the primary source of food for nearly all local households (Scarborough and Fall, 1996).

Commercial salmon fishing in the CMA began in the 1880's (Scarborough and Fall, 1996). By 1911 the Chignik salmon fishery was fully recruited with about 30 fishing traps in Chignik lagoon and more operated from Chignik Bay northeast to Aniakchak. The target catch was the sockeye salmon runs into the Chignik Lakes. When traps were prohibited in 1959, purse seining became the exclusive harvest method and is still today.

Chignik is the only salmon management area on the south side of the Alaska Peninsula managed exclusively for local fish (ADF&G, 1996). To the north of Chignik is the Kodiak Management Area where fishers harvest Kodiak local runs and sockeye bound for Upper Cook Inlet. From June through late July in the Cape Igvak Section, Kodiak fishers also target sockeye salmon bound for Chignik.

The Kodiak Cape Igvak Section interception fishery is a relatively new fishery, developed in the 1960's and 1970's when the Kodiak sockeye runs were weak from years of overexploitation and under escapement, and Chignik sockeye runs were healthy (ADF&G, 1970; Lechner, 1971; D. Prokopowich, ADF&G, Kodiak, pers. comm., December 1998).

In the late 1970's, many people believed, in particular, Kodiak fishers and the Legislature, that Chignik fishers were much too wealthy and revenues should be shared (J. Huntington, Board Meeting, April 1978). When the Fish and Game Board met in April 1978, the consensus was: (1) Kodiak needed an economic allocation, (2) Chignik had too much revenue and; (3) the Cape Igvak sockeye fishery on Chignik bound stocks could re-distribute some of the wealth. The Board wrestled with various alternatives for ensuring a Kodiak harvest of Chignik bound sockeye salmon. These included fishing time ratios and allocations from 5% to 15% of the available Chignik catch. The Board chose a 15% allocation coupled with escapement and harvest priorities for Chignik. When the decision was made, the Board acknowledged: (1) that Cape Igvak was a relatively new fishery and; (2) that there was a policy against expanding intercept or cape fisheries. However, the Board justified the allocation as an appropriate move to "more evenly distribute the income" from the Chignik area over a greater number of people.

Did the Board of Fish and Game by its 1978 action intend to grant Kodiak seine fishers an exclusive and perpetual right of fishery at Cape Igvak? The transcripts covering that meeting suggest that this was not the case and that the Cape Igvak fishery could be reconsidered by future Boards.



At its meeting in Kodiak in January 1999, the Alaska Board of Fisheries will consider Proposal 111 which questions whether the Cape Igvak Salmon Management Plan is still justified and asks for a three-year phaseout of the sockeye fishery under that plan. In evaluating the merits of Proposal 111, the Board should examine the Kodiak and Chignik sockeye fisheries in detail, reviewing the history of the Igvak fishery, wild stock status, alternative non-salmon fishery opportunities, limited entry permit and catch values, resident participation, permit use, effort, supplemental production, and processor stability.

This report provides background information on the Cape Igvak sockeye fishery from its development to the present and a comparative social, economic, and biological evaluation of the Kodiak and Chignik Management Areas relative to the Cape Igvak fishery issue.

History

The Cape Igvak area sockeye fishery developed during the 1964 season (ADF&G 1970). Reportedly, only a "few" purse seine vessels operated there, and catches were "minimal". Three years later, 1967, catch and effort levels were increasing to where ADF&G considered the fishery a potential threat to migrant Chignik stocks (Lechner 1971). In 1968 and 1969, the Department conducted tagging in the Cape Igvak area and determined that most of the June and July sockeye catch was Chignik bound fish (ADF&G 1970; J. Lechner, ADF&G, BOF&G testimony, 4/13/78).

From 1964 through 1973, the Cape Igvak area was managed according to set fishing periods that usually allowed seining five days a week (Table 1). In 1974, the State Board of Fish and Game constrained the Igvak fishery to equal fishing time with Chignik. This continued through 1977. In 1978, the Board allocated 15% of the total available Chignik catch through July 25th to the Cape Igvak area fishery and concurrently, set a standard 80% Chignik stock composition on the catch. Also the Board established several guidelines to ensure a harvest preference for Chignik seiners and achievement of escapement goals. For the post July 25th period at Cape Igvak, ADF&G was free to manage the area for local pink, chum, and coho stocks. Presently, the Cape Igvak June through July 25th sockeye fishery is still managed under the terms and conditions of the 1978 Board adopted Cape Igvak Management Plan.

Stock Composition – Cape Igvak

Tagging Studies

Stock identification information on the Cape Igvak Section pre-July 26th sockeye harvest is limited. Two ADF&G tagging studies have been conducted, one in 1968 and the other in 1969. The 1968 tagging entailed the release of 325 fish on 22 June in the Cape Igvak area (ADF&G, 1968). From those 325, five recoveries were made: 4 in Chignik and 1 in Cook Inlet. ADF&G concluded that the 1968 study was statistically invalid because too few (5) tagged fish were recovered. However it was summarized, "that two stocks of fish comprised (Chignik and Cook Inlet) the commercial catch at Igvak."

A second tagging study, which occurred in 1969 in the area of Cape Igvak, entailed the release of a total of 791 sockeye salmon over a three-week period (ADF&G, 1970). The first group of



fish were tagged on 14 June, the second on 28 June, and the third on 6 July. tagged, all but six were released on 28 June (362) and 6 July (423). In total, 161 tags were recovered, and from those, ADF&G summarized that 80% of the fish at Cape Igvak were Chignik origin.

For more than 20 years, regulation of the Cape Igvak pre July 26th fishery has been founded on the premise that 80% of the sockeye harvested in the Cape Igvak Section are Chignik bound fish (Brennan 1998). Unfortunately, the 80% stock estimate is inaccurate. This is because the actual tagging data does not support the 80% estimate but rather a 90+% Chignik stock component (Table 2). In the original analysis, ADF&G included 12 tagged fish returns from the Cape Igvak Section. Since the tagging was done in the "area of Cape Igvak " and Cape Igvak is within the Cape Igvak Section and there are no sockeye systems within the Cape Igvak Section, the 12 recoveries should have been excluded. Corrected, Chignik stocks represent 90% of the total tagged fish recoveries based on 127 tags collected in the Chignik catch. If eight (8) tagged fish recovered from the Chignik escapement are included, the Chignik component at Cape Igvak is about 91% (Figure 6).

The corrected results of the 1969 ADF&G study indicate that the Chignik component of the Cape Igvak Section sockeye catch has been under estimated by about 13% since 1978. This translates to a total miss-assignment of about 510,000 Chignik bound sockeye salmon and an allocation for Kodiak of not 15% but 17% for the Cape Igvak fishery from 1978 through 1998.

Sockeye Catch Numbers and Effort

Since 1978, pre July 26th sockeye catches in the Kodiak purse seine fishery have increased much more than the Chignik catches (Table 3; Figure 7). At Chignik, the sockeye catch has increased about 48% from an average of 751,000 fish (1973-77) to 1,114,000 fish (1994-98). At Kodiak, the purse seine catch has increased 660% from a 240,000 fish average (1973-77) to a 1,825,000 fish average (1994-98). The Cape Igvak sockeye catch has also increased and currently, is an average 64% higher.

While Cape Igvak sockeye catches have increase since 1978, Chignik sockeye salmon are no longer a major component of the total catch for Kodiak. For the 1973 -1977 period, Chignik fish at Cape Igvak averaged about 23% of the entire Kodiak sockeye catch (Figure 4). Currently, Chignik sockeye salmon are an average 4% of the total.

In the Cape Igvak Section, fishing effort has increased since 1977 (Table 4). Pre 1978 about 22% of the seine fleet made at least one delivery from fishing Igvak waters whereas more currently, the average is about 39%. While more of the Kodiak purse seine fleet is at Cape Igvak than before, fewer purse seiners are solely fishing there. In the last 10 years, an average of less than one purse seiner has fished exclusively at Cape Igvak.

In 1997 and 1998, the Chignik early run failed. As a consequence at Cape Igvak, there was no pre July 26 fishing in 1997 and only minor opportunity with about 5% of the KMA purse seine fleet participating in 1998 (Table 4).



Permit and Catch Values

The State Commercial Fisheries Entry Commission (CFEC) has record of Kodiak and Chignik purse seine permit sales going back as far as 1982 (Tingley, 1998).

Chignik permits have dropped in value from the mid-1980's when they were averaging about \$320,000 (1983-87) to a current average price of about \$207,000 (1994-98) (Table 5). This represents a 35% reduction (Figure 2). In comparison, Kodiak seine permit values have risen slightly from the mid-1980's average price of \$42,000 (1983-87) to the current average price of \$43,000 (1994-98), a 2% increase. At present, Chignik and Kodiak purse permits are selling at record low values, with 1998 prices averaging about \$185,500 and \$30,400, respectively.

Chignik purse seine catch revenues have fluctuated dramatically since 1970. The average annual landed catch value for Chignik seine harvesters climbed from the mid-1970's, peaked in the late 1980's and are currently at near record lows (Table 5). From 1973 through 1977, Chignik purse seine catches averaged about \$71,000, from 1978 through 1993 \$167,000, and more currently, 1994 through 1998 \$109,000. In the last two years (1997-98) purse seine catches have averaged \$74,4000.

While the value of Chignik permits and catches has declined over the last five years, the ratio of catch value to permit value has fluctuated relatively little in the last 15 years (Table 5). From 1983 through 1987, a Chignik purse seine permit sold for twice the average catch value. From 1994 through 1998, permit value still averaged twice the catch value (2:1).

Kodiak purse seine catch values have risen substantially since the early 1970's. From 1973 through 1977, the average seine catch was worth \$25,000, from 1978 through 1993 \$89,000, and more currently, 1994 through 1998 \$84,000 (Table 5).

Although Kodiak purse seine catch revenues have increased, the value of Kodiak purse seine permits has not increased at the same rate (Table 5). From 1978 through 1982, the average catch value was 50% higher than permit value (1:0.7) whereas in the most recent five-year period, 1984-1998, the average catch was worth twice the permit value (1:0.5). In 1998, a KMA seine permit averaged \$30,400, and the catch \$102,900.

The average annual landed catch value at Chignik is approaching that of the Kodiak purse seiners (Table 5). From 1978 through 1987, the Chignik seiners averaged 160% more revenue. However for the last 11 years (1988-98) the difference has dropped to an average of 30%. In two of the last 10 years Kodiak seiners surpassed Chignik in average catch revenue. The first was the M/V Exxon Valdez oil spill year of 1989 and in that year, Kodiak received a catch settlement worth 8% more than the Chignik catch; the second was in 1998 when Kodiak purse seiners averaged a 17% higher catch revenue than Chignik.

Residency and Permit Activity

Most of the Chignik (82%) and Kodiak (75%) purse seine permit holders are Alaska residents (Table 6). Nonresidents account for about 18% of the Chignik and 25% of the Kodiak purse seiners.



Over the last 10 years (88-98), more Chignik purse seiners have fished proportional to the number of permits available than have Kodiak purse seiners (Table 6). For Chignik, the average is about 97%, while for Kodiak 76%. In 1998, fewer purse seine permit holders fished in Chignik and Kodiak than any other time in the last 20 years. Of the 102 Chignik permits available, 85 were active in 1998, equating to an 83% participation rate. Of the 384 Kodiak purse seine permits available, 199 or 52% were active in 1998.

Alternative Fish Resources

Salmon are the backbone of the Chignik area economy, contributing about 90% of the fish revenue in the last 10 years (Table 7). Alternative, non-salmon fisheries resources are of lesser importance and are economically declining in value. From 1988 through 1992, Chignik non-salmon fish landings averaged \$2.4 million. In the last five years (1993-97), the average was about \$0.5 million, an 80% reduction from the 1988-92 period.

Salmon are also highly important to the Kodiak area economy, providing about 56% of the fisheries revenue for the last 10 years (Table 7). Non-salmon fisheries resources contribute substantially to the Kodiak economy at the rate of about \$58 million annually. From 1988 through 1992, the value of non-salmon landings averaged \$55.4 million and in the last five years (1993-97) about \$60.2 million.

Overall, Chignik has experienced a more precipitous drop in the value of non-salmon fisheries resources than Kodiak. In the five years prior to 1993, Kodiak had about 23 times more value landed than did Chignik, and in the more recent five-year period, 1993-97, Kodiak dwarfed Chignik even more in non-salmon fisheries revenue by 131:1 (Table 7).

Pacific Gray Cod

At Chignik, the developing Pacific gray cod fishery has provided additional fishing opportunity to about 17 Chignik salmon permit holders (A. Anderson, Chignik, pers. comm., December 1998). In 1998, about six of the participants made a profit and the rest were at or below the break-even point due to new gear, extra fuel, and insurance costs. In total, about 50% of the boats in the fishery were from Chignik. The balance was nearly all from Kodiak and Sandpoint. The 1998 harvest totaled 5.7 million pounds, and the ex-vessel or delivery price averaged \$0.18/lb (D. Jackson, ADF&G, Kodiak, pers. comm., January, 1999). A floating processor moored in Anchorage Bay did all the buying. The 1999 cod quota is 8.2 million pounds.

At Kodiak in the 1998 fishery, a total of 8.1 million pounds of Pacific gray cod were landed in the State waters fishery there at an average price of \$0.22/lb (D. Jackson, ADF&G, Kodiak, pers. comm., January, 1999). Nearly all of the 1998 participants were Kodiak residents (95%). Twelve shore-based plants handled the product: 11 on Kodiak Island and 1 at Homer. For 1999, the harvest quota is 11.7 million pounds.

Chignik fishers believe that with some fine-tuning particularly with respect to lengthening the season and encouragement of shore-based processing and local hire, the Pacific gray cod fishery will provide an economic boost to Chignik especially at a time when the salmon fishery is on the downside.



Processor Stability

Kodiak has a relatively stable salmon processor base. In the past 10 years (1988-98), the number of salmon processing plants at Kodiak has remained relatively static at about 15 (D. Prokopowich, ADF&G, Kodiak, pers. comm., December 1998). In contrast, Chignik processor numbers have been far from stable and are declining (Table 8). An average of 12.6 processors operated in the Chignik area from 1984 through 1988, 7.8 from 1989 through 1993, and 5.2 from 1994 through 1998. Due to poor fishing and market conditions only two processors operated at Chignik in 1997 and 1998.

Sockeye Production

Wild Stocks

In the CMA, commercial sockeye production is limited to two wild stocks in the Chignik Lakes drainage, which have a combined escapement goal of 650,000 fish (Table 9). The estimated average harvest potential for these runs combined is 1.6 million fish based on the escapement goal and an assumed 3.5:1 return per spawner.

From 1973 through 1998 in the CMA, an average of 1.4 million sockeye salmon has been harvested annually in terminal wild-stock fisheries (Table 10). The recent five-year (1994-98) average, also 1.4 million fish, is about 40% more than the 1973-1977 average of 1.0 million. The 1997 and 1998 sockeye harvests are below average at 0.8 and 1.1 million fish, respectively. The KMA is highly diverse in wild stock sockeye production with 39 significant sockeye salmon producing streams (Brennan 1998). A total of five Kodiak sockeye runs have escapement goals in excess of 100,000 fish (Table 9). Overall, the wild stock escapement goal is an indexed 2 million fish and the harvest potential amounts to 5.4 million sockeye salmon (Prokopowich et al. 1996; Brennan 1998).

Since 1973 Kodiak has averaged a wild stock harvest of 2.0 million sockeye salmon (Table 10). The current five-year (1994-98) harvest has averaged 3.0 million fish, 650% more than the 1973-1977 average of 0.4 million. The 1997 and 1998 sockeye harvests were 2.1 million and 3.0 million, respectively.

Supplemental Stocks

Chignik has no salmon hatcheries or barren lake systems that offer sockeye rearing habitat or out-stocking potential (D. Owen, ADF&G, Kodiak, pers. comm., December 1998). Currently, the focus of the Chignik Regional Aquaculture has been to improve wild stock management through escapement goal refinement, habitat evaluation and protection, and smolt monitoring.

Kodiak sockeye production is not limited to wild stock runs. Two hatcheries operated by the Kodiak Regional Aquaculture Association (KRAA) release sockeye fry, fingerlings, and presmolt into a variety of barren and wild stock lakes and marine estuary annually on Kodiak and Afognak Islands. In 1998, the release totaled about 5.9 juvenile sockeye salmon (S. Honnold, ADF&G, Kodiak, pers. comm., December 1998).

Through efforts by ADF&G and KRAA, Kodiak sockeye harvest numbers are increasing as a direct result of successful introductions and hatchery operations (Table 10). Prior to 1977 only



wild sockeye stocks were harvested in the KMA. In 1978 about 3% of the total KMA sockeye harvest was from the introduced Frazer Lake run. Production from that system continued to grow and in 1991, the Frazer run provided a 1-million fish harvest in the Kodiak Alitak Bay District. In the last five years (1994-98) with the contribution of the Frazer Lake run, the new Spiridon run and several others, KMA commercial fishers have harvested about 3.6-million sockeye salmon of hatchery and introduced origin; annually, the average harvest has been 0.7 million fish. This represents nearly 20% of the total KMA sockeye catch.

All Stocks

Since the Cape Igvak Management Plan was adopted in 1978, Kodiak sockeye production has grown exponentially, while Chignik's growth is fractionally higher. Based on catch numbers, sockeye production at Chignik is currently averaging 41% higher than during the 1973-77 period. In comparison, Kodiak's sockeye production has increased more than 800% (Figure 3).

Recommendation

Commercial salmon fishing and processing is the largest and essentially the only industry in the Chignik area providing about 90% of the income and jobs (HDR Alaska, Inc. 1998). Chignik has no alternatives when salmon runs and market conditions deteriorate which has occurred in the last five years. Many of the Chignik residents are now finding themselves unable to make a reasonable living salmon fishing. This is not surprising, as Governor Knowles has declared Chignik an economic disaster area in 1997 and 1998.

The Alaska Board of Fish is in a pivotal position to improve the health of the Chignik salmon fishery and correspondingly, help the Chignik people who are primarily Native Alaskans. Through Proposal 111, Chignik is not asking for partial harvest rights on any of the 39 Kodiak sockeye runs including the Frazer and Spiridon Lakes runs developed by ADF&G. Rather, Chignik is asking the Board to phaseout over the next three fishing seasons, the Cape Igvak Salmon Management Plan so that more south-bound sockeye salmon will enter the Chignik terminal fishery. In 1978 when the Board gave Kodiak an economic allocation of Chignik bound sockeye salmon, the Kodiak sockeye runs were depressed from too many years of over-exploitation and under escapement. Kodiak now has highly productive wild stocks and hatcheries for planting barren lake systems and enhancing wild runs. Socially and economically, the Chignik sockeye allocation for the Cape Igvak fishery is no longer justified and therefore, it should be annulled.



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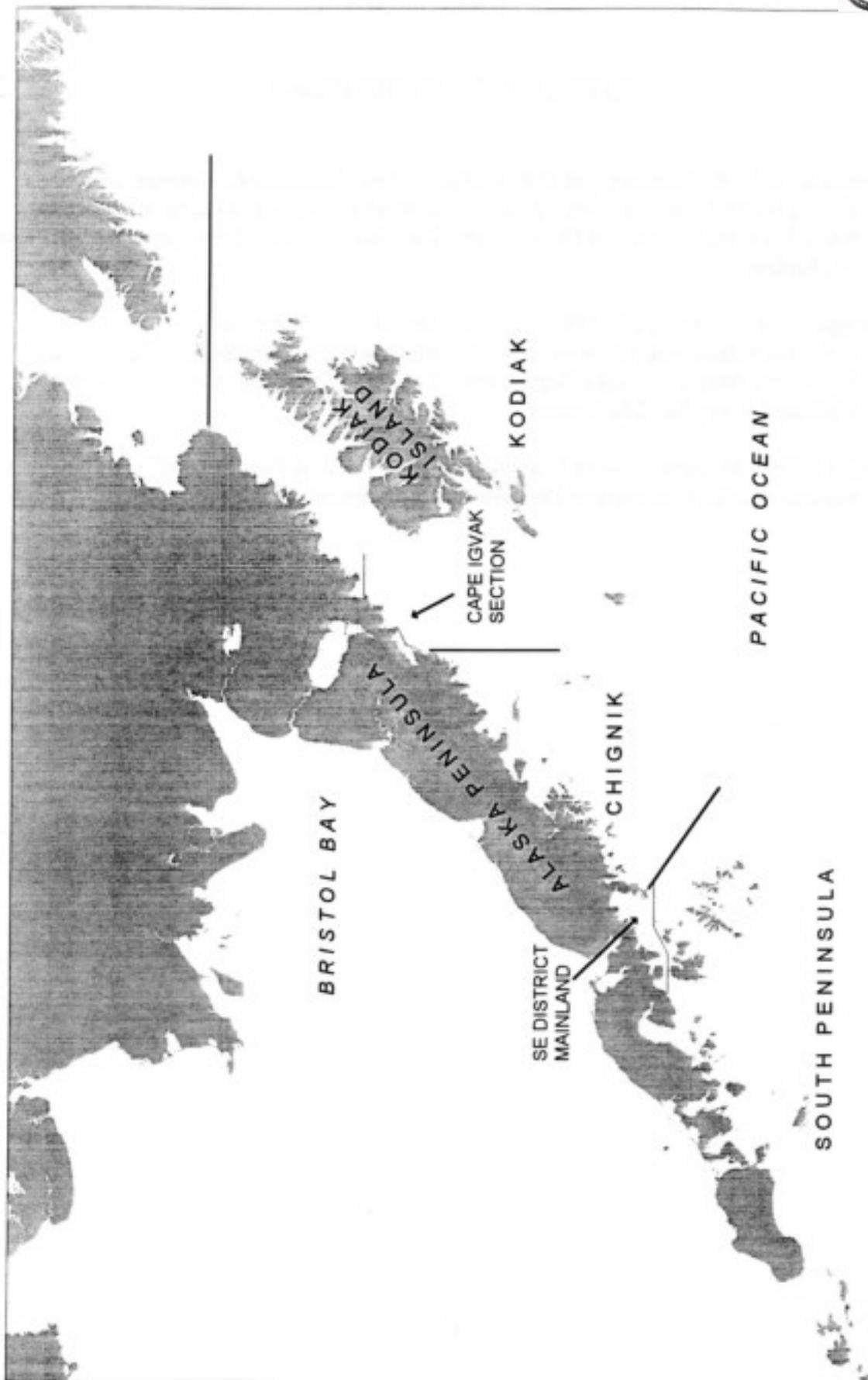


Figure 5. Map showing the location of the Chignik area relative to the Cape Igvak Section and other western Alaska areas.

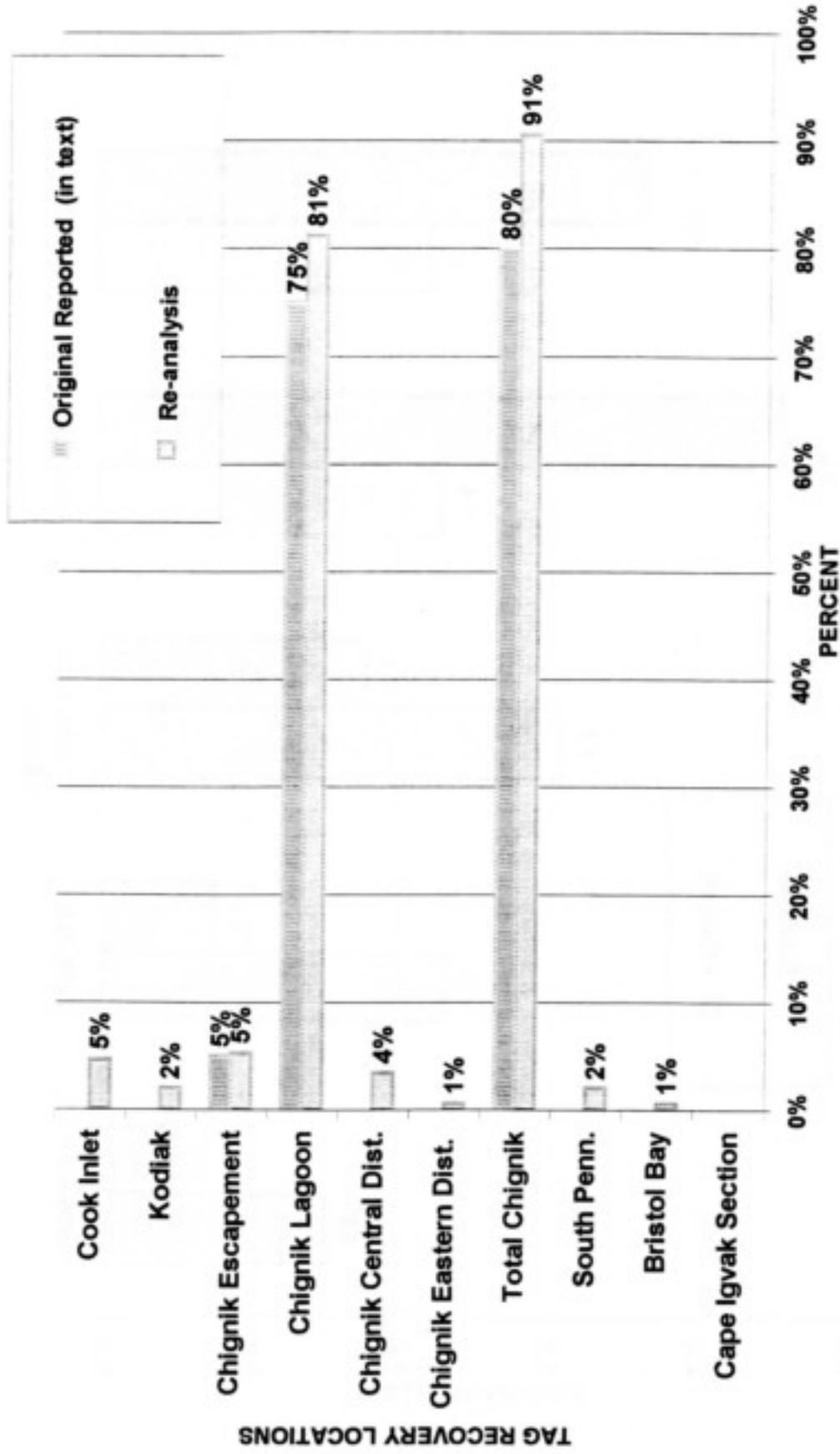


Figure 6. Results of the 1969 Cape Igvak sockeye salmon tagging study by ADF&G; original reported vs. re-analysis.

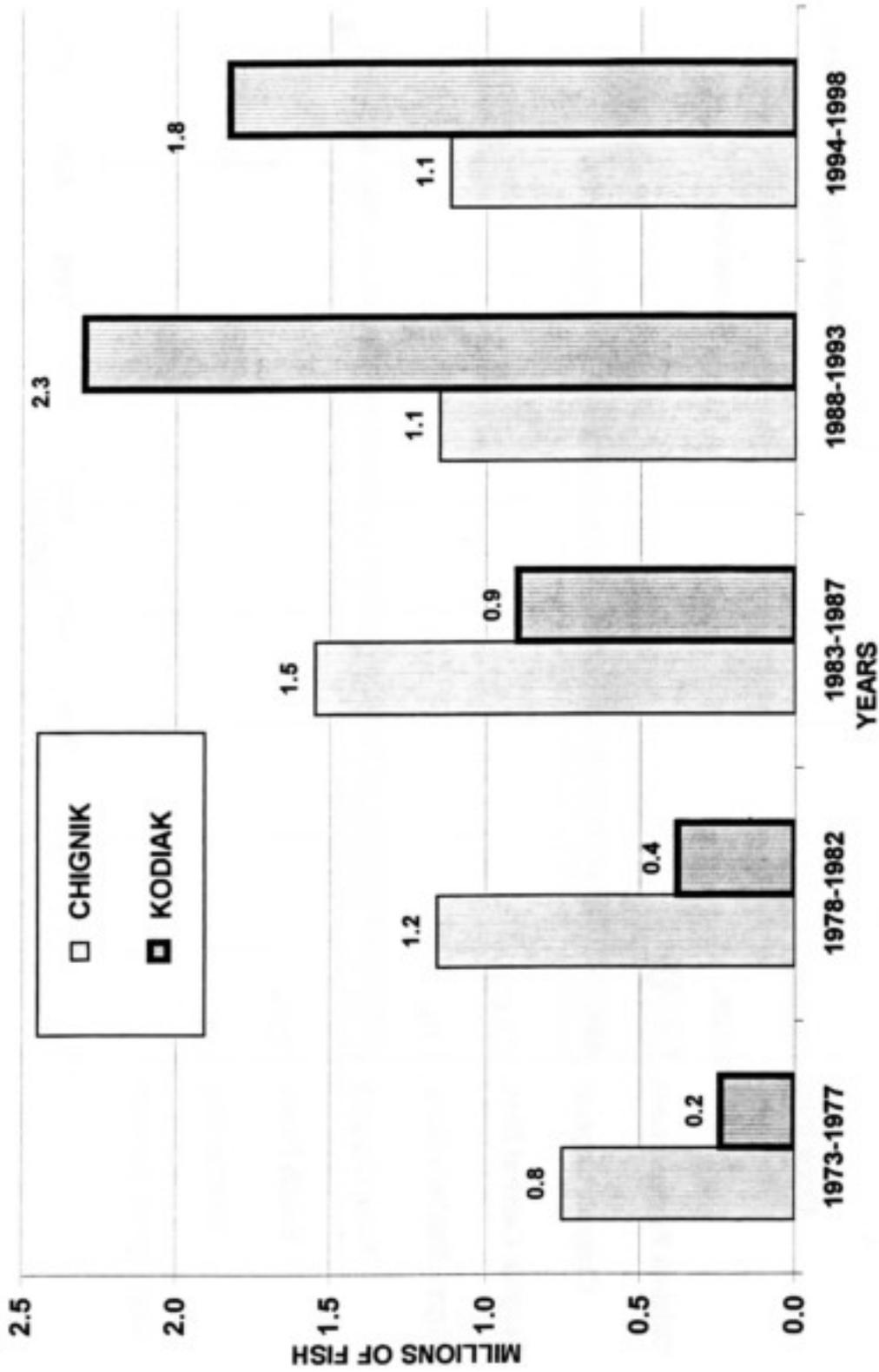


Figure 7. Average total sockeye catch in the pre-July 26th purse seine fisheries for Chignik and Kodiak, 1973-1998.



Table 1. Chronology of management strategies used for harvesting Chignik sockeye salmon in the Kodiak Management Area Cape Igvak Section, 1964-1998.

Management Strategy	1964 - 1973	1974 - 1977	1978 - 1998
Set Weekly Fishing Periods (about 5 days/wk.)	X		
Day to Day Fishing Time w/ Chignik Lagoon		X	
Chignik Escapement Priority	X	X	X
Allocation of Chignik Catch (%)			15%
Chignik Harvest Preference			X
Forecasted Chignik Catch <600k			X
Pre 7/8, no fishing until 300k Chignik catch			X
Post 7/8, no fishing until 300k Chignik catch & projected 600k Chignik catch			X
Forecasted Chignik Catch 600k or more & 1st run fails to develop & 600k Chignik catch not assured			X
Pre 7/8, curtailed fishing until 300k Chignik catch			X
Post 7/8, no fishing until 300k catch & projected 600k catch			X
Chignik 2nd Run Evaluation Period 6/26 - 7/9			X
Restrict fishery to prevent 2nd run over harvest			X
Priority Kodiak Local Stock Harvest			X
Pink, chum, and coho salmon			X

Source: ADF&G 1992; ADF&G 1998; D. Prokopowich, personal communication, ADF&G, Kodiak 12/8/98.



Table 2. Re-analysis of the 1969 Cape Igvak sockeye tagging study conducted by the Alaska Department of Fish and Game and reported to the State Board of Fish and Game in 1978.

Tag Recovery Locations											Summary			
Cape Igvak Section	Bristol Bay Peninsula	South	Chignik Management Area					Cook Inlet	Total	Chignik	Non-Chignik	Total		
			Eastern District	Central District	Chignik Lagoon	Chignik Escap.	Kodiak							
ORIGINAL ANALYSIS 1/											80%	20%	100.0%	
Text Reported ("Summary of Results")														
Analytical (in report table)														
Number	12	1	3	1	5	121	8	135	3	7	161	135	26	161
Percent	7.5%	0.6%	1.9%	0.6%	3.1%	75.2%	5.0%	83.9%	1.9%	4.3%	100.0%	83.9%	16.1%	100.0%
RE-ANALYSIS														
Total Recoveries excluding Escapement														
Number	1	3	1	5	121	127	3	141	127	14	141	127	14	141
Percent	0.7%	2.1%	0.7%	3.5%	85.8%	90.1%	2.1%	100.0%	90.1%	9.9%	100.0%	90.1%	9.9%	100.0%
Total Recoveries including Escapement														
Number	1	3	1	5	121	8	149	135	3	7	149	135	14	149
Percent	0.7%	2.0%	0.7%	3.4%	81.2%	5.4%	100.0%	90.6%	2.0%	4.7%	100.0%	90.6%	9.4%	100.0%

1/ Source: ADF&G (1970) and Lechner (1971)

Note: 1. A total of 791 sockeye were tagged and 12 were recaptured in the Cape Igvak Section; those 12 were not considered in the re-analysis as there are no sockeye systems in the Cape Igvak Section and the tagging location of Cape Igvak is in the Cape Igvak Section.

2. In 1978 BOF testimony, ADF&G staff stated: "Chignik fish at Igvak to be 80% on the low end...." (Jack Lechner, ADF&G Regional Supervisor, BOF Tape #35, April 1978).



Table 3. Number of sockeye salmon harvested in the pre July 26th purse seine fishery for Chignik and the Kodiak Management Areas and the Cape Igvak Section sockeye catch numbers by stock, 1973-1998.

Year	Purse Seine Pre- July 26th Catch (#s)		Cape Igvak Section (pre July 26)			
	Total Chignik Mgmt. Area	Total Kodiak Mgmt. Area	Total Catch	Stock Composition (#s)		Percent of Total Chignik Bound Sockeye Harvested 1/
				Chignik	other	
1973	769,258		71,685	57,348	14,337	6.6
1974	530,278	230,344	152,589	122,071	30,518	17.0
1975	115,984	43,539	29,544	23,635	5,909	16.7
1976	792,024	333,639	147,407	117,926	29,481	12.4
1977	1,547,285	350,808	161,065	128,852	32,213	7.5
1978	1,454,389	575,197	283,767	227,014	56,753	13.3
1979	794,504	178,525	17,437	13,950	3,487	1.6
1980	670,001	162,435	32	26	6	0.0
1981	1,606,300	655,659	353,139	282,511	70,628	14.1
1982	1,250,768	324,324	209,251	167,401	41,850	11.3
1983	1,450,832	598,193	397,560	318,048	79,512	15.9
1984	2,474,405	1,078,816	524,937	419,950	104,987	13.4
1985	696,169	814,367	154,534	123,627	30,907	14.2
1986	1,456,729	1,152,312	235,021	188,017	47,004	10.7
1987	1,659,615	840,562	401,883	321,506	80,377	15.1
1988	675,487	1,322,215	14,022	11,218	2,804	1.6
1989	496,044		Fishery Closed Due to M/V Exxon oil spill			
1990	1,205,575	2,376,721	134,632	107,706	26,926	7.5
1991	1,958,954	2,523,494	405,411	324,329	81,082	13.3
1992	1,054,309	2,671,625	190,448	152,358	38,090	11.7
1993	1,495,096	2,603,340	375,069	300,055	75,014	15.6
1994	1,632,435	1,305,228	312,787	250,230	62,557	12.4
1995	1,024,785	2,315,065	211,913	169,530	42,383	13.2
1996	1,710,249	2,644,495	385,409	308,327	77,082	14.4
1997	455,191	982,428	0	0	0	0.0
1998	746,709	1,876,241	11,016	8,813	2,203	1.0
AVERAGE						
1973-77	750,966	239,583	112,458	89,966	22,492	12.0
1978-82	1,155,192	379,228	172,725	138,180	34,545	8.1
1983-87	1,547,550	896,850	342,787	274,230	68,557	13.9
1988-93	1,147,578	2,299,479	223,916	179,133	44,783	9.9
1994-98	1,113,874	1,824,691	184,225	147,380	36,845	8.2

1/ Estimates derived by ADF&G; percents derived by dividing 80% of the Igvak pre July 26th catch by the sum of the total CMA pre July 26th catch, 80% of the Igvak catch, and 80% of various fractions of the SE Mainland District pre July 26th catch.

Source: Owen and Sarafin (in-prep.) and Donaldson (1998).



Table 4. Number of seine limited entry permits fished pre July 26th in the Cape Igvak Section and remainder of the Kodiak Management Area, 1974-98.

Year	Cape Igvak Section	Kodiak less Cape Igvak Section	Kodiak	Percent of All Kodiak Permits Fished at C. Igvak	Number of Permits Fished <u>Only</u> at C. Igvak
1974	59	214	220	27%	6
1975	45	229	233	19%	4
1976	54	333	333	16%	0
1977	87	315	316	28%	1
1978	131	359	361	36%	2
1979	93	362	362	26%	0
1980	Strike	345	345		
1981	109	318	318	34%	0
1982	155	215	275	56%	60
1983	147	329	329	45%	0
1984	170	285	287	59%	2
1985	129	260	262	49%	2
1986	91	277	277	33%	0
1987	172	284	285	60%	1
1988	43	316	316	14%	0
1989		Fishery closed due to M/V Exxon Valdez oil spill.			
1990	116	349	349	33%	0
1991	145	345	346	42%	1
1992	155	333	333	47%	0
1993	133	319	319	42%	0
1994	117	275	275	43%	0
1995	137	306	306	45%	0
1996	126	255	255	49%	0
1997	Closed	254	254		
1998	9	199	199	5%	0
AVERAGE					
1974-77	61	273	276	22%	3
1978-82	122	320	332	38%	16
1983-87	142	287	288	49%	1
1988-93	118	332	333	35%	0
1994-98	97	258	258	35%	0

Source: Donaldson (1996)



Table 5. Permit numbers fished, average permit values, and ex-vessel catch value for purse seine gear in the Chignik and Kodiak Management Areas, and a comparison of purse seine catch and permit values between those areas, 1970-98.

Year	CHIGNIK				KODIAK				Area Comparisons			
	Total Number of Permits	Permit Value Average (\$)	Catch Value Ex-vessel Average (\$)	Ratio Catch \$: Permit \$	Total Number of Permits	Permit Value Average (\$)	Catch Value Ex-vessel Average (\$)	Ratio Catch \$: Permit \$	Permit \$		Catch \$	
									Chignik:	Kodiak	Chignik:	Kodiak
1970	69		\$ 46,761				\$ 41,890					1: 0.9
1971	77		\$ 35,811				\$ 13,397					1: 0.4
1972	79		\$ 12,650				\$ 9,233					1: 0.7
1973	77		\$ 40,776				\$ 5,075					1: 0.1
1974	94		\$ 40,094		220		\$ 15,993					1: 0.4
1975	86		\$ 20,584		233		\$ 13,300					1: 0.6
1976	77		\$ 73,438		333		\$ 43,017					1: 0.6
1977	88		\$ 181,435		316		\$ 46,942					1: 0.3
1978	95		\$ 182,764		361		\$ 70,685					1: 0.4
1979	101		\$ 146,900		362		\$ 51,263					1: 0.3
1980	101		\$ 85,739		345		\$ 62,363					1: 0.7
1981	103		\$ 214,466		318		\$ 79,877					1: 0.4
1982	105		\$ 160,291		275	\$ 39,817	\$ 39,309		1: 1.0			1: 0.2
1983	100		\$ 117,058		329		\$ 30,239					1: 0.3
1984	101	\$ 322,500	\$ 215,381	1: 1.5	287		\$ 71,590					1: 0.3
1985	101	\$ 321,233	\$ 86,494	1: 3.7	262		\$ 46,337	\$ 57,762	1: 0.8	1: 0.1		1: 0.7
1986	100		\$ 184,475		277		\$ 37,036	\$ 92,696	1: 0.4			1: 0.5
1987	102	\$ 315,667	\$ 259,810	1: 1.2	285		\$ 43,365	\$ 79,814	1: 0.5	1: 0.1		1: 0.3
1988	102	\$ 360,000	\$ 272,069	1: 1.3	316		\$ 66,734	\$ 252,403	1: 0.3	1: 0.2		1: 0.9
1989	100	\$ 371,667	\$ 136,010	1: 2.7			\$ 139,269	\$ 146,502	1: 1.0	1: 0.4		1: 1.1
1990	101	\$ 416,667	\$ 245,314	1: 1.7	349		\$ 148,563	\$ 113,328	1: 1.3	1: 0.4		1: 0.5
1991	101	\$ 408,400	\$ 124,844	1: 3.3	346		\$ 122,800	\$ 77,511	1: 1.6	1: 0.3		1: 0.6
1992	101	\$ 403,100	\$ 151,429	1: 2.7	333		\$ 69,300	\$ 96,398	1: 0.7	1: 0.2		1: 0.6
1993	102	\$ 349,800	\$ 97,432	1: 3.6	319		\$ 61,600	\$ 94,927	1: 0.6	1: 0.2		1: 1.0
1994	99	\$ 238,300	\$ 119,557	1: 2.0	275		\$ 45,400	\$ 67,545	1: 0.7	1: 0.2		1: 0.6
1995	100	\$ 228,300	\$ 144,763	1: 1.6	306		\$ 50,400	\$ 135,769	1: 0.4	1: 0.2		1: 0.9
1996	100	\$ 194,500	\$ 131,699	1: 1.5	255		\$ 46,900	\$ 66,171	1: 0.7	1: 0.2		1: 0.5
1997	98	\$ 188,300	\$ 60,434	1: 3.1	254		\$ 41,700	\$ 48,842	1: 0.9	1: 0.2		1: 0.8
1998	85	\$ 185,500	\$ 88,335	1: 2.1	199		\$ 30,400	\$ 102,897	1: 0.3	1: 0.2		1: 1.2
Avg. 1973-77	84		\$ 71,265		276		\$ 24,865					1: 0.3
Avg. 1978-82	101		\$ 158,032		332		\$ 39,817	\$ 60,699	1: 0.7			1: 0.4
Avg. 1983-87	101	\$ 319,800	\$ 172,644	1: 1.9	288		\$ 42,253	\$ 66,416	1: 0.6	1: 0.1		1: 0.4
Avg. 1988-93	101	\$ 385,106	\$ 171,183	1: 2.2	333		\$ 101,381	\$ 130,510	1: 0.8	1: 0.3		1: 0.8
Avg. 1994-98	96	\$ 206,980	\$ 106,958	1: 1.9	258		\$ 42,960	\$ 84,245	1: 0.5	1: 0.2		1: 0.8

Source: Permit value data provided by AJ Tingley, 11/5/98, Commercial Fisheries Entry Commission, Juneau; 1998 permit values provided by: Denise Nakachi, 12/2/98, Commercial Fisheries Entry Commission, Juneau. All other information from W. Donaldson, 11/17/98, ADF&G, Kodiak.



Table 6. Numbers of permits fished and residency status for purse seine gear in the Chignik and Kodiak Management Areas, 1970-1998.

Year	Chignik			Kodiak			Area Comparison	
	Active # of Permits	Permit Ownership		Active # of Permits	Permit Ownership		Active Permits #'s Chignik: Kodiak	AK. Resident Chignik: Kodiak
		R	NR		R	NR		
1970	69	83%	17%					
1971	77	83%	17%					
1972	79	79%	22%					
1973	77	82%	18%					
1974	94	84%	16%	220		1: 2.3		
1975	86	84%	16%	233		1: 2.7		
1976	77	86%	14%	333		1: 4.3		
1977	88	84%	16%	316		1: 3.6		
1978	95	86%	14%	361		1: 3.8		
1979	101	86%	14%	362		1: 3.6		
1980	101	86%	14%	345		1: 3.4		
1981	103	85%	16%	318		1: 3.1		
1982	105	85%	15%	275		1: 2.6		
1983	100	84%	16%	329		1: 3.3		
1984	101	83%	17%	287		1: 2.8		
1985	101	84%	16%	262		1: 2.6		
1986	100	87%	13%	277		1: 2.8		
1987	102	87%	13%	285		1: 2.8		
1988	102	86%	14%	316	75%	25%	1: 3.1	1: 0.9
1989	100	84%	16%		75%	25%		
1990	101	84%	16%	349	74%	27%	1: 3.5	1: 0.9
1991	101	83%	17%	348	73%	27%	1: 3.4	1: 0.9
1992	101	84%	16%	333	73%	27%	1: 3.3	1: 0.9
1993	102	83%	17%	319	74%	26%	1: 3.1	1: 0.9
1994	99	83%	17%	275	75%	25%	1: 2.8	1: 0.9
1995	100	80%	20%	306	75%	25%	1: 3.1	1: 0.9
1996	100	80%	20%	295	75%	25%	1: 2.6	1: 0.9
1997	98	83%	17%	254	75%	26%	1: 2.6	1: 0.9
1998	85	82%	18%	199	74%	26%	1: 2.3	1: 0.9
Average								
1973-77	84	84%	16%	276			1: 3.5	
1978-82	101	86%	14%	332			1: 3.3	
1983-87	101	85%	15%	288			1: 2.9	
1988-93	101	84%	16%	333	74%	26%	1: 3.3	1: 0.9
1994-98	96	82%	18%	258	75%	25%	1: 2.7	1: 0.9

Source: Chignik data from Owen and Sarafin (in press); Kodiak data provided by D. Prokopowich, personal communication, 12/11/98, ADF&G, Kodiak.



Table 7. Approximate ex-vessel value, in millions of dollars, of fish product landed in the Chignik and Kodiak Management Areas, 1988-1998.

Year	Chignik		Total	Kodiak		Total	Area Comparison	
	Salmon	other		Salmon	other		Chignik:Kodiak	Salmon Chignik:Kodiak
1988	\$ 27.8	\$ 6.0	\$ 33.8	\$ 103.8	\$ 62.5	\$ 166.3	1: 3.7	1: 10
1989	\$ 13.6	\$ 2.4	\$ 16.0	\$ 61.0	\$ 39.2	\$ 100.2	1: 4.5	1: 16
1990	\$ 24.8	\$ 1.7	\$ 26.5	\$ 52.6	\$ 49.1	\$ 101.7	1: 2.1	1: 29
1991	\$ 12.6	\$ 0.9	\$ 13.5	\$ 37.0	\$ 59.9	\$ 96.9	1: 2.9	1: 67
1992	\$ 15.3	\$ 0.9	\$ 16.2	\$ 40.5	\$ 66.5	\$ 107.0	1: 2.6	1: 74
1993	\$ 9.9	\$ 0.6	\$ 10.5	\$ 38.6	\$ 42.9	\$ 81.5	1: 3.9	1: 72
1994	\$ 11.8	\$ 0.8	\$ 12.6	\$ 27.1	\$ 80.5	\$ 107.6	1: 2.3	1: 101
1995	\$ 14.5	\$ 0.2	\$ 14.7	\$ 53.9	\$ 51.5	\$ 105.4	1: 3.7	1: 258
1996	\$ 13.2	\$ 0.3	\$ 13.5	\$ 25.8	\$ 56.5	\$ 82.3	1: 2.0	1: 188
1997	\$ 5.9	\$ 0.4	\$ 6.3	\$ 18.8	\$ 69.8	\$ 88.6	1: 3.2	1: 175
1998	\$ 7.5		\$ 7.5	\$ 29.8		\$ 37.3	1: 4.0	
Avg. 1988-92	\$ 18.8	\$ 2.4	\$ 21.2	\$ 59.0	\$ 55.4	\$ 114.4	1: 3.1	1: 23
Avg. 1993-97	\$ 11.1	\$ 0.5	\$ 11.5	\$ 32.8	\$ 60.2	\$ 93.1	1: 3.0	1: 131

Source: W. Donaldson, memorandum, 11/17/98, ADF&G, Kodiak.



Table 8. Number of salmon processors operating in the Chignik Management Area, 1984-1998.

Year	Number	Year	Number	Year	Number
1984	20	1989	7	1994	7
1985	8	1990	5	1995	10
1986	10	1991	14	1996	5
1987	12	1992	8	1997	2
1988	13	1993	5	1998	2
Avg. (1984-88)	12.6	Avg. (1989-93)	7.8	Avg. (1994-98)	5.2

Source: Owen and Sarafin (in prep.)

Table 9. Listing of all wild and introduced Kodiak and Chignik sockeye salmon runs with a 100,000 or more fish escapement goal.

Kodiak			Chignik		
Run	Escapement Goal (1,000's)	Run Type	Run	Escapement Goal (1,000's)	Run Type
Karluk Early	150-250	Wild	Black Lake	400	Wild
Karluk Late	400-550	Wild	Chignik Lake	250	Wild
Upper Station Late	150-200	Wild			
Ayakulik	200-300	Wild			
Frazer	140-200	Introduced			
Uganik	80-120	Wild			

Source: Prokopowich et al. (1996) and Owen and Sarafin (1998b).



Table 10. Estimated sockeye salmon catch from natural producing systems and supplemental production from introductions, hatchery, and introductions, hatchery, and enhancement activities, Chignik and Kodiak Management Areas, 1974-98.

Year	Chignik Management Area (Numbers of fish)			Kodiak Management Area (Numbers of Fish)			Kodiak Management Area Catch in Percent		
	Natural Wild Stock Systems	Supplemental Production (Introduced/Hatchery/ Enhanced)	Total	Natural Wild Stock Systems	Supplemental Production 1/ (Introduced/Hatchery/ Enhanced)	Total	Natural Wild Stock Systems	Supplemental Production 1/ (Introduced/Hatchery & Enhanced)	Total
1973	870,354	0	870,354	167,341	0	167,341	100%	0%	100%
1974	662,905	0	662,905	418,761	0	418,761	100%	0%	100%
1975	369,593	0	369,593	136,418	0	136,418	100%	0%	100%
1976	1,163,728	0	1,163,728	641,484	0	641,484	100%	0%	100%
1977	1,972,207	0	1,972,207	623,468	0	623,468	100%	0%	100%
1978	1,576,283	0	1,576,283	1,041,446	30,336	1,071,782	97%	3%	100%
1979	1,049,497	0	1,049,497	604,930	28,805	631,735	96%	4%	100%
1980	859,966	0	859,966	596,221	55,173	651,394	92%	8%	100%
1981	1,839,469	0	1,839,469	1,178,770	110,210	1,288,980	91%	9%	100%
1982	1,521,696	0	1,521,696	1,128,561	76,232	1,204,793	94%	6%	100%
1983	1,824,175	0	1,824,175	1,202,321	29,668	1,231,989	98%	2%	100%
1984	2,660,619	0	2,660,619	1,931,906	18,533	1,950,439	99%	1%	100%
1985	922,151	0	922,151	1,711,650	131,535	1,843,185	93%	7%	100%
1986	1,845,834	0	1,845,834	3,146,617	41,652	3,188,269	99%	1%	100%
1987	1,898,938	0	1,898,938	1,794,193	8,626	1,792,819	100%	0%	100%
1988	795,841	0	795,841	2,488,231	210,406	2,698,637	92%	8%	100%
1989	1,159,287	0	1,159,287	1,919,701	708,864	2,628,565	73%	27%	100%
1990	2,063,650	0	2,063,650	4,523,046	725,293	5,248,339	86%	14%	100%
1991	1,895,995	0	1,895,995	4,723,909	980,132	5,704,041	83%	17%	100%
1992	1,277,449	0	1,277,449	3,930,103	237,774	4,167,877	94%	6%	100%
1993	1,697,361	0	1,697,361	3,793,474	584,214	4,377,688	87%	13%	100%
1994	1,618,973	0	1,618,973	2,190,757	687,266	2,878,023	76%	24%	100%
1995	1,724,045	0	1,724,045	3,558,391	926,530	4,485,321	79%	21%	100%
1996	1,958,353	0	1,958,353	3,986,948	963,442	4,970,390	80%	20%	100%
1997	769,683	0	769,683	2,104,787	400,873	2,505,660	84%	16%	100%
1998	1,054,172	0	1,054,172	3,003,308	619,786	3,623,094	83%	17%	100%
Averages									
1973-77	1,013,757	0	1,013,757	397,494	0	397,494	100%	0%	100%
1978-88	1,508,578	0	1,508,578	1,528,622	67,196	1,595,820	95%	5%	100%
1989-93	1,624,680	0	1,624,680	3,778,047	647,255	4,425,302	85%	15%	100%
1994-98	1,425,045	0	1,425,045	2,968,838	723,659	3,692,498	81%	19%	100%

1/ Supplemental production systems in the KMA include the Kitoi and Pillar Creek hatcheries, and Frazer, Sphidon, Crescent, Hidden, and L. Waterfall Lakes
Source: Donaldson 1998, Owens and Sarafin 1998.



December 12, 2019

Jason D. Alexander
213 Airport Road
Chignik, AK 99564



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

Subject: Cape Igvak Fishery

Dear Alaska Board of Fisheries:

Chignik's two sockeye salmon runs should no longer be require to provide Kodiak an interception fishery at Cape Igvak. Our early run and late run are in trouble, relatively weak, and there is no assurance that they will not remain that way for years to come. In 2017 we had a well below average sockeye catch and in 2018 no fishery at all on either run. Last season were unable to fish our early run, and the late run which did provide fishing opportunity did not make up for the absence of an early run season. This coming season, according to F&G, is expected to be poor as the harvest forecast is for less than a 500,000 thousand catch or about 1/3 of our long-term average. With no even-year pink fishery expected, 2020 has all the makings of another very poor season.

You cannot make this up, Chignik is in trouble. We need a shore-based processor and that will not happen unless we harvest more salmon. For about the last 10 years most of our catch has gone to Kodiak and Sand Point while Chignik sits without any processor or employment opportunity for our locals.

Kodiak's economy and salmon resources are healthy. They have major sockeye runs and two substantial hatcheries. Further there are more than 7 fish processors on Kodiak and numerous non-salmon industries ensuring broad job opportunities. There are no alternative jobs in the Chignik area—it is all salmon fishing or nothing. Anyone of you on the Board could find employment in any week in Kodiak. In Chignik you would remain unemployed and looking for the welfare door from the fall though spring months.

We need to recover and capture some good seasons to get back on our feet. End the interception fishery at Igvak. This fishery was established when Kodiak was doing poorly and now it has, for several decades, fully recovered.

I strongly support Proposal #60 but adjusted to a 0 percent allocation. Even 5% is too much of an allocation given Chignik's situation.

Sincerely,

Jason D Alexander
JASON D. ALEXANDER
(907) 717-5639



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

This proposal is insulting the idea that Kodiaks fleet intentionally misreport catch in the Cape Igvak section is just wrong. My name is Aaron Nevin. Being born in Kodiak to a commercial fisherman father I grew up fishing salmon on his seiner. I have continued on in my currently twenty year long career to buy a permit and run his boat after retirement. The seining season usually accounts for the majority of my annual income and is incredibly important to my family.



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

Adam Barker 41584 Manson Dr Homer, AK 99603 December 26th 2019 Chairman Reed Morisky Alaska Board of Fisheries -Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 My name is Adam Barker and I've been fishing in Kodiak Island since I was a child in 1988. I'm a third generation fisherman and now bring my two children fishing in the summer. I've been an owner operator for Kodiak salmon since 1999. I also have a tanner crab permit and will be fishing that this January. I respectfully request the Board reject proposal # 61 The increase of expected minimum harvest to Chignik is harmful to local stocks by risking over-escapement of local chums and pink salmon in the Igvak section. We should not risk biased decisions on allocating salmon for special groups who have not historically fished the capes but were strictly a lagoon fishery. Please reject this as a ill advised proposal deeming one small area more deserving of special treatment over the greater area and mixed species of samonoids. I hope the board continues to apply consistency in its application of he guiding policies such as the mixed stock fisheries policy, and he sustainable fisheries policy. Sincerely, Adam Barker



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

Dear Board of Fish Members, I am a second-generation Kodiak fisherman. My father started salmon fishing here in 1967, and I have setnetted since I was a toddler with my family, for my whole life. I took over the permit from my dad several years ago, and in 2016 finally bought the setnet operation from my parents outright. You may be wondering why a setnetter who has no ability to fish the Igvak area is even commenting on this proposal. This is because we are drastically affected by the mobile seine fleet. If they are limited in where they can fish, we find our central section of the Northwest Kodiak district becoming more and more crowded with fewer opportunities for all to harvest in the traditional manner. So it behooves me to pay attention and understand what's going on. Again, when reading this proposal, it becomes apparent that claims are made with zero evidence to back them up. In particular, they state that assumptions have become obsolete, but that is not true. When Chignik runs are strong the Cape Igvak fishery takes actually less than the 15% of Chignik bound sockeye originally assumed, and when the runs are weak, there is NO Cape Igvak fishery. It seems that this proposal is just another attempt to eliminate the Cape Igvak fishery but without any facts to back it up. We feel very badly for our Chignik neighbors who have had such complete disastrous seasons, but it must be understood Cape Igvak never even opens at all in the bad years, so Kodiak fishermen can't be blamed for taking all their fish. As a lifelong fisherman with a previous generation of history in my consciousness, I have to add that climate change and the warming of the oceans and ocean acidification is something we are coming up against. Changes are happening and I feel like they are going to keep happening. For this reason I urge you to be very cautious and careful about changing management plans in response to fisheries "disasters." Who knows what disasters will happen next and if you build management plans in response to these rather than based on deep analysis of science and the history and all other elements of the proposal, you'll be setting dangerous precedents for your future decisions. Thank you for your consideration, Adelia Myrick



December 24, 2019

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

Re: Opposition to Proposal 61

Dear Chairman Morisky and Board of Fisheries Members,

I am Alex Roth, Kodiak and Lower Cook Inlet salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife and I reside in Homer, but fish in Kodiak. I own and operate the F/V Wandering Star. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before *any fishing at Igvak occurs*. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak.

The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits.

I ask that the Board reject proposal 61 and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,
Alex and Jaime Roth
F/V Wandering Star
Homer, Alaska



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

Bo Calhoun 57177 Zulu Ct. Homer, AK 99603 12/26/19 RE: Opposition to Proposal #61 Dear Chairman Morisky and Board of Fish members: I'm a third generation Kodiak salmon seiner. I was born in Homer, raised in Port Lions and Homer, and continue to live in Homer. My wife and I hope to raise our two sons on our family seine boat in a healthy Kodiak salmon fishery. I respectfully request you reject Proposal #61. The Cape Igvak Management Plan has been working as intended. The Cape Igvak fishery has not hurt the Chignik sockeye run due to the safeguards already in place. In four of the last six seasons, the early Cape Igvak fishery has remained closed and the current triggers allowing a Cape Igvak opener are sufficient. Also, the Cape Igvak fishery has on average caught less than the traditional allocation, showing that the fishery is managed conservatively. Please reject Proposal #61. Thank you for taking the time to read public comments. Sincerely, Bo Calhoun



Brad Marden
PO Box 2856
Homer, AK 99603

December 23, 2019

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

RE: opposition to Proposal 61

Dear Chairman Morisky and Board of Fish members:

I first participated in the Kodiak seine fishery for salmon in 2004. Since then, I've worked as a deckhand in various salmon, halibut, and herring fisheries throughout the state, before buying my own boat in 2012, followed by a Kodiak seine permit in 2013. Since then I have exclusively fished in Kodiak waters. I respectfully request the Board **reject Proposal 61**.

Proposals to reduce the Cape Igvak allocation are a perennial request at the Kodiak and Chignik finfish meetings, and have been consistently rejected by the board in the past, for good reason. The allocation of 15% of overall Chignik bound fish is based on a historical use of the regional salmon resource from before limited entry. Kodiak fishermen have consistently harvested less than the 15% allocation. Repeating the same requests year after year to change allocation does not make a compelling case to warrant a change. When Chignik salmon escapement is weak, Kodiak fishermen do not get any fishing opportunity at Cape Igvak- this is fair; it also seems fair that in years of Chignik salmon abundance Kodiak fishermen should get a chance to catch the historical allocation. The Cape Igvak fishery helps spread out our fleet and can be an important part of having a decent fishing season for Kodiak fishermen.

I am sure that the Board tires of endless testimony claiming that the fish of concern are "our fish being stolen by those guys over there". It seems that in my 15 years of commercial fishing in Alaskan waters, Kodiak salmon fishermen are often on the defensive. Rather than retaliate with countering proposals of our own, I ask that we maintain status quo and keep historical allocations and fishing opportunity at Cape Igvak. For this reason, I ask that you **reject Proposal 61**. I want to thank you for your service and I hope the Board continues to apply consistency in upholding Mixed Stock Fisheries Policy, and the Sustainable Fisheries Policy.

Sincerely,

Brad Marden



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

My name is Brian Mcwethy. I was born and raised in Kodiak. I live in Kodiak with my family and we all depend on my income. I fished with my father on his seiner growing up and now I own and operate a seiner. Salmon seining and Tanner crab fishing in Kodiak are currently our only sources of income. I plan to try and continue to fish the Kodiak waters and possible my children will have the opportunity to. I hope the current and historical areas we fish aren't taken from us and the future generations of Kodiak. I strongly oppose proposal 60. This would take away a lot of potential for my business possible make the difference in me being able to provide for my family.



December 22, 2019

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

Re: Opposition to Proposal 61

Dear Chairman Morisky and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak, Alaska. I grew up fishing on my dad's boat and got my first crew job working for someone else two weeks after I graduated high school. I haven't missed a salmon season since. I bought into the fishing industry in 2011 with the purchase of a 25-foot jig boat that I worked for two years in the winter and spring months while I still crewed for salmon in the summer. Access to the jig fisheries focusing on cod and rockfish was the only way that I could afford to move into the salmon fleet with a 38-footer in 2013. After the recent cod collapse, I now primarily rely on salmon seining and live here year-round with my wife.

This proposal is simply a grab for fish. This proposal puts forth an arbitrary benchmark of changes to minimum catch for Chignik fishermen seeking reallocation away from Kodiak to Chignik fishermen without justification. The proposer asks that harvest triggers be increased to a level where a fishery in the Cape Igvak section is unlikely to occur. The Cape Igvak management plan is one of the longest standing management plans and one of only two management plans with concrete safeguards for escapements and to ensure the Chignik fisherman get to fish first. The argument that Kodiak fisherman place a negative burden on Chignik runs and the Chignik fishery is false. Run failures in Chignik are in no way the fault of Kodiak fisherman because of the safeguards built into the Cape Igvak Management plan.

Chignik fishermen also argue that Cape Igvak is not an important fishery for Kodiak and that we don't need it anymore. This is also not true. On years of relative abundance of Chignik bound sockeye with a high harvest rates in the Chignik area, Kodiak fishermen are allowed access to their historical Cape Igvak fishery, where up to 25% of total KMA sockeye harvest occurs. On particularly poor years in Kodiak, such as 2016, the Cape Igvak fishery provides a critical lifeline for Kodiak fishermen who have recently endured historically poor local pink and chum runs during even years.

Taking away any fishing opportunity from Kodiak fishermen, particularly from the small boat fleet, would have a direct negative impact on new entrants trying to gain a foothold in this industry, fishing families trying to get by, and fishing support businesses in our region. I'm proud to call Kodiak home and am working to protect our fishing way of life.

Sincerely,
Chris Johnson
F/V North Star



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

if the threshold is doubled, or near doubled, Kodiak fishermen will rarely ever have an opportunity to fish the surplus historically provided in the Cape Igvak section. This proposal would essentially cut Kodiak out of our historic fishing ground and damage the community by reducing our harvest opportunity.



December 22, 2019

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

Re: Opposition to Proposal 61

Dear Chairman Morisky and Board of Fisheries Members,

My name is Danielle Ringer and I appreciate the opportunity to comment on proposals before the Board at the Kodiak finfish meeting. I live in Kodiak with my husband and we own and operate the 38-foot F/V North Star. We chiefly rely on salmon seining and cod and rockfish jigging to maintain our fishing way of life and ability to live on Kodiak Island. I hold a Master's degree from the University of Alaska Fairbanks in Political Ecology of Fisheries and was one of the researchers on the Graying of the Fleet study in the Kodiak region.

This proposal is simply a grab for fish. This proposal puts forth an arbitrary benchmark of changes to minimum catch for Chignik fishermen seeking reallocation away from Kodiak to Chignik fishermen without justification. The proposer asks that harvest triggers be increased to a level where a fishery in the Cape Igvak section is unlikely to occur. The Cape Igvak management plan is one of the longest standing management plans and one of only two management plans with concrete safeguards for escapements and to ensure the Chignik fisherman get to fish first. The argument that Kodiak fisherman place a negative burden on Chignik runs and the Chignik fishery is false. Run failures in Chignik are in no way the fault of Kodiak fisherman because of the safeguards built into the Cape Igvak Management plan.

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Rural villages in the Kodiak Archipelago are struggling and protecting our region's traditional and historic salmon fishery is of utmost importance to prevent further negative impacts on these communities. Small boat harbors are emptying. Communities are depopulating and facing social problems. Schools are closing. For the Alutiiq peoples whose culture and economy has been built around fishing for 7,500 years this recent fisheries dispossession is especially egregious. Within one generation, there's been a:

- 75% decrease in families fishing
- 70% decrease in individual halibut IFQ holdings
- 100% decrease in individual sablefish IFQ holdings



- 85% decrease in the number of young people owning state fishing permits
- 70% decrease in the number of state fishing permits overall

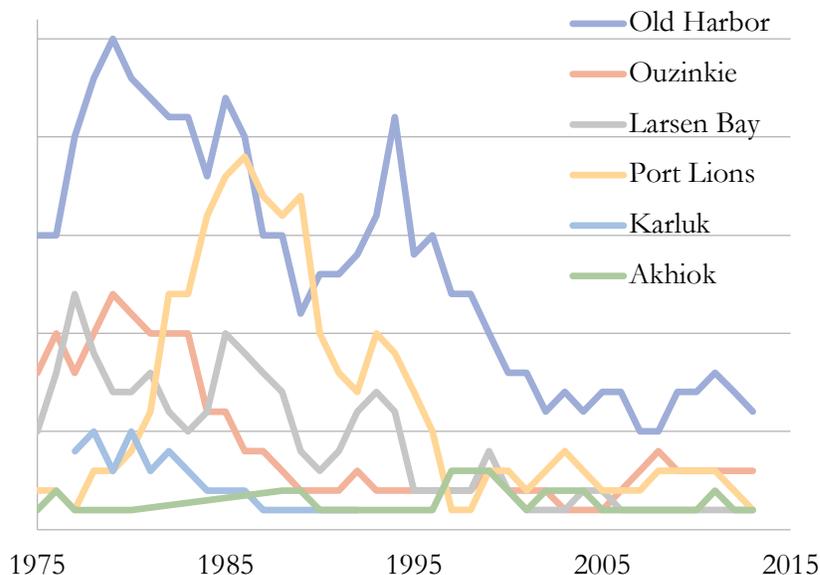


Fig. 1 Alaska limited entry permit holders under age 40 in Kodiak Archipelago communities, 1975-2013. Data: CFEC.

Please do not accept proposals from Chignik seeking to hack away at Kodiak's salmon fishery and way of life. I see no biological, scientific, historical, economic, nor sociocultural reasons that could justify the Board making any changes to the Cape Igvak management plan and thus create ripple effects negatively impacting Kodiak fishermen, processing workers, and community businesses. Thank you for your consideration of my comments and I look forward Board of Fisheries members spending time in our fishing community during the Kodiak meeting.

I humbly request the Board to reject this proposal.

Respectfully,
Danielle Ringer, M.A.
F/V North Star



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

This is a preposterous proposal, intending to cut Kodiak out of its traditional catches in the Cape Igvak Area. The Cape Igvak Management Plan is working just fine. The catches at Chignik are at low cycle, due to causes that are poorly understood, but are not as a result of the Cape Igvak allocation. While I am sympathetic to the pain of the low sockeye returns to Chignik, this does nothing to bring those fish back. This is just an attempted fish grab.



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

The mangement plan has worked fine since 1978. During years of high production Kodiak fisherman get openings. During years of low production there is few or no opening.



Fred Stager

F/V Lady Lu

December 12, 2019

Alaska Board of Fisheries Board Support Section

P.O. Box 115526 Juneau, AK 99811-5526

RE: Opposition to Proposal 61

Dear Chairman Morisky and Board of Fish Members,

This proposal is a fish grab plain and simple. It sets harvest triggers so high for a Cape Igvak fishery as to make it unavailable in most years.

Run failures in Chignik are not the result of the Kodiak fleet harvesting 13% of the run. This traditional harvest doesn't even occur until safeguards ensuring adequate escapement and a modest Chignik harvest are met.

The Cape Igvak Management plan has proven itself as a successful management strategy. **Please vote no on Proposal 61.**

Thank You- Fred Stager



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

Dear Chairman and Members of the Board, As a young fisherman who is working their way into the Kodiak Salmon fishery this proposal will cause Kodiak fishermen to lose a substantial amount of their catch. I have been investing into the Kodiak salmon fishery as much as possible, in 2019 I purchased a Kodiak salmon permit. I ran a seiner for the month of August. I plan on running the same boat for the entire 2020 salmon season in Kodiak. When I was younger I remember testifying against proposals similar to these. These proposals are re-allocations of Kodiak historical catch. Kodiak has always had intercept fisheries and we already have management plans in place that have been effective for the Kodiak salmon fishery. Please help ensure the future for young fishermen entering into the Kodiak Salmon fishery, and the people who have been investing and are established in the fishery. Thank you for considering these comments, Garrett Kavanaugh



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

Dear Chairman Morisky and Board of Fish members: I am 31 years old and a life long resident of Kodiak. I grew up set netting in Uganik on the west side of the island with my mother until i was 14. I then started seining with my father until I was able to buy my own Kodiak seine operational the age of 27. Please oppose proposal 61, if it where adopted the Igvak section would almost never open except for the absolute strongest chignik sockeye runs. thank you for your time sincerely Iver Holm



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

I have been intimately involved in the Kodiak seine fishery since 1968 to present. Presently my son is fishing the Kodiak area and it is my desire to have my grandsons be able to participate in a healthy Kodiak fishery if they so desire. Throughout my career I have come to the conclusion that the ADF&G management for Kodiak has been stellar and has kept the stocks in Kodiak healthy overall with the current management plan. The current management plan disallows fishing time in the Cape Igvak section when chignik runs are weak, but still allows kodiak fishers access to their traditional fishery when runs are more robust. C. Igvak early run has been closed 4 out the last 6 years. Alaska boats and permits asking value is \$40,000 for Kodiak permit and Chignik permits are \$100,000. I believe Kodiak fishers deserve access to their traditional fishery under the present management plan. I oppose proposal 58.



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

My name is Jamin Hall, my wife and I have a set net site in Uganik Bay. I am writing in opposition to proposal 61.



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

Any change to a management plan should be based on scientific reason. Outcry from one user group to take from another is simply a knee-jerk reaction with a sense of immediate gratification but not necessarily improved results. The recent run failures in the Chignik area may be related to normal cycles, climate change, past overfishing, poor spawning conditions, poor brood stock survival conditions, or other as of yet unknown reasons. Cape Igvak is a traditional fishery for Kodiak Fisherman, Thorvold Olsen, Billie Berestoff, Alfred Torsen, Marius Olsen, and Antril Suydam, to name a few, dating back to the 1960's, when boats were constructed of wood and were much smaller than the 58" limit seiners of today; and prior to the Cape Igvak Management plan. The Cape Igvak Management plan is one of the longest standing management plans and one of only 2 management plans with concrete safeguards for escapements and to ensure the Chignik fisherman get to fish first on. This is in no way any fault of the Kodiak Fishermen!



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

December 27, 2019

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

RE: CAPE IGVAK MANAGEMENT PLAN
Chignik Proposals 58, 59, 60, 61, 62

Dear Chairman Morisky and Board Members:

The Kodiak Salmon Work Group (KSWG) is an ad hoc committee created to address the issues of Cook Inlet bound sockeye captured in the Kodiak Management Area and the continuation of the Cape Igvak Management Plan. Membership is open and encompasses seiners from both Kodiak seine organizations, setnetters from both Kodiak setnet organizations, beach seine permit holders and processors. In other words, all of Kodiak's salmon fishing community. The group is supported by voluntary stakeholder contributions including those from the City of Kodiak and the Kodiak Island Borough.

KSWG is herewith submitting several documents for the Board's review: 1. Structure and Function of the Kodiak Management Area Salmon Fisheries; 2. Review of Cape Igvak Salmon Management Plan and Proposals to the Alaska Board of Fisheries; and 3. Economic Analysis of Proposals 58, 60,61 and 64. An informational map is attached as well.

Cape Igvak Management Plan (Proposals 58-62)

Chignik's four substantive proposals regarding the Cape Igvak management plan don't outright request that the Board set aside the plan. Instead they focus on provisional changes that would



gut Kodiak's Cape Igvak fishery. Proposal 58 with the date change would reduce, on average, Kodiak's fishery by 79%. Proposal 59 is an accounting change that would reduce the Cape Igvak fishery by about 20%. Proposal 60, like proposal 58, would reduce Kodiak's revenues by about 67% and proposal 61 comes in with a 69% reduction. The fifth proposal (Proposal 62) is a record-keeping proposal that is untenable.

The Cape Igvak Management Plan is embedded in the Mixed Stock Fisheries Policy: "Most mixed stock fisheries are long standing and have been scrutinized many times by past Boards. Consequently, existing regulatory management plans are understood to incorporate conservation burden and allocation" (Allocation Criterion 2). Chignik's guaranteed catch allocation of 300,000 fish (early run) and 300,000 (late run) was a clear balancing in the original plan, favoring Chignik by providing an economic safety net. In addition, Kodiak would share the conservation burden in that the escapement would be assured before Kodiak would go fishing. On the other hand, if Chignik gets its escapement and minimum guaranteed catch, then Kodiak is allowed to harvest up to approximately what was historically caught in the fishery. This is a fairly balanced plan, if not already overbalanced to Chignik's advantage!

Also, the Board states in Allocation Criterion 3, "The policy should recognize that salmon resources are generally fully utilized and that stability is an important aspect of the fisheries." Why is stability important? Many salmon stakeholders make investments and commitments based on regulatory stability. If salmon management plans are subject to change with every Board cycle, fishery values (ex-vessel, permit and gear) will decrease as uncertainty increases, conservation may be compromised, and stakeholders will be encouraged to try to "get a better deal" at each successive Board meeting.

The history of the Cape Igvak Management Plan (Allocation Criterion 1) is of critical importance to understanding why it was developed and how it was balanced between stakeholders. Prior to the plan Kodiak could fish at Cape Igvak any day that the Chignik fleet fished. The "day for day" fishing caused area managers concern that Kodiak's fishing could impact a weaker "second run" to Chignik. Consequently, the catalyst for the Cape Igvak Management Plan was conservation of Chignik's runs. The plan balanced the conservation burden between the two



areas. The plan has been in place for 42 years and has had constant review over multiple Board cycles. Its durability establishes it as one of the marquee fishery management plans in the State of Alaska. Changing a plan of such long duration without significant “new information” or “new fishing patterns” or “stock of concern” assessments or anything other than a proposer’s feeling that something should be changed, compromises and undermines the Board’s standing as a fair and impartial deliberative body.

The functionality of the Cape Igvak Management Plan as a conservation plan is seen in the plan’s application over the past five years. Because of low Chignik escapements there was no Cape Igvak fishery during 3 seasons. Period! Kodiak cannot be held responsible for any of the current biological or economic issues in Chignik due to low Chignik sockeye returns. Kodiak did not fish at Cape Igvak.

The proposer’s assertion, under Allocation Criterion 4, that Kodiak’s salmon fishermen have more “alternative resources” is a false assertion. If this means that Kodiak has more salmon numerically or by species, then the Board must also recognize that Kodiak’s salmon are divided between approximately 180 active seine fishermen and approximately 150 setnet fishermen ---in contrast to about 75 active Chignik permits. Resource availability is reflected in individual gross earnings. Chignik permits, on average over time, continue to earn more than Kodiak fishermen and, consequently, their permits are worth more in the market. “Alternative resources” in this sense would mean that Kodiak had less “alternative resources” per active permit holder than Chignik.

If the “alternative resources” idea means that Kodiak has more “species” available than Chignik salmon fishermen, this too is false. Both Kodiak and Chignik fishermen have access to halibut and cod in their areas although the Federal cod season is now closed in both areas. Only two or three Kodiak salmon fishermen are involved in the Gulf of Alaska trawl fisheries --- a fishery that limits participation with high costs of entry. Both Chignik and Kodiak have historically had a Tanner crab season. While Kodiak currently has a very small Tanner crab quota, only a subset of the Kodiak salmon fleet (like the Chignik fleet) have limited entry permits for the Tanner crab fishery. The Kodiak herring fishery is essentially gone. Kodiak fishermen, especially those from



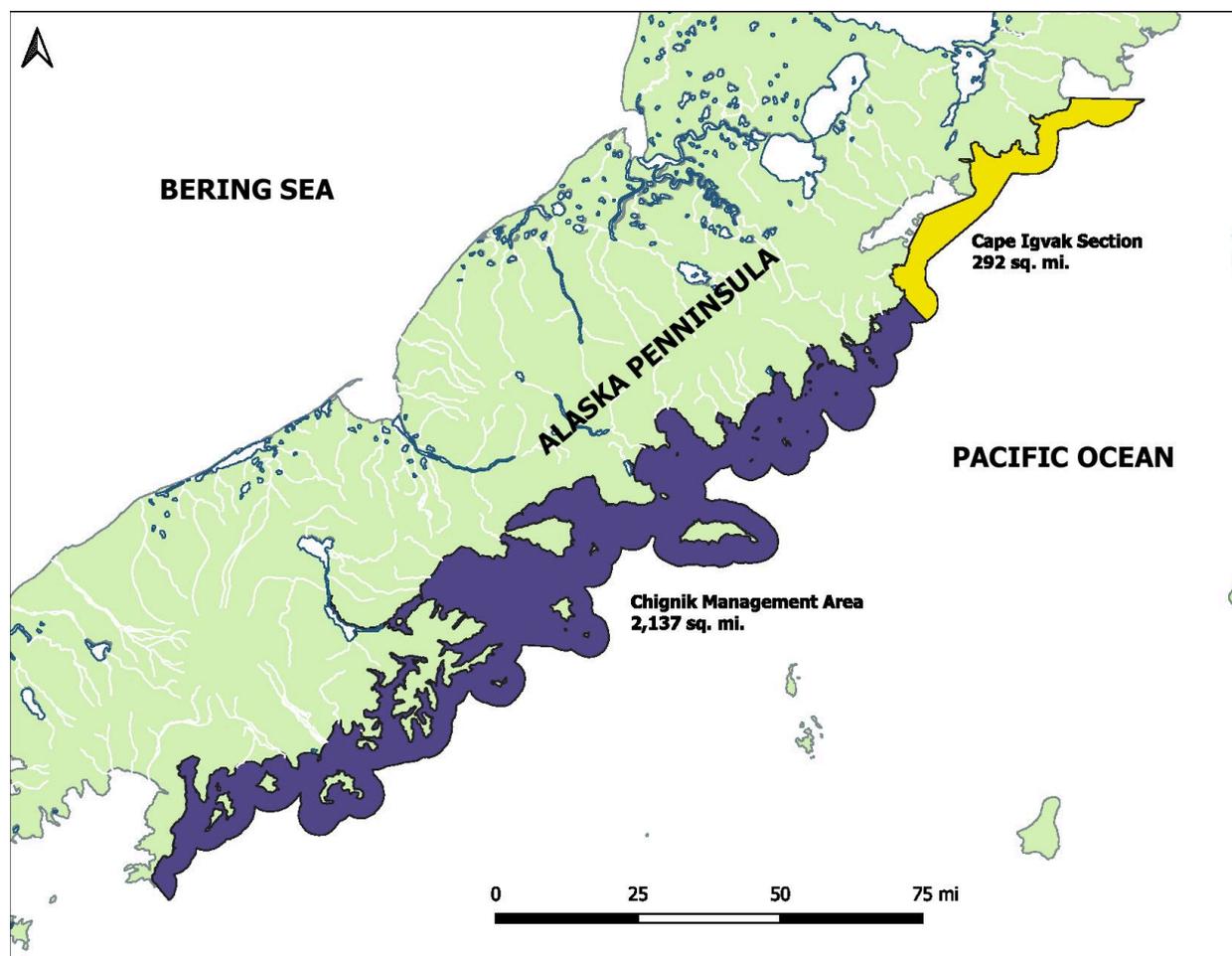
Old Harbor, Akhiok, Ouzinkie, Port Lions and Larsen Bay just don't see what "alternative resources" are available in Kodiak that Chignik doesn't have. All rural communities in the Gulf of Alaska under about 1,500 people are struggling to survive on their fisheries economy--- which is now almost exclusively salmon.

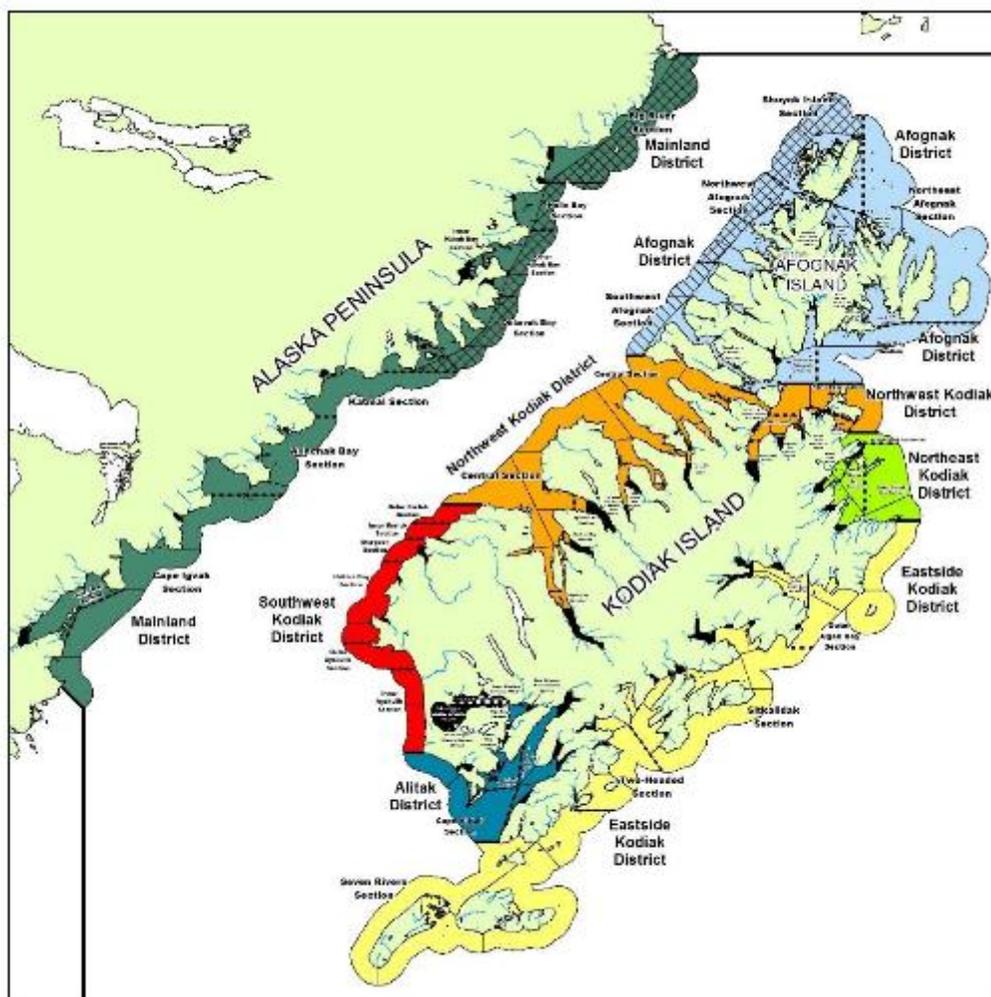
Finally, "The importance of the fishery to the economy of the region and the local area" (Allocation Criterion 7) favors Kodiak. The loss of the Cape Igvak fishery would cost Kodiak fishermen, on average, almost 4 million dollars. At best, the Igvak fishery would increase earnings by a subset of fishermen that actually live in Chignik or the Chignik region by less than an average of 12.0%. While not insignificant, the Igvak fishery is of reduced "importance to the economy of the Chignik region" when compared with the decline of active vessels and the number of Chignik fishermen that are now fishing in Kodiak and Prince William Sound. See further: Review of the Cape Igvak Management Plan and Proposals to the Alaska Board of Fisheries, Proposal 58 Economic Analysis, Proposal 60 Economic Analysis and Proposal 61 Economic Analysis.

In summary, it is the position of the Kodiak Salmon Work Group that the Board should vote NO on proposals 58, 59, 60, 61, 62 and 63. These proposals are not supported by the Board's allocation criteria and do not have a rational relationship to Chignik's conservation needs.

Very truly yours,

Duncan Fields, Chairman





Review of Cape Igvak Salmon Management Plan and Proposals to the Alaska Board of Fisheries

Kodiak Salmon Working Group



Executive Summary

- The Cape Igvak Salmon Management Plan (CISMP) has been in place since 1978 and allocates 15% of total Chignik sockeye harvest to Cape Igvak (Kodiak Management Area) after Chignik is guaranteed 600,000 harvest from early and late runs combined, and escapement goals are projected to be met.
- Management strategies under CISMP have been very successful in meeting the sockeye allocation objective and providing escapements within goals.
- Recent genetics studies are robust, but limited sampling with highly variable results does not in itself justify changes to the management plan.
- Genetic results show that the current regulatory assumption that 90% of Igvak sockeye harvests are Chignik bound fish is overly conservative; all samples showed substantially lower contributions of Chignik-bound sockeye to the Igvak harvests.
- Board of Fisheries proposals to alter metrics guiding the Cape Igvak Salmon Management Plan are not well supported by available data.
- The long-standing Cape Igvak plan appears to be working well in terms of limiting harvest of Chignik origin sockeye through harvest guarantees to Chignik, and meeting escapement goals for early and late runs of Chignik sockeye.



Cape Igvak Salmon Management Plan

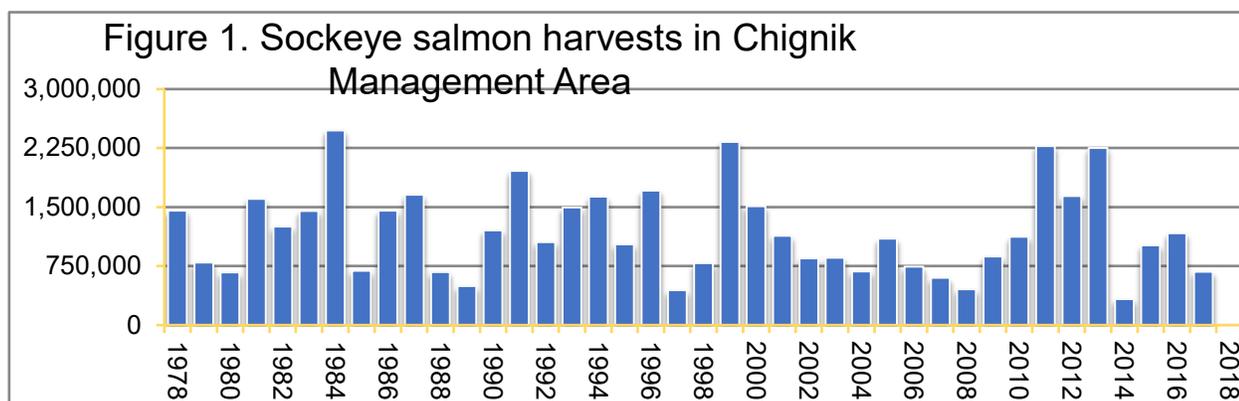
A purse seine fishery has been active along capes in the Cape Igvak section of Kodiak Management Area (KMA) since 1964. Following a tagging study in 1969 (ADFG, unpub. data) where 84% of released tags were recovered in Chignik Area fisheries, periodic modifications to the fishery were directed by the Alaska Board of Fisheries. In 1978, the Cape Igvak Salmon Management Plan (CISMP) was adopted to restrict harvest of Chignik bound sockeye at Cape Igvak. The fishery is one of two in the state (the other is the Southeast District Mainland, Area M) in which harvest and escapement triggers from an adjacent management area (both Area L-Chignik) must be met before the fishery can open. From beginning of the fishing season to July 25, Chignik fishermen must harvest a minimum of 600,000 sockeye salmon (300,000 from both early and late Chignik runs) and adequate escapements for both runs must be projected to occur before harvest will be allowed in Igvak. KMA fishermen at Cape Igvak are allocated 15% of the total Chignik harvest. The Board stipulates that 90% of the harvest at Igvak and 80% of the harvest in Southeast District Mainland (Area M) are Chignik bound fish (Anderson et al., 2019, Wilburn, 2019). Proposals to the Board for the 2020 Kodiak Management Area focus on specific metrics in the plan.

Since the CISMP plan came about, management has been very effective at meeting the allocation objectives in the plan. Only four times in forty years has the 15% target been exceeded by more than 1% (Anderson et al., 2019), which is probably within reasonable expectations for management error. Harvests of Chignik bound fish at Igvak obviously go up and down with Chignik harvests and the Igvak fishery has been closed, or catches extremely low, three times between 2014 and 2018 due to poor



runs and lower harvests in Chignik. On the other hand, Igvak sockeye harvests were much more robust in 2011 and 2013 when Chignik sockeye harvests exceeded 2 million sockeye (Anderson et al., 2019). While Chignik sockeye harvest was essentially zero for 2018, the forty year history shows wide fluctuations, with two of the lowest and two of the highest harvests occurring in the past ten years (Figure 1). Average Chignik sockeye harvests between 1998 and 2018 were about 15% lower than harvests in the previous two decades, 1978-1997. However, three of four harvests over 2 million fish were also in the most recent two decades (Figure 1).

The management plan has also been effective from a conservation and sustainability standpoint. Early and Late sockeye runs to Chignik River have met or exceeded their respective escapement goals every year since 1980, until the run failure in 2018, when the early Chignik sockeye run



failed to meet the escapement goal (Munro, 2019).

Recent Genetics Studies in Igvak Section

In the recent fishery genetic stock identification study in KMA, Shedd et al. (2016) added two sampling strata (early and middle) for Cape Igvak Section in each of the three study years, 2014-2016. No Igvak samples



were taken in 2014 because low Chignik harvest numbers kept the area closed to commercial harvest. In 2015, only the July stratum (middle) was sampled as Igvak was again closed in June due to inadequate sockeye harvests in Chignik Management Area. Harvest of Chignik fish in Igvak was estimated as 2,059 fish (total harvest 6,595) in the middle stratum, 2015. In both 2014 and 2015, the management plan had its intended effect of keeping Igvak closed or limited when Chignik harvests were low. In 2016, with a stronger Chignik run, an estimated 114,412 Chignik sockeye were harvested in the early (June) stratum. An estimated 10,006 Chignik bound sockeye were harvested at Igvak in July (Shedd et al., 2016).

While it is clear that Chignik fish were captured at Igvak in both years, with only three temporal strata sampled over a three year period, including a single datum for early strata harvests, specific conclusions about patterns of presence, magnitude or vulnerability of Chignik bound fish in Igvak fisheries are unwarranted. The single early (June) stratum sampled from the three year period estimated harvest of Chignik bound sockeye an order of magnitude larger than the two middle stratum harvests from 2015 and 2016. These data emphasize wide variation for Chignik bound sockeye harvests at Cape Igvak, and do not support substantive changes to the current management plan.

Data in Shedd et al. (2016) also does not support the presumption in the management plan that 90% of sockeye salmon harvests in Igvak are Chignik bound fish. The single middle stratum (July) estimate from 2015 found 31.2% Chignik sockeye from a total harvest of 6,595. The middle stratum estimate from 2016 was much lower, where only 5.6% of the sampled harvest were Chignik fish (total harvest 177,315). The sole early stratum (June) contribution in 2016 was much higher, estimating 74.1% of



Igvak harvests were Chignik origin (total harvest 154,318), but still did not reach 90%. The assumption that 90% of Igvak harvests are comprised of Chignik bound fish is very uncertain. Other genetic studies suggest uncertainty for similar assumptions in Southeast District Mainland (SEDM, Area M) fisheries, where Chignik bound sockeye are thought to represent 80% of sockeye harvested. Dann et al., (2012), showed that the overall proportion of Chignik bound fish harvested in SEDM was very consistent in 2010, 2011, and 2012 at 65%, 67% and 66% respectively, excluding the Northwest Stepovak Section in July.

Board of Fisheries Proposals

There are five proposals before the board which address the Cape Igvak fishery. Four of these seek to more severely curtail the fishery through specific alterations to metrics of the management plan. They propose completely eliminating fishing at Igvak prior to July 8 (proposal 58), lowering the board approved allocation of Chignik bound fish to KMA fishermen at Igvak from 15% to 5% (proposal 60), or dramatically raising Chignik harvest thresholds upon which Igvak fishery openings are predicated (proposal 61). A fourth proposal suggests that accounting practices for total Chignik harvest be changed such that harvests in Southeast District Mainland (Area M) and Igvak are no longer considered part of the Chignik total harvest. None of these proposals provide credible, data-driven justification for changing longstanding management plans. Recent genetic stock identification results reflect very limited sampling at Cape Igvak (Shedd et al. 2016) and as a result, insight regarding harvest patterns of Chignik sockeye in Igvak fisheries is narrow. There is no doubt that stock composition and harvest estimates are accurate and precise, but



only three strata in two different years were analyzed, where estimated harvest numbers of Chignik bound fish at Igvak were an order of magnitude different between them.

- **Proposal 58** would close Cape Igvak to fishing until July 8, based on increases in KMA harvests and declines in Chignik harvests. However, Chignik fish represented a relatively minor component of Westside KMA harvests sampled in Shedd et al. (2016) and there is no data linking historical harvests in KMA to Chignik harvests. Increases in KMA sockeye harvests over the years most-likely resulted from greater harvests of local sockeye stocks and sockeye from enhancement efforts by Kodiak Regional Aquaculture Association, which averaged about 345,000 during 2008 - 2017 (Anderson et al., 2018). Though Chignik suffered a run failure in 2018, long term average harvests during 1998-2018 are only 15% smaller than those from 1978-1997.
- **Proposal 59** seeks to change fishery accounting practices in CISMP by eliminating SEDM and Cape Igvak harvests from the total Chignik sockeye harvest, for allocation purposes within the plan. Currently 80% of sockeye harvested in most areas of SEDM and 90% of sockeye in Igvak are assumed part of total Chignik harvest. The effect of this is that allocation percentages would be reached sooner and harvests at Cape Igvak would be smaller. If the management plan assumes a specific percentage of Chignik origin fish in SEDM or Igvak, it must be included in



allocative accounting. It would be inappropriate to address only Igvak with such a proposal.

- **Proposal 60** would lower the allocation percentage of Chignik sockeye to Cape Igvak fishermen from 15% to 5% supposedly because at the inception of the management plan, KMA sockeye harvests were weak and Chignik harvests were robust, and now the situation is reversed. While KMA sockeye harvests have improved since 1978 due to local stock performance and enhancement efforts, there is no evidence that any declines of CMA sockeye harvests are tied to Cape Igvak sockeye harvests. Chignik harvests show wide variation since 1978 as many salmon systems do. Two of the highest and two of the lowest Chignik area sockeye harvests have occurred during the last decade (Figure 1). This proposal would significantly reduce harvest in Kodiak's longstanding fishery at Cape Igvak without justification.
- **Proposal 61** would raise harvest thresholds for the early and late Chignik run combined from 600,000 to 1,000,000 sockeye before Igvak could open and guarantee a harvest of 1,000,000 sockeye to Chignik fishermen. The proposal would probably close the Igvak fishery. Justification is based on unstated changes in assumptions and economic conditions that have occurred since inception of the management plan. This is essentially the same proposal submitted to the Area M board meeting in 2019 to



severely curtail the SEDM fishery, which the Board of fisheries rejected.

Proposal 62 creates mandatory reporting for vessels entering or leaving Cape Igvak section. It is likely unworkable and ineffective for fisheries managers to perform this monitoring.

Literature Cited

Anderson, T.J., J. Jackson, B. A. Fuerst, and A. E. Dorner. 2019. Kodiak Management Area commercial salmon fishery annual management report, 2018. Alaska Department of Fish and Game, Fishery Management Report No. 19-17, Anchorage.

Dann, T. H., M. J. Witteveen, S. D. Rogers Olive, C. Habicht, M. B. Foster, H. L. Liller, and W. D. Templin. 2012. Genetic stock composition of the commercial harvest of sockeye salmon in Southeastern District Mainland, Alaska Peninsula Management Area, 2010–2012. Alaska Department of Fish and Game, Special Publication No. 12-31, Anchorage.

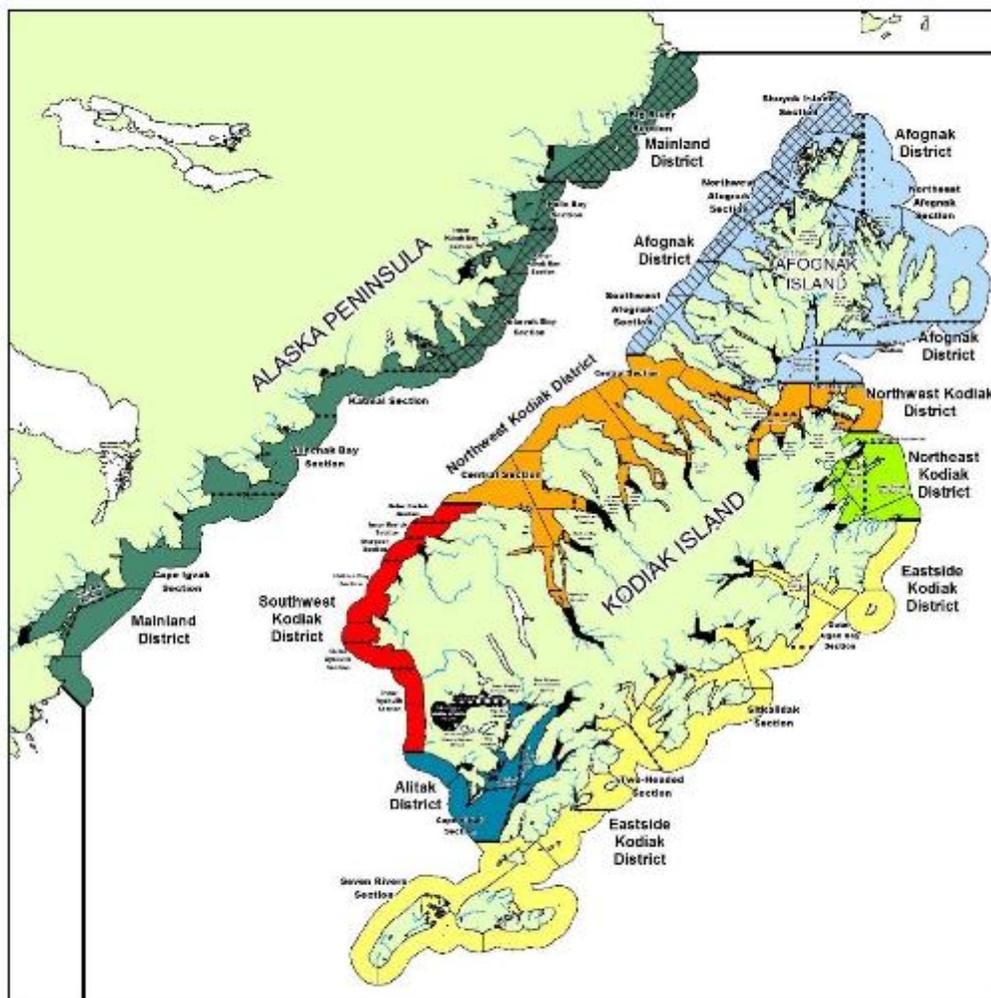
Munro, A. R. 2019. Summary of Pacific salmon escapement goals in Alaska with a review of escapements from 2010 to 2018. Alaska Department of Fish and Game, Fishery Manuscript Series No. 19-05, Anchorage.

Shedd, K. R., M. B. Foster, T. H. Dann, H. A. Hoyt, M. L. Wattum, and C. Habicht. 2016. Genetic stock composition of the commercial harvest of sockeye salmon in Kodiak management area, 2014–2016. Alaska Department of Fish and Game, Fishery Manuscript Series No. 16-10, Anchorage.

Wilburn, D. M. 2019. Chignik Management Area commercial salmon fishery harvest strategy, 2019. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report 4K19-09, Kodiak.



2019-2020 Board of Fish || Kodiak Finfish || Proposal 61



Economic Analysis Proposal 61

Kodiak Salmon Workgroup



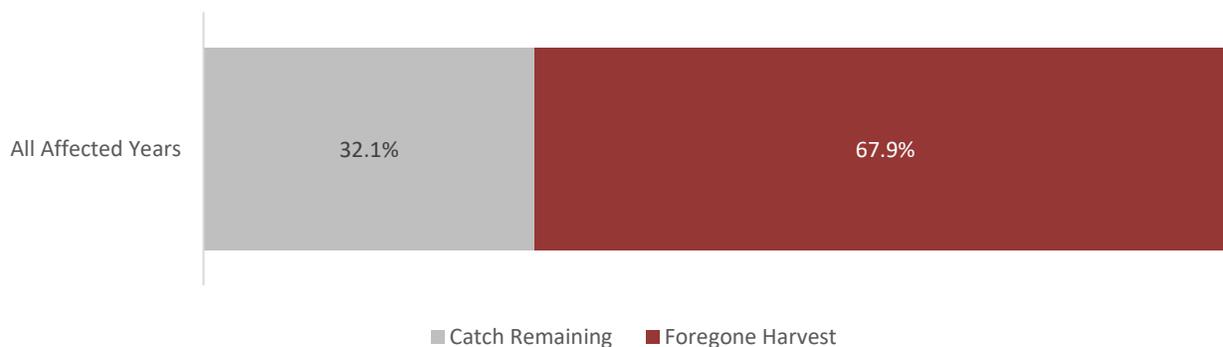
Key Findings

- Overall, changes from Proposal 61 would result in an economic loss in the Kodiak Borough of more than two million dollars a year.
- On average, restrictions during the effected years would result in more than 65% of the current sockeye catch being eliminated.
- The complete implementation of proposal 61 would result in an average foregone harvest worth at least \$1.37 million ex vessel price per year among affected fishermen.
- Direct loss of foregone sockeye harvest per year ranges from \$5,500 to \$2.99 million over the time period examined (1998-2019). The mean foregone sockeye harvest is valued at \$1.13 million per year, using each year's prices.
- Sockeye loss per permit holder affected ranges from \$300 to \$41,000 per year (mean \$17,000), depending on number of affected fishermen and count of foregone sockeye harvest.
- Total foregone harvest among all species is estimated to be 1.45 million pounds per year worth an average of \$1.37 million per year, using each year's prices. Average loss per affected permit holder estimated to be \$26,000 per year.
- Species specific foregone harvest ex vessel price estimated to range between \$0 (coho) to \$2.99 million (sockeye) per year.

**\$1.37 Million Dollars
Yearly Direct Loss to
Fishermen**

**\$2.05 Million Dollars
Annual Economic Loss
in the Kodiak Borough**

Average Revenue Loss Per Year





Methodology and Data Sources

Background

The 2019-2020 Board of Fish, Kodiak Finfish Proposal 61 will amend the Cape Igvak Management Plan to increase the minimum expected sockeye salmon harvest thresholds. The proposal will increase harvestable surplus above escapement goals from 300,000 to 600,000 and from 600,000 to 1,000,000 and change the definition of the Chignik sockeye count. The proposal raises minimum harvest counts required before the opening of the Cape Igvak fishery and imposes further limits if the Chignik harvest is not expected to exceed 1,000,000 sockeye. The proposal redefines the Chignik sockeye count to include only the Chignik Management Area before July 8th. Currently the Chignik area includes all sockeye harvest in the Chignik Management Area, 80% of sockeye harvest in East Stepovak, Southwest Stepovak, Stepovak Flats, Balboa Bay, and Beaver Bay Sections and 90% of sockeye harvest in Cape Igvak.

Proposal 61 is only focused on the Cape Igvak section, Kodiak Mainland District.

Link to Proposal:

<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2019-2020/proposals/58.pdf>

Data Sources

Foregone harvest days count and pound data was provided by the State of Alaska, Department of Fish and Game daily harvest reports. Price data for 1998-2018 was provided from the State of Alaska, Department of Fish and Game *Commercial Operator's Annual Reports* (COAR). 2019 price data was not available through the COAR report at the time of this analysis. 2019 price data is estimated from the five-year average of the reported 2014-2018 price per pound per species (see methods below). Multipliers for indirect and induced economic impact were commissioned from the US Department of Commerce, Bureau of Economic Analysis specifically for the Alaska commercial fishing industry. Inflation rates are provided from the US Department of Labor, Consumer Price Index. Tax information is from the State of Alaska, Department of Revenue and the Kodiak Borough.

Data Methods

Economic impact is estimated using historical harvest data from 1998-2019. Proposal 61 applies to Cape Igvak, which is a purse seine fishery. For the period prior to July 8th, no fishing occurred in Cape Igvak in 1998, 2008-2009, 2014-2015, and 2018-2019.

Proposal 61 would be in effect for 21 of the 22 years affected (all except 2018 with historically low runs).



The value of foregone harvest is calculated as species-specific foregone harvest pounds multiplied by species-specific Kodiak area price per pound for each year. Foregone harvest counts and economic impact are calculated for Cape Igvak as a whole. The number of permit holders affected by proposal 61 is calculated as the maximum number of unique permits during the closure period in harvest records.

Species specific prices per pound for each year between 1998-2018 were obtained from the Fish Game COAR for each individual year. The total net weight in the Kodiak area for each species for each season is divided by the respective net value.

Final 2019 COAR price per species data is not available. Species specific price for 2019 was estimated as a five-year average of available COAR data (2014-2018). Verification of 2019 data with the KSWG provided spreadsheets using Icicle, Ocean Beauty, and Pacific season prices for 2017-2019 compared to COAR for 2017, 2018. The spreadsheet values varied from published COAR by both higher and lower values up to 20%. The five-year average was much closer to 2017 and 2018 prices than the spreadsheet averages and weighted averages for respective years. The sockeye 2019 season price per pound estimate may be biased downwards given the processor spreadsheet; the COAR numbers were up to 20% lower than provided spreadsheet, and the five-year average is 16% lower than 2019 processor spreadsheet.

Indirect and induced economic loss was calculated from Regional Input-Output Modeling System (RIMS II) type I and type II multipliers. These take into account increase (in this case local loss) in regional economic activity due to change in industry specific earnings. For this report, the fisheries industry specific multipliers were used. Selected industry multipliers are specific to Alaska.

All values are adjusted for inflation and shown in 2019 dollar values.



Results & Data Tables

Direct Losses

On average, in the years effected by Proposal 61, more than 65% of the current catch would be restricted. Overall, these changes would result in an economic loss to the Borough of more than two million dollars a year.

Direct revenue lost to the Kodiak Borough per year:

\$1.37 Million Dollars Yearly Direct Loss to Fishermen	Direct loss per affected year:	\$1.37 Million
	Loss from sockeye fishery:	\$1.13 Million
\$2.05 Million Dollars Annual Economic Loss in the Kodiak Borough	Fisheries employment impact:	12.1 jobs per year
	All employment impact:	15.2 jobs per year
	Indirect community loss:	\$284,074
	Induced community loss:	\$400,249
	Total Annual Borough Loss:	\$2,052,696

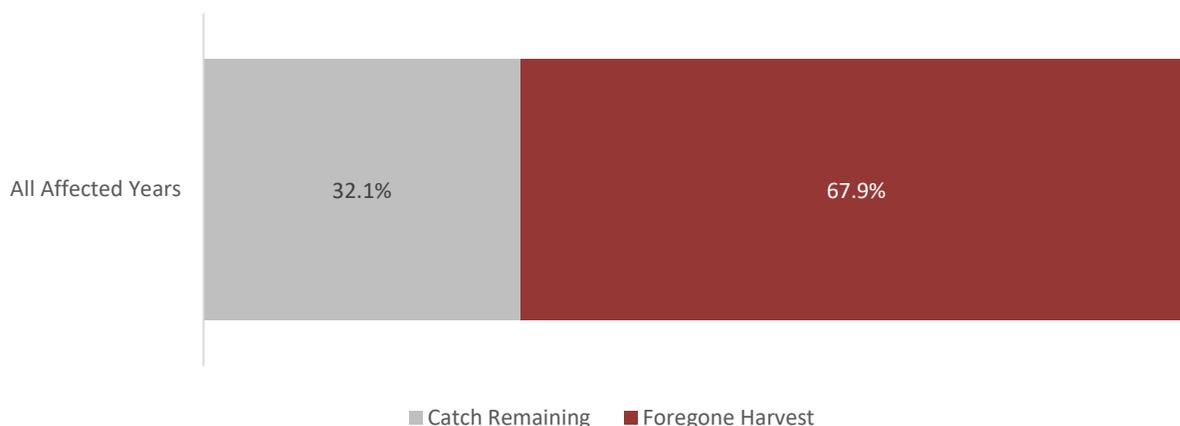
Proposal 61 would have impacts throughout the Kodiak Borough. The direct loss to fishermen would be \$1.37 million per year. Of the total loss to the fishery, the limitation on the sockeye fishery comprise the majority of the impact, accounting for \$1.13 million of the loss with \$240,000 of the total loss distributed among other salmon species.

The direct impact of this proposal will result in a loss of 12.1 fisheries specific jobs and a total of 15.2 jobs overall in the Kodiak Borough per year. In addition to the direct loss impact of \$1.37 million, there is a further indirect loss of \$284k as a result of lost business to business economic activity for the community from purchases such as fuel, gear, and supplies. There is an additional \$400k of induced loss in the community resulting from the lost direct and indirect economic activity (total \$1.65 million) and reduced labor market. This impact results in a total loss to the community from direct, indirect, and induced losses of \$2.05 million per year.



Fisheries Loss

Chart 1: Average Revenue Loss Per Year



On average, restrictions during the effected years would result in more than 65% of the current catch being eliminated. 21 of the 22 years are affected. Proposal 61 would result in a complete closure of the fishery in 2002-2005, 2008, 2014, and 2019. Over the last 22 years 1998-2019, there have been 17 years where the fisheries losses from these increase restrictions would result in a loss of more than 500k dollars of foregone ex vessel value to the fishery. One of the previous 22 years would be unaffected by the proposal changes. Fishing was severely restricted in 2018 due to historically low run returns.

The sockeye fishery would experience ex vessel losses of more than \$500k for 15 of the 21 affected years.

Chart 2: Total Fishery Loss 1998-2019

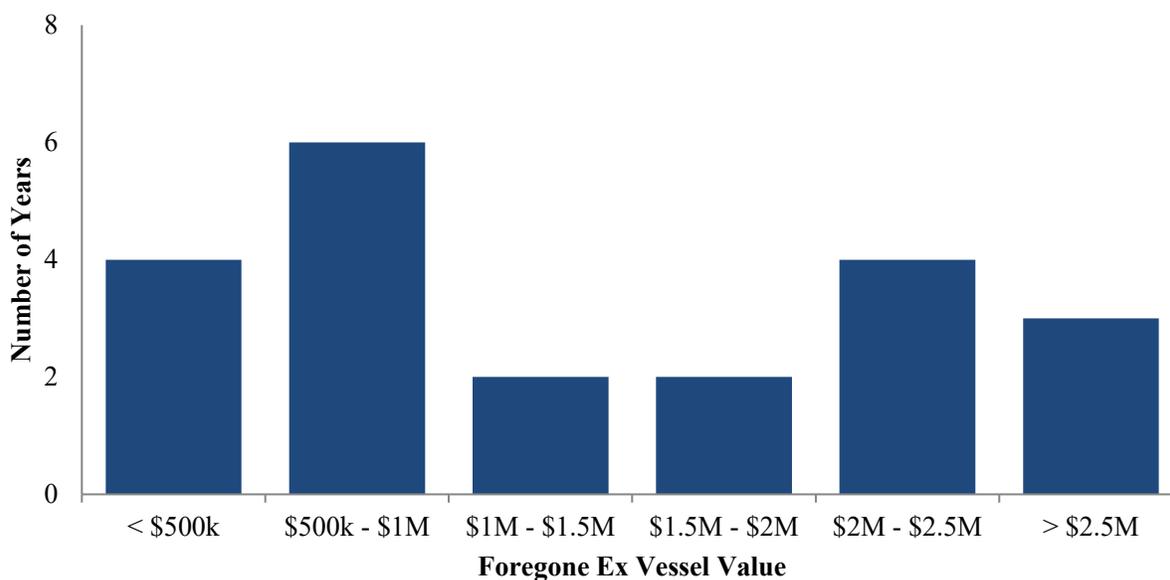
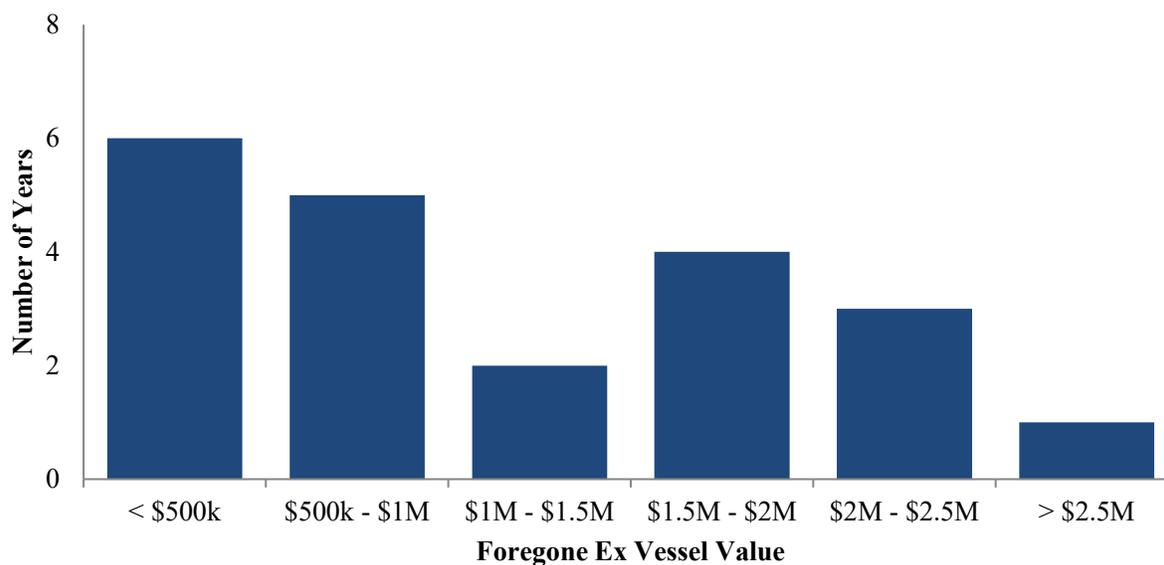




Chart 3: Total Sockeye Loss





The mean direct loss for all species per year is \$1,368,372 with a median loss of \$1,266,541. If these restrictions were in place the greatest impact would have been in 2019 with a loss of \$3,134,923 and the least impact would have been in 1998 with a loss of \$23,056.

Table 1: Direct Loss of Proposal 61 Implementation

Year	Direct Loss All Species	Direct Loss Sockeye
1998	\$23,056	\$17,926
1999	\$1,792,067	\$1,766,438
2000	\$2,360,808	\$2,323,611
2001	\$2,048,165	\$1,640,725
2002	\$851,413	\$799,675
2003	\$719,506	\$639,835
2004	\$898,710	\$869,284
2005	\$2,217,289	\$1,975,671
2006	\$168,071	\$139,644
2007	\$546,640	\$463,954
2008	\$703,717	\$144,405
2009	\$877,409	\$576,270
2010	\$1,709,608	\$1,622,292
2011	\$2,385,643	\$2,306,321
2012	\$2,586,926	\$2,450,203
2013	\$3,034,590	\$2,992,095
2014	\$54,444	\$29,775
2015	\$24,842	\$5,456
2016	\$1,266,541	\$1,159,328
2017	\$1,331,454	\$1,198,552
2018	No Impact	
2019	\$3,134,923	\$559,916
Mean	\$1,368,372	\$1,127,685
Median	\$1,266,541	\$869,284
Min	\$23,056	\$5,456
Max	\$3,134,923	\$2,992,095



Table 2: Direct Loss of Proposal 61 Implementation Per Fishermen

	Average Loss Per Fishermen - All Species	Average Loss Per Fishermen - Sockeye Only
Mean	\$25,711	\$17,326
Median	\$20,104	\$18,051
Min	\$1,553	\$341
Max	\$87,965	\$40,837

Based on the number of active permits per year, individual fishermen would experience a mean direct loss for all species per year of \$25,711 with a median loss of \$20,104. If these restrictions were in place the greatest impact in the sockeye fishery would have been in 2008 with a loss of \$40,837 per fishermen with the least impact in 2015 with an average loss of \$341

Table 3: Loss Per Affected Permit Holder

Year	Permits	Loss per Permit	Total Value Foregone Harvest	2019 Inflation Adjustment
1998	10	\$2,306	\$14,611	\$23,056
1999	126	\$14,223	\$1,160,665	\$1,792,067
2000	126	\$18,737	\$1,580,192	\$2,360,808
2001	81	\$25,286	\$1,409,611	\$2,048,165
2002	69	\$12,339	\$595,394	\$851,413
2003	78	\$9,224	\$514,668	\$719,506
2004	37	\$24,289	\$659,846	\$898,710
2005	71	\$31,229	\$1,683,590	\$2,217,289
2006	46	\$3,654	\$131,717	\$168,071
2007	36	\$15,184	\$440,484	\$546,640
2008	8	\$87,965	\$588,885	\$703,717
2009	28	\$31,336	\$731,784	\$877,409
2010	71	\$24,079	\$1,448,820	\$1,709,608
2011	82	\$29,093	\$2,087,177	\$2,385,643
2012	60	\$43,115	\$2,309,755	\$2,586,926
2013	78	\$38,905	\$2,748,723	\$3,034,590
2014	5	\$10,889	\$50,133	\$54,444
2015	16	\$1,553	\$22,896	\$24,842
2016	63	\$20,104	\$1,181,475	\$1,266,541
2017	83	\$16,042	\$1,269,261	\$1,331,454
2018	No Impact			
2019	39	\$80,383	\$3,134,923	\$3,134,923
Average		\$25,711	\$1,131,648	\$1,368,372



Foregone Tax Revenue

State Taxes

Fisheries Business Tax (50% Share)	\$21,894
SET Tax	\$27,367
Total	\$49,261

Borough

Resource Severance Tax	\$14,710
Fisheries Business Tax (Share of 50%)	\$6,992
Total	\$21,702

Cities

(Share of Fisheries Business Tax)

Akhiok	\$1,631
Kodiak	\$6,516
Larsen Bay	\$1,631
Old Harbor	\$1,751
Ouzinkie	\$1,692
Port Lions	\$1,682
Total	\$14,902



The foregone harvest due to proposal 61 implementation would have tax implications for state, borough, and city budgets. The state implements two relevant taxes in the region: the fisheries business tax (which is shared with local governments) and the salmon enhancement tax (SET). Fisheries business tax rates vary by type of processing activity and the proportion of each is estimated from the State of Alaska’s Annual Tax Report for FY18. The salmon enhancement tax rate is 2% in the Kodiak region. The Borough implements a resource severance tax of 1.075% and receives a share of the fisheries business tax from the state. The local city governments also receive a share of the fisheries business tax from the State of Alaska. Borough and city shares of the fisheries business tax estimated from the Borough’s FY18 annual tax report.

The implementation of proposal 61 would result in average yearly tax losses of \$49,261 to the State of Alaska, \$21,702 to the Kodiak Borough, and \$6,516 to Kodiak City.

Loss by Species

Table 4: Sockeye Foregone Harvest

Year	Foregone Harvest - lbs	Sockeye Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	9,568	\$1.187	\$11,360	\$17,926
1999	1,058,871	\$1.080	\$1,144,066	\$1,766,438
2000	1,739,030	\$0.894	\$1,555,295	\$2,323,611
2001	1,608,942	\$0.702	\$1,129,198	\$1,640,725
2002	909,868	\$0.615	\$559,213	\$799,675
2003	758,691	\$0.603	\$457,679	\$639,835
2004	976,581	\$0.654	\$638,241	\$869,284
2005	1,869,704	\$0.802	\$1,500,130	\$1,975,671
2006	130,411	\$0.839	\$109,438	\$139,644
2007	374,357	\$0.999	\$373,855	\$463,954
2008	101,203	\$1.194	\$120,841	\$144,405
2009	427,536	\$1.124	\$480,626	\$576,270
2010	969,922	\$1.417	\$1,374,824	\$1,622,292
2011	1,322,182	\$1.526	\$2,017,779	\$2,306,321
2012	1,485,596	\$1.473	\$2,187,681	\$2,450,203
2013	1,488,962	\$1.820	\$2,710,231	\$2,992,095
2014	14,985	\$1.830	\$27,417	\$29,775
2015	5,418	\$0.928	\$5,029	\$5,456
2016	847,930	\$1.275	\$1,081,462	\$1,159,328
2017	755,297	\$1.513	\$1,142,567	\$1,198,552
2018	No Impact			
2019	403,843	\$1.386	\$559,916	\$559,916
Total	17,258,897		\$19,186,847	\$23,681,375

**Table 5: Chum Foregone Harvest**

Year	Foregone Harvest - lbs	Chum Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	4,113	\$0.19	\$782	\$1,235
1999	60,327	\$0.19	\$11,197	\$17,287
2000	92,806	\$0.22	\$20,153	\$30,108
2001	626,483	\$0.32	\$199,942	\$290,516
2002	137,679	\$0.16	\$22,253	\$31,822
2003	195,383	\$0.14	\$27,204	\$38,031
2004	125,877	\$0.12	\$15,458	\$21,053
2005	185,393	\$0.20	\$37,447	\$49,318
2006	50,260	\$0.33	\$16,799	\$21,436
2007	110,036	\$0.35	\$38,731	\$48,065
2008	241,433	\$0.50	\$121,290	\$144,942
2009	191,900	\$0.44	\$84,096	\$100,831
2010	109,744	\$0.56	\$61,481	\$72,548
2011	93,537	\$0.69	\$64,547	\$73,777
2012	174,568	\$0.60	\$105,145	\$117,762
2013	114,203	\$0.25	\$29,003	\$32,019
2014	18,324	\$0.53	\$9,697	\$10,530
2015	4,459	\$0.38	\$1,701	\$1,845
2016	195,096	\$0.34	\$65,775	\$70,511
2017	132,879	\$0.57	\$76,223	\$79,958
2018	No Impact			
2019	301,989	\$0.46	\$137,506	\$137,506
Total	3,166,489		\$1,146,429	\$1,391,101

**Table 6: Pink Foregone Harvest**

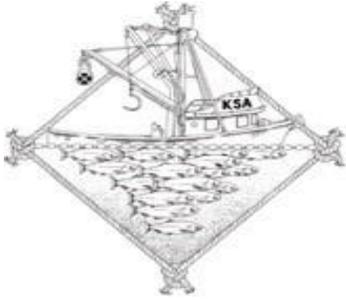
Year	Foregone Harvest - lbs	Pink Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	12,643	\$0.15	\$1,904	\$3,004
1999	1,237	\$0.14	\$174	\$269
2000	19,270	\$0.14	\$2,771	\$4,139
2001	425,322	\$0.12	\$50,482	\$73,350
2002	104,486	\$0.09	\$8,984	\$12,848
2003	239,859	\$0.09	\$21,062	\$29,445
2004	22,668	\$0.10	\$2,174	\$2,961
2005	1,084,704	\$0.12	\$130,269	\$171,564
2006	11,709	\$0.16	\$1,916	\$2,445
2007	87,922	\$0.18	\$15,860	\$19,683
2008	452,280	\$0.37	\$165,499	\$197,772
2009	595,462	\$0.26	\$153,209	\$183,697
2010	19,416	\$0.44	\$8,446	\$9,967
2011	876	\$0.47	\$408	\$466
2012	27,650	\$0.48	\$13,188	\$14,771
2013	10,748	\$0.42	\$4,548	\$5,021
2014	25,227	\$0.33	\$8,360	\$9,079
2015	60,791	\$0.25	\$14,937	\$16,207
2016	55,585	\$0.47	\$26,237	\$28,126
2017	113,573	\$0.43	\$48,638	\$51,021
2018	No Impact			
2019	5,819,486	\$0.37	\$2,149,409	\$2,149,409
Total	9,190,914		\$2,828,476	\$2,985,244

**Table 7: Coho Foregone Harvest**

Year	Foregone Harvest - lbs	Coho Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	1,145	\$0.37	\$423	\$668
1999	0	\$0.41	\$0	\$0
2000	0	\$0.49	\$0	\$0
2001	13,239	\$0.24	\$3,180	\$4,621
2002	10,920	\$0.18	\$1,940	\$2,774
2003	21,827	\$0.20	\$4,362	\$6,098
2004	29	\$0.27	\$8	\$11
2005	341	\$0.42	\$143	\$189
2006	14	\$0.66	\$9	\$12
2007	9,975	\$0.60	\$5,961	\$7,398
2008	149,434	\$1.20	\$179,256	\$214,210
2009	14,037	\$0.61	\$8,548	\$10,249
2010	116	\$0.80	\$92	\$109
2011	0	\$0.82	\$0	\$0
2012	7	\$0.77	\$5	\$6
2013	0	\$0.72	\$0	\$0
2014	6,497	\$0.67	\$4,373	\$4,750
2015	3,190	\$0.38	\$1,227	\$1,331
2016	227	\$0.78	\$178	\$191
2017	52	\$0.84	\$43	\$46
2018	No Impact			
2019	429,343	\$0.67	\$287,313	\$287,313
Total	660,393		\$497,063	\$539,975

**Table 8: Chinook Foregone Harvest**

Year	Foregone Harvest - lbs	Chinook Price	Foregone Harvest Value	2019 Inflation Adjustment
1998	200	\$0.71	\$142	\$224
1999	7,679	\$0.68	\$5,228	\$8,072
2000	2,980	\$0.66	\$1,974	\$2,949
2001	37,257	\$0.72	\$26,809	\$38,953
2002	8,155	\$0.37	\$3,003	\$4,295
2003	12,291	\$0.35	\$4,361	\$6,097
2004	7,700	\$0.51	\$3,965	\$5,400
2005	20,508	\$0.76	\$15,601	\$20,547
2006	3,792	\$0.94	\$3,554	\$4,535
2007	6,818	\$0.89	\$6,076	\$7,540
2008	1,994	\$1.00	\$1,998	\$2,388
2009	7,755	\$0.68	\$5,306	\$6,362
2010	6,169	\$0.64	\$3,977	\$4,692
2011	4,961	\$0.90	\$4,443	\$5,078
2012	6,150	\$0.61	\$3,736	\$4,184
2013	8,589	\$0.58	\$4,941	\$5,455
2014	297	\$0.96	\$286	\$310
2015	4	\$0.68	\$3	\$3
2016	8,635	\$0.91	\$7,823	\$8,386
2017	2,337	\$0.77	\$1,789	\$1,877
2018	No Impact			
2019	940	\$0.83	\$779	\$779
Total	155,210		\$105,793	\$138,127



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

December 12, 2019

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

RE: **Oppose Proposal 61**

Dear Chairman Morisky and Board of Fish Members:

Thank you for the opportunity to comment on Proposal 61 in advance of the Kodiak Finfish meeting. The Kodiak Seiners Association (KSA) respectfully requests you **oppose proposal 61**, which is an allocative proposal lacking merit based on an application of the allocation criteria.

Please see other comments submitted by KSA addressing allocation issues concerning the Cape Igvak area. This proposal would drastically reduce the likelihood of a fishery being prosecuted at Cape Igvak and would allocate salmon resources away from a fishery that is highly dependent on access to this area. Implementation of this plan would impose incalculable harm to the Kodiak fleet and would result in a further loss of vessels from the Kodiak management area. This proposal intends to put Kodiak fishermen out of business in order to guarantee extraordinary seasons to Chignik fishermen before we are allowed access to our historical fishing grounds.

Kodiak's impact on Chignik's fishery has gone unchanged since the implementation of the plan and conservative management has resulted in Kodiak averaging 20% *below* our allocation of Chignik bound stocks. In contrast, Chignik fishermen are currently prosecuting an expanding mixed stock fishery that has negatively impacted the Kodiak area and provided for Chignik fishermen historically high harvests of non-local stocks. Any changes to the distribution of salmon allocation should start with restrictions to the intercept fishery in Chignik where fishermen have had to bear no burden of conservation for non-local stocks and where fishermen, due to the unregulated nature of their mixed stock fishery, have granted to themselves a greater allocation of the shared fishery resources.

KSA requests the **Board reject proposal 61**. We thank you for the opportunity to comment on behalf of the membership of KSA. We appreciate the scientific and factual creation of regulations regarding our fisheries and trust that the Board continue to apply consistency in designing regulation changes while applying the guiding BOF policies, such as the Management for Mixed Stock Salmon Fisheries.

Kodiak Seiners Association represents 157 members, including the majority of actively fishing SO1K seine permit holders, Kodiak and Homer-based businesses, and individual crewmembers. Our focus is advocacy for our membership through positive interactions with ADF&G, the Board of Fisheries, and our State Legislature.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nate Rose'.

Nate Rose
KSA President



December 24, 2019

Matthew Alward

60082 Clarice Way

Homer, AK 99603

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

RE: Opposition to proposal 61

Dear Chairman Morisky and board of fisheries members,

I live in Homer, AK and make my living participating in the Kodiak salmon seine fishery and I oppose proposal 61 which will make multiple changes to the allocative nature of the Cape Igvak management plan. I raised our kids on the back deck of our family seiner with part of that time fishing in the Cape Igvak section which is a longstanding part of the traditional Kodiak fishery.

Proposal 61 seeks to make several changes to the Cape Igvak management plan that has been in place since 1978. First it asks to raise the Chignik harvest trigger that allows an Igvak fishery from an expected 600,000 fish harvest in Chignik by two thirds to a one million fish harvest. Second it asks that if the Chignik harvest is expected to be less than the new trigger of the two thirds higher number of one million fish then the Cape Igvak fishery cannot open until Chignik has harvested 600,000 fish which is double the current number of 300,000 fish. Third change is to the current language which states that "after July 8th after 300,000 fish are harvested in Chignik and Chignik escapement goals are being met the department may manage a fishery as long as Chignik is expected to harvest 600,000 fish". The proposed change would say that now 600,000 fish would have to be harvested before instead of after July 8th and that Chignik would have to be expected to harvest one million fish instead of 600,000 before the department would be allowed to manage an Igvak fishery. Fourth this proposal would change the definition of the Chignik sockeye salmon harvest from current language to exclude two areas of Chignik sockeye harvest from the "Chignik sockeye salmon harvest" that the Cape Igvak allocation is based on which would reduce the traditional Kodiak allocation of Chignik sockeye salmon. Fifth change this proposal looks to make is under the current plan Igvak may not open before the first fishing period of the Chignik area and the proposed change would create a 72 hour delay before Igvak may open. The last change this proposal seeks to make is changing the date that the plan's allocation method will be in



effect from July 25th to July 8th. As I read this language change it would in affect close the Igvak section from July 8th to July 25th removing about half of the potential fishing time under the Cape Igvak management plan.

To raise the Chignik harvest trigger by two thirds to one million fish is nothing more than a way to shift some of the allocation of the management plan from Kodiak to Chignik. Kodiak has not fished in Igvak in four of the last six years which shows me that the conservation measures built into the plan are working. There is no data that warrants a rise of the harvest trigger by two thirds.

In times when a lower than the harvest threshold are expected, to double the harvest trigger necessary to allow an Igvak fishery and to make the new doubled number have to be caught before instead of after July 8th, is yet another way to shift allocation from Kodiak to Chignik. Again the Cape Igvak management plan has been in effect since 1978 and has had numerous proposals made to shift the allocation towards Chignik. Each of the many proposals has had a previous board apply your Allocative Criteria, Mixed Stock Fisheries Policy, and Sustainable Salmon Management Policy and each time the boards have determined that the plan was working well and warranted no changes.

Another allocative change this proposal seeks to make is by redefining how the Chignik sockeye harvest is calculated which is the same change proposal 59 asks to make. This is simply another allocation shift towards Chignik on top of multiple other allocation changes this proposal would make. By removing two areas of Chignik sockeye harvest from the total Chignik sockeye harvest that the 15% allocation is based on would just reduce the Kodiak Chignik sockeye harvest thus allocating fish to Chignik.

Creating a 72 hour window from the first Chignik opener before an opener in Igvak is allowed only serves to reduce potential fishing time in Igvak with no explanation of why this is necessary. While this would not change the allocation measures in the plan, when added upon the other changes this proposal would make it would add to the large allocation shift towards Chignik that this proposal as a whole would make.

And finally to change the date that the Cape Igvak management plan allocation method is in effect from July 25th to July 8th would close the Igvak section from July 8th to July 25th which is about half of the potential fishing time allowed under the plan. This is another large allocation shift from Kodiak to Chignik which combined with all of the other elements in this proposal would make for a huge allocative change.



The reasoning the proposer has for making such a large allocative shift towards Chignik is their claim that many of the assumptions and safeguards made in the plan have been found incorrect and/or have become obsolete. I have not seen or heard of any new evidence that would suggest incorrect or obsolete assumptions that the plan is based on and in my opinion this is just a proposal seeking to change the allocation without giving any reason why a large allocative shift is justified. The fact that Kodiak has not had a fishery in Igvak in four of the last six years I think is strong evidence that the safeguards made in the plan are working well. Chignik has an expanding mixed stock fishery on their outer coast which is known to harvest non Chignik bound stocks and if there is any evidence of changed assumptions from when the plan was put in place it's that Chignik is harvesting Kodiak bound stocks too. Another known change from when the plan was put in place is that the plan assumes that 90% of sockeye harvested in Igvak are Chignik bound and the little bit of data we have from the sockeye genetic study suggests that it is more like 74% of the sockeye harvested in Igvak are Chignik stocks.

In closing I respectfully ask that given the lack of evidence of changed assumptions and safeguards that the Cape Igvak management plan was based on I ask that you keep this long standing allocative management plan in place as written and oppose proposal 61.

Sincerely,

Matthew Alward



Nicholas Hoffman
PO Box 1212
Kodiak, AK 99615

12/24/19

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Oppose Proposal 61

Dear Chairman Morisky and Board of Fish members:

I'm a young Kodiak salmon fisherman. I have been running a seine boat since 2011 as well as participating in Kodiak halibut, sea cucumber, cod jig, and tanner crab fisheries. I respectfully request the Board reject Proposal 61.

This proposal would raise harvest triggers to a level where a fishery in Igvak would be extremely unlikely except in phenomenal Chignik runs. The current plan was put in place to allow Kodiak fishermen access to their historic allocation, not because Kodiak needed additional fish. The current thresholds already insure conservation of Chignik's fishery and allow Chignik fishermen to fish first. This proposal claims that the underlying assumptions in the Cape Igvak Plan have become incorrect with the passage of time, but does not cite any specific issue or false assumption. Nothing has changed to merit the adjustment of the current thresholds. The proposals also accuse Kodiak fishermen of placing a negative burden on the Chignik fishery, which is false. When Chignik has a weak run year, Kodiak already doesn't fish the Igvak section under the current thresholds. Weak runs in Chignik are not the fault of Kodiak fishermen or Cape Igvak Management Plan.

I see no reason for the Board to make any changes to the Kodiak Salmon Management plan. Thank you for the opportunity to comment on the proposals and the chance for my voice to be heard. I look forward to the Board of Fish members getting to spend time in Kodiak and learn more about our town and fishing community.

I humbly request the Board reject Proposal 61.

Sincerely,

Nicholas Hoffman
F/V Relentless



December 26, 2019

Quinn Alward

60082 Clarice Way

Homer, AK 99603

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

RE: Opposition to proposal 61

Dear Chairman Morisky and board of fisheries members,

My name is Quinn Alward and I have grown up seined salmon in the waters of Kodiak with my family since I was 10. After over a decade of working both on the deck and in the skiff of our family owned and operated boat, I still love it and intend on continuing on fishing as long as I can.

I oppose proposal 61 that intends to make several changes to the Cape Igvak management plan. The Cape Igvak section is a special area to me and being able to fish it when it's opened has helped me make enough money to pay my way through college.

The current Cape Igvak management plan has been in place since 1978 and over the last few decades numerous proposals have been brought up trying to shift the allocation of Cape Igvak fish to the Chignik area. Every time the board of fisheries has deliberated the proposals it has applied their Sustainable Salmon Policy, the Mixed Stock Fisheries Policy and their Allocation Criteria always ending in with the determination that no changes were warranted.

Proposal 61 seeks to make several changes to the Cape Igvak management plan that has been in place since 1978. First it asks to raise the Chignik harvest trigger that allows an Igvak fishery from an expected 600,000 fish harvest in Chignik by two thirds to a one million fish harvest. Second it asks that if the Chignik harvest is expected to be less than the new trigger of the two thirds higher number of one million fish then the Cape Igvak fishery cannot open until Chignik has harvested 600,000 fish which is double the current number of 300,000 fish. Third change is to the current language which states that "after July 8th after 300,000 fish are harvested in Chignik and Chignik escapement goals are being met the department may manage a fishery as long as Chignik is expected to harvest 600,000 fish". The proposed change would say that now 600,000 fish would have to be harvested before instead of after July 8th and that Chignik would have to be expected to harvest one million fish instead of 600,000 before the department would be allowed to manage an Igvak fishery. Fourth this proposal would change the definition of the Chignik sockeye salmon harvest from current language to exclude two areas of Chignik sockeye harvest from the "Chignik sockeye salmon harvest" that the Cape Igvak allocation is



based on which would reduce the traditional Kodiak allocation of Chignik sockeye salmon. Fifth change this proposal looks to make is under the current plan Igvak may not open before the first fishing period of the Chignik area and the proposed change would create a 72 hour delay before Igvak may open. The last change this proposal seeks to make is changing the date that the plan's allocation method will be in effect from July 25th to July 8th. As I read this language change it would close the Igvak section from July 8th to July 25th.

The proposal would take away almost half of the time we can fish in Cape Igvak with no solid justification.

For this reason I ask that you oppose proposal 61 and by not adopting it, help me and my family continue on with fishing traditions I've known most of my life.

Sincerely,

Quinn Alward



December 24, 2019

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

Re: Opposition to Proposal 61

Dear Chairman Morisky and Board of Fisheries Members,

I am Richard Roth, Kodiak salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife, three children and I reside in Homer, but fish in Kodiak. I own and operate the F/V Sea Tzar. Previously I owned and operated the F/V Kelly Girl. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before *any fishing at Igvak occurs*. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak.

The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits.

I ask that the Board reject proposal 61 and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,
Richard, Amanda, Stephanie, Noah, and Ranger Roth
F/V Sea Tzar
Homer, Alaska



December 19, 2019

Robert Fellows

266 E Bayview Ave.

Homer, AK. 99603

Alaska Board of Fisheries

Board Support Section

PO Box 115526

Juneau, Ak. 99811-5526

RE: Opposition to proposal 61

Dear chairman Morisky and Board of Fisheries members,

I am a commercial fisherman and have commercially fished salmon in the Kodiak management area for the past 29 years. I depend on this fishery under its current management plans to make most of my family's yearly income. I rely on the historical access to the Cape Igvak section, during years of harvestable surplus in the Chignik management area, to help make it viable to make a living in the Kodiak management area. I respectfully request the Board reject proposal #61.

By asking to raise the trigger level this proposal effectively eliminates any opportunity for an opening in the Cape Igvak section. The Cape Igvak management plan is one of the longest standing management plans. It works very well as is and has safeguards built in to ensure escapement for the Chignik management area and ensures Chignik fishermen have opportunity and that they get to fish first.

Sincerely,

Robert Fellows



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

see comments from proposal #60



RE: PROPOSAL 61 Amend the Cape Igvak Salmon Management Plan to increase the minimum expected sockeye salmon harvest thresholds from 300,000 to 600,000 prior to July 8 and 600,000 to 1,000,000 fish after July 8, and from 600,000 to 1,000,000 fish in years when runs are as strong as expected

December 24, 2019 Alaska Board of Fisheries Board Support Section P.O. Box 115526 Juneau, AK 99811-5526 Re: Opposition to Proposal 61 Dear Chairman Morisky and Board of Fisheries Members, I am Steve Roth, Kodiak and Lower Cook Inlet salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife and I reside in Homer, but fish in Kodiak. I own and operate the F/V Sea Grace. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures. This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen. The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before any fishing at Igvak occurs. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state. If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak. The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits. I ask that the Board reject proposal 61 and not make any changes to the Cape Igvak Management Plan. Thank you for your careful consideration, Steve and Jenny Roth F/V Sea Grace Homer, Alaska



December 24, 2019

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

Re: Opposition to Proposal 61

Dear Chairman Morisky and Board of Fisheries Members,

I am William Roth, Captian of the F/V Sea Chantey. I own a Kodiak seine permit and have been fishing it for the lasat 5 years as well as working as crew since 2010, I rely mostly on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

This proposal seeks to further limit Kodiak's traditional Cape Igvak fishery. Kodiak's salmon fishery has not changed since management plans were adopted starting with the Cape Igvak plan in 1978 and continuing through the early 1990s. Kodiak's salmon fishery is not a "new and expanding" fishery. This proposal is a familiar effort to limit the small portion of sockeye take that Kodiak fishermen are allowed in the Cape Igvak plan only after significant safety thresholds are reached by Chignik fishermen.

The Cape Igvak management plan was created because fishing there was part of Kodiak's historic fishing patterns prior to limited entry in 1973. The plan was put in place in 1978 to allow Kodiak fishermen access to their historic allocation of fish harvested during June and July. Kodiak's fishing opportunities at Cape Igvak are based off of existing built-in conservation measures designed to protect Chignik's second run with a safety net of 300,000 early run sockeye and 600,000 total sockeye for Chignik fishermen before *any fishing at Igvak occurs*. This purpose of this threshold is to prevent conservation issues during weak Chignik runs. This plan has been repeatedly evaluated by the Alaska Board of Fisheries through time, making it one of the most long-standing and intensely scrutinized management plans in the state.

If there are poor returns in Chignik, the current plan ensures that Kodiak fishermen won't fish at Igvak.

The 2019 Chignik Salmon Season Summary shows total values and average value per active permit in the Chignik Management Area in recent years, except for 2018, seem on track for what appears to be a normal range for the CMA within the last ten years. The 2019 season saw 51 active permits with a value per permit of \$157,072, which is very close to a decade ago with a 2009 season of 55 permits and a value per permit of \$156,926, much greater value than Kodiak permits.

I ask that the Board reject proposal 61 and not make any changes to the Cape Igvak Management Plan.

Thank you for your careful consideration,

William and Kaytlen Roth
F/V Sea Chantey
PO BOX 1230
Homer AK
99603



December 24, 2019

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

Re: Opposition to Proposal 62

Dear Chairman Morisky and Board of Fisheries Members,

I am Alex Roth, Kodiak and Lower Cook Inlet salmon purse seine permit holder. Thank you for the opportunity to comment on proposals for the Kodiak finfish meeting. My wife and I reside in Homer, but fish in Kodiak mainly. I own and operate the F/V Wandering Star. We rely solely on salmon seining for our livelihood and annual income to support our business, our family and contribute to our Alaskan economy through business and personal expenditures.

The author of this proposal argues that Kodiak fishermen are intentionally misreporting fish caught in Cape Igvak area. The Alaska State Troopers previously issued a public report saying that they had examined numerous vessels traveling across Shelikof Strait from the Cape Igvak area, and all of the fishermen had already delivered and properly reported their harvest.

This proposal shows a complete lack of understanding of the geographic realities of fishing the region. In addition to assisting ADF&G in sustainably managing salmon stocks, the Processors in our region would be greatly displeased with the quality of fish that travel across Shelikof Strait and are held for extra time by fishermen. This alone would completely negate the “economic incentive” argument of the author.

This is the second time the Board of Fisheries has had to deliberate on this proposal which would increase the time and financial commitments of ADF&G with absolutely no benefit to any region and would be overly burdensome to Kodiak salmon fishermen.

I request that the Board reject this proposal based which seems to be simply personal assumptions as to the character of their fellow fishermen in another region.

Thank you for your careful consideration,

Respectfully,

Alex and Jaime Roth
F/V Wandering Star
Homer, AK



RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section and upon leaving the section

Bo Calhoun 57177 Zulu Ct. Homer, AK 99603 12/26/19 RE: Opposition to Proposal #62 Dear Chairman Morisky and Board of Fish members: I'm a third generation Kodiak salmon seiner. I was born in Homer, raised in Port Lions and Homer, and continue to live in Homer. My wife and I hope to raise our two sons on our family seine boat in a healthy Kodiak salmon fishery. I respectfully request you reject Proposal #62. I have never heard of anyone intentionally misreporting Cape Igvak caught fish, or fish from any other area. Beyond having confidence that we generally try to do the right thing, the incentives for an individual to do so are extremely weak. One delivery out of many has very little likelihood of changing our chances to get more fishing time in Cape Igvak section. Also, enforcing proposal #62 would be an unnecessary burden to management and enforcement. Please reject proposal #62. Thank you for taking the time to read public comments. Sincerely, Bo Calhoun



December 26, 2019

Dear Chairman Morisky and Board of Fish members:

I oppose Proposal 62 for the following reasons. But first a story: In 1982 when I fished Chignik on a medical transfer on the seiner Moondance, I had to cut my seine in half to fish the inner Chignik District after fishing a month in the outer district. After talking to several local fishermen, many said that you can 'fudge' the length to 130 fathoms. On opening day in July off the beach in front of the lagoon, I along with 15-20 other vessels set our nets. I was the shortest net there, and the only one that got 'busted'. I went back to the cannery dock, cut the extra length off and fished a shorter net than the rest of the fleet for the rest of the season.

Although the above story has nothing to do with Proposal 62 – 'Reporting prior to fishing and prior to leaving Cape Igvak' It does highlight the fact that management cannot regulate honesty and in addition, it is my belief that if it happens at all (miss-reporting area fish caught) this proposal due to the logistics of tendering and weather in the Cape Igvak district is unenforceable.

Thank you for your consideration of my comments and again urge you to reject Proposal 62.

Sincerely,
Bob Bowhay
M/V Moondance
P.O. Box 187
Kodiak, Alaska 99615
907-486-4594



RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section and upon leaving the section

My name is Brian Mcwethy. I was born and raised in Kodiak. I live in Kodiak with my family and we all depend on my income. I fished with my father on his seiner growing up and now I own and operate a seiner. Salmon seining and Tanner crab fishing in Kodiak are currently our only sources of income. I plan to try and continue to fish the Kodiak waters and possibly my children will have the opportunity to. I hope the current and historical areas we fish aren't taken from us and the future generations of Kodiak. I oppose this proposal. It is unrealistic for everyone to do this. ADFG would have to constantly be having to monitor the fishing boats at all hours of the day as the fisherman typically travel overnight and fish during the day. This would put a burden on the fishermen and processors and the ADFG's already strained manpower. There isn't any real incentive to misreport as it is already illegal.



Charles and Theresa Peterson
1850 Three Sisters Way
Kodiak, AK 99615

December 26, 2019

Chairman Reed Moriskey
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Oppose Proposal 62

Dear Chairman Morisky and Board of Fish members:

We moved to Kodiak in the 1980's to pursue the opportunity for a livelihood in commercial fishing. We found what we were looking for, a chance to make a living off the sea and stayed, raising three children and developing deep relationships in our island home. Kodiak is a community built on fish and the size of the fleet, the processing infrastructure, the support services and the overall health of our coastal community is dependent on sustainable fisheries. Salmon fishing is the mainstay of our commercial fishing business and without it we would not have the financial means to stay in Kodiak, maintain a vessel and prosecute other fisheries. We own a 42', shallow draft seine vessel that primarily operates in the Alitak district. Our son now runs the boat and Charles and I run a setnet site in Alitak Bay. We choose to diversify our salmon fishing with participation in both the seine and setnet fishery so our son can run the boat with his crew and the rest of the family can prosecute the fishery from a shore-based operation.

We are opposed to proposal 62 and see this as an accusatory proposal without merit. There are no grounds to base this proposal as there have never been indications of misreporting nor have there been enforcement concerns. The management challenges for this proposal would be time consuming, costly and potentially dangerous for the seine fleet. As the fishery opens at 12:01, ADF&G staff would need to be available to check in, requiring valuable use of time and resources to appease an insinuation of a unfounded illicit behavior. What happens if a vessel is unable to reach ADF&G due to technical difficulties getting through? Does this mean they cannot anchor and have to travel back across to Kodiak? This proposal is costly, unnecessary and disparaging and we encourage the board to oppose it.

Sincerely,

Charles and Theresa Peterson

Charlie johnson

12/27/2019 07:38 PM AKST



PC188
1 of 1

**RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section
and upon leaving the section**

Landings are already reported on fish tickets from the igvak section.



December 22, 2019

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

Re: Opposition to Proposal 62

Dear Chairman Morisky and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak, Alaska. I grew up fishing on my dad's boat and got my first crew job working for someone else two weeks after I graduated high school. I haven't missed a salmon season since. I bought into the fishing industry in 2011 with the purchase of a 25-foot jig boat that I worked for two years in the winter and spring months while I still crewed for salmon in the summer. Access to the jig fisheries focusing on cod and rockfish was the only way that I could afford to move into the salmon fleet with a 38-footer in 2013. After the recent cod collapse, I now primarily rely on salmon seining and live here year-round with my wife.

The proposer makes the baseless argument that Kodiak fisherman are liars and intentionally misreport fish caught at Cape Igvak. The number of fish that would need to be misreported would have to be so great to impact any change to the allocation that it is an unrealistic accusation. This proposal shows a complete lack of understanding of the geographic realities as well as sociocultural values of our regional fishery. There are also logistics concerns regarding how fishermen would report by "telephone, radio, or in person to a local representative of the department". For example, I don't have a TRAC phone. How am I supposed to talk to ADF&G before and after fishing at Cape Igvak? It also creates much more work for ADF&G staff for a completely unnecessary requirement that is based off the proposal author's personal assumptions rather than factual context.

Furthermore, this is the same proposal that was submitted at the last Board of Fisheries meeting in Kodiak. Here we are again having to defend against a flagrantly rude proposal that I honestly believe is a waste of the Board's time and energy. The last time this came up the Alaska State Troopers issued a public report saying that they had examined numerous vessels traversing the Shelikof Strait from the Cape Igvak area, and all of the fishermen had already delivered and properly reported their harvest.

Taking away any fishing opportunity from Kodiak fishermen, particularly from the small boat fleet, would have a direct negative impact on new entrants trying to gain a foothold in this industry, fishing families trying to get by, and fishing support businesses in our region. I'm proud to call Kodiak home and am working to protect our fishing way of life.

Sincerely,
Chris Johnson
F/V North Star



RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section and upon leaving the section

Adding this bureaucratic burden to an already underfunded ADF&G department is unwarranted and a waste of resources. There is no valid incentive for Kodiak fishermen to misreport their catch in the Cape Igvak section. The canneries that Kodiak fishermen work for require fishermen located anywhere on the mainland side of the Shelikoff to deliver daily in order to provide fresh fish to the processors. Furthermore, no captain in their right mind would waste fuel and time driving to another section to report their catch.



December 22, 2019

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

Re: Opposition to Proposal 62

Dear Chairman Morisky and Board of Fisheries Members,

My name is Danielle Ringer and I appreciate the opportunity to comment on proposals before the Board in writing and in person for the Kodiak finfish meeting. I live in Kodiak with my husband and we own and operate the 38-foot F/V North Star. We chiefly rely on salmon seining and cod and rockfish jigging to maintain our fishing way of life and ability to live on Kodiak Island. I grew up in Homer learning to harvest and process fish from my parents in Kachemak Bay and dipnetting on the Kenai River. I hold a Master's degree from the University of Alaska Fairbanks in Political Ecology of Fisheries and was one of the researchers on the *Graying of the Fleet in Alaska's Fisheries: Defining the Problem and Assessing Alternatives* study in the Kodiak region.

The proposer makes the baseless argument that Kodiak fisherman are liars and intentionally misreport fish caught at Cape Igvak. The number of fish that would need to be misreported would have to be so great to impact any change to the allocation that it is an unrealistic accusation. This proposal shows a complete lack of understanding of the geographic realities as well as sociocultural values of our regional fishery. There are also logistics concerns regarding how fishermen would report by "telephone, radio, or in person to a local representative of the department". For example, we don't have a TRAC phone. How are we supposed to talk to ADF&G before and after fishing at Cape Igvak? It also creates much more work for ADF&G staff for a completely unnecessary requirement that is based off the proposal author's personal assumptions rather than factual context.

Furthermore, this is the same proposal that was submitted at the last Board of Fisheries meeting in Kodiak. Here we are again having to defend against a flagrantly rude proposal that I honestly believe is a waste of the Board's time and energy. The last time this came up the Alaska State Troopers issued a public report saying that they had examined numerous vessels traversing the Shelikof Strait from the Cape Igvak area, and all of the fishermen had already delivered and properly reported their harvest.

I see no biological, scientific, historical, economic, nor sociocultural reasons that could justify the Board making any changes to the Cape Igvak management plan with this reporting requirement based off of personal assumptions. Thank you for your consideration of my comments and I look forward Board of Fisheries members spending time in our fishing community during the Kodiak meeting. I humbly request the Board to reject this proposal.

Respectfully,
Danielle Ringer, M.A., F/V North Star



December 22, 2019
Darren Platt (FV Agnes Sabine)
10708 Birch Cir
Kodiak, AK 99615

Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Oppose Proposal 62

The members of the Alaska Board of Fisheries,

I'm writing in **Opposition to proposal 62**, which intends to create reporting requirements for vessels fishing in the Cape Igvak area. This proposal implies that Kodiak fishermen are perpetrating a scam and regularly breaking the law. It is offensive and meritless. I have never heard of fisherman misreporting their Igvak harvest and most processors require delivery before leaving Igvak, anyways, unless the fisherman is coming straight to town.

Do they think we are delivering at Igvak and instructing our tenders to lie on our fish tickets and report a harvest area? If so, then it would be extremely easy to verify that this is happening.

Otherwise, do they imagine that we are traveling back across the Shelikof straight with fish on board and our refrigeration systems running just because we think that delivering the fish elsewhere *and* illegally reporting the fish as being harvested outside of Igvak may lead to more fishing opportunities? If so then the cost of doing this is far higher than any payback the fisherman could expect, so why would anyone do this? There is no individual incentive in this scenario.

As far as I'm aware there has never been a single reported case of this lawbreaking behavior, but yet again we have to defend ourselves against baseless allegations. This proposal would cost the state money and busy our fleet with needless communications. I think at some point, the accusers who repeatedly submit this proposal should at least provide some shred of evidence that the alleged malfeasance is actually occurring. Otherwise, this proposal is just a groundless insult hurled at the Kodiak fleet.

Thank you,
Darren Platt



RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section and upon leaving the section

This proposal is awkward, cumbersome, and pointless. The law already provides for area of catch reporting. Modern quality control requires unloading to tenders in the area. Fuel costs, travel time, and quality control already support the reporting in management area rules.



RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section and upon leaving the section

Dear Chairman and Members of the Board, As a young fishermen who is working their way into the Kodiak Salmon fishery this proposal will cause Kodiak fishermen to lose a substantial amount of their catch. I have been investing into the Kodiak salmon fishery as much as possible, in 2019 I purchased a Kodiak salmon permit. I ran a seiner for the month of august. I plan on running the same boat for the entire 2020 salmon season in Kodiak. This only adds another inconvenience to fishermen and ADF&G, fishermen dont always know what they are going to do. What if you head to igvak at 8 pm and want to get the first set at 5 am. No one will be in the office to report to and will know where you are, do you have to wait till fish and game opens to report that you are at igvak? This proposal is unnecessary. When I was younger I remember testifying against proposals similar to these. These proposals are re-allocations of Kodiak historical catch. Kodiak has always had intercept fisheries and we already have management plans in place that have been effective for the Kodiak salmon fishery. Please help ensure the future for young fishermen entering into the Kodiak Salmon fishery, and the people who have been investing and are established in the fishery. Thank you for considering these comments, Garrett Kavanaugh



RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section and upon leaving the section

Dear Chairman Morisky and Board of Fish members: I am 31 years old and a life long resident of Kodiak. I grew up set netting in Uganik on the west side of the island with my mother until i was 14. I then started seining with my father until I was able to buy my own Kodiak seine operational the age of 27. Please oppose proposition 62. It is already against the law to miss represent where our fish have been caught. thank you for your time sincerely Iver Holm



**RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section
and upon leaving the section**

There are already laws for this concerning fish ticket reporting.



**RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section
and upon leaving the section**

My name is Jamin Hall, my wife and I have a set net site in Uganik Bay. I am writing in opposition to proposal 62.



RE: PROPOSAL 62 Require reporting prior to commercial fishing in the Cape Igvak Section and upon leaving the section

The reasons stated by the Author of this proposal are ridiculous! First of all, no one in there right mind would run the fish across the Shelikof due to the possibility of weather and time jeopardizing the quality of the product. Also, the canneries send tenders over and insist the product be delivered before being able to fish around the island again.



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

December 27, 2019

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

RE: CAPE IGVAK MANAGEMENT PLAN
Chignik Proposals 58, 59, 60, 61, 62

Dear Chairman Morisky and Board Members:

The Kodiak Salmon Work Group (KSWG) is an ad hoc committee created to address the issues of Cook Inlet bound sockeye captured in the Kodiak Management Area and the continuation of the Cape Igvak Management Plan. Membership is open and encompasses seiners from both Kodiak seine organizations, setnetters from both Kodiak setnet organizations, beach seine permit holders and processors. In other words, all of Kodiak's salmon fishing community. The group is supported by voluntary stakeholder contributions including those from the City of Kodiak and the Kodiak Island Borough.

KSWG is herewith submitting several documents for the Board's review: 1. Structure and Function of the Kodiak Management Area Salmon Fisheries; 2. Review of Cape Igvak Salmon Management Plan and Proposals to the Alaska Board of Fisheries; and 3. Economic Analysis of Proposals 58, 60,61 and 64. An informational map is attached as well.

Cape Igvak Management Plan (Proposals 58-62)

Chignik's four substantive proposals regarding the Cape Igvak management plan don't outright request that the Board set aside the plan. Instead they focus on provisional changes that would gut Kodiak's Cape Igvak fishery. Proposal 58 with the date change would reduce, on average,



Kodiak's fishery by 79%. Proposal 59 is an accounting change that would reduce the Cape Igvak fishery by about 20%. Proposal 60, like proposal 58, would reduce Kodiak's revenues by about 67% and proposal 61 comes in with a 69% reduction. The fifth proposal (Proposal 62) is a record-keeping proposal that is untenable.

The Cape Igvak Management Plan is embedded in the Mixed Stock Fisheries Policy: "Most mixed stock fisheries are long standing and have been scrutinized many times by past Boards.

Consequently, existing regulatory management plans are understood to incorporate conservation burden and allocation" (Allocation Criterion 2). Chignik's guaranteed catch allocation of 300,000 fish (early run) and 300,000 (late run) was a clear balancing in the original plan, favoring Chignik by providing an economic safety net. In addition, Kodiak would share the conservation burden in that the escapement would be assured before Kodiak would go fishing. On the other hand, if Chignik gets its escapement and minimum guaranteed catch, then Kodiak is allowed to harvest up to approximately what was historically caught in the fishery. This is a fairly balanced plan, if not already overbalanced to Chignik's advantage!

Also, the Board states in Allocation Criterion 3, "The policy should recognize that salmon resources are generally fully utilized and that stability is an important aspect of the fisheries." Why is stability important? Many salmon stakeholders make investments and commitments based on regulatory stability. If salmon management plans are subject to change with every Board cycle, fishery values (ex-vessel, permit and gear) will decrease as uncertainty increases, conservation may be compromised, and stakeholders will be encouraged to try to "get a better deal" at each successive Board meeting.

The history of the Cape Igvak Management Plan (Allocation Criterion 1) is of critical importance to understanding why it was developed and how it was balanced between stakeholders. Prior to the plan Kodiak could fish at Cape Igvak any day that the Chignik fleet fished. The "day for day" fishing caused area managers concern that Kodiak's fishing could impact a weaker "second run" to Chignik. Consequently, the catalyst for the Cape Igvak Management Plan was conservation of Chignik's runs. The plan balanced the conservation burden between the two areas. The plan has been in place for 42 years and has had constant review over multiple Board cycles. Its durability establishes it as one of the marquee fishery management plans in the State of Alaska. Changing a



plan of such long duration without significant “new information” or “new fishing patterns” or “stock of concern” assessments or anything other than a proposer’s feeling that something should be changed, compromises and undermines the Board’s standing as a fair and impartial deliberative body.

The functionality of the Cape Igvak Management Plan as a conservation plan is seen in the plan’s application over the past five years. Because of low Chignik escapements there was no Cape Igvak fishery during 3 seasons. Period! Kodiak cannot be held responsible for any of the current biological or economic issues in Chignik due to low Chignik sockeye returns. Kodiak did not fish at Cape Igvak.

The proposer’s assertion, under Allocation Criterion 4, that Kodiak’s salmon fishermen have more “alternative resources” is a false assertion. If this means that Kodiak has more salmon numerically or by species, then the Board must also recognize that Kodiak’s salmon are divided between approximately 180 active seine fishermen and approximately 150 setnet fishermen ---in contrast to about 75 active Chignik permits. Resource availability is reflected in individual gross earnings. Chignik permits, on average over time, continue to earn more than Kodiak fishermen and, consequently, their permits are worth more in the market. “Alternative resources” in this sense would mean that Kodiak had less “alternative resources” per active permit holder than Chignik.

If the “alternative resources” idea means that Kodiak has more “species” available than Chignik salmon fishermen, this too is false. Both Kodiak and Chignik fishermen have access to halibut and cod in their areas although the Federal cod season is now closed in both areas. Only two or three Kodiak salmon fishermen are involved in the Gulf of Alaska trawl fisheries --- a fishery that limits participation with high costs of entry. Both Chignik and Kodiak have historically had a Tanner crab season. While Kodiak currently has a very small Tanner crab quota, only a subset of the Kodiak salmon fleet (like the Chignik fleet) have limited entry permits for the Tanner crab fishery. The Kodiak herring fishery is essentially gone. Kodiak fishermen, especially those from Old Harbor, Akhiok, Ouzinkie, Port Lions and Larsen Bay just don’t see what “alternative resources” are available in Kodiak that Chignik doesn’t have. All rural communities in the Gulf of Alaska under about 1,500 people are struggling to survive on their fisheries economy--- which is now almost exclusively salmon.

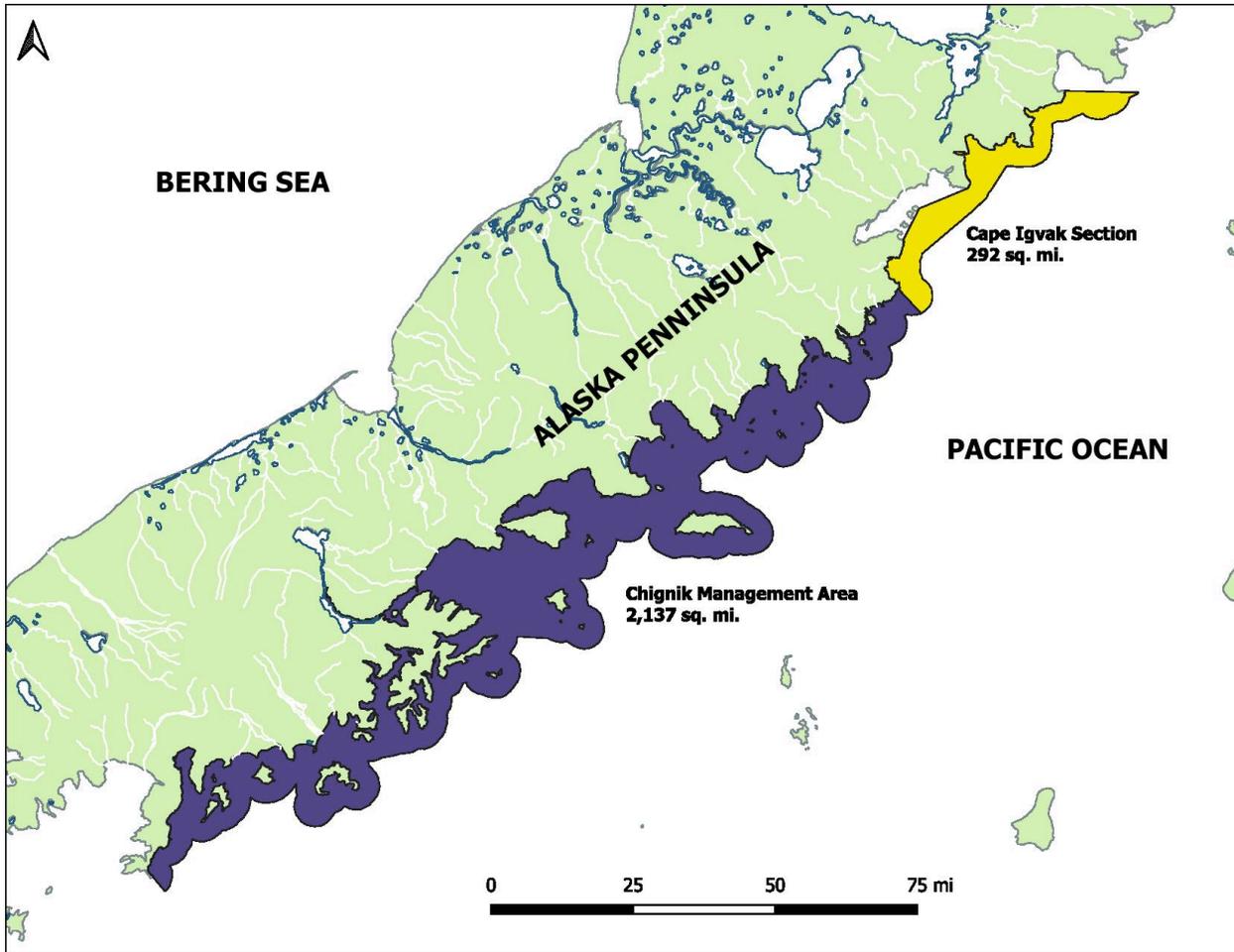


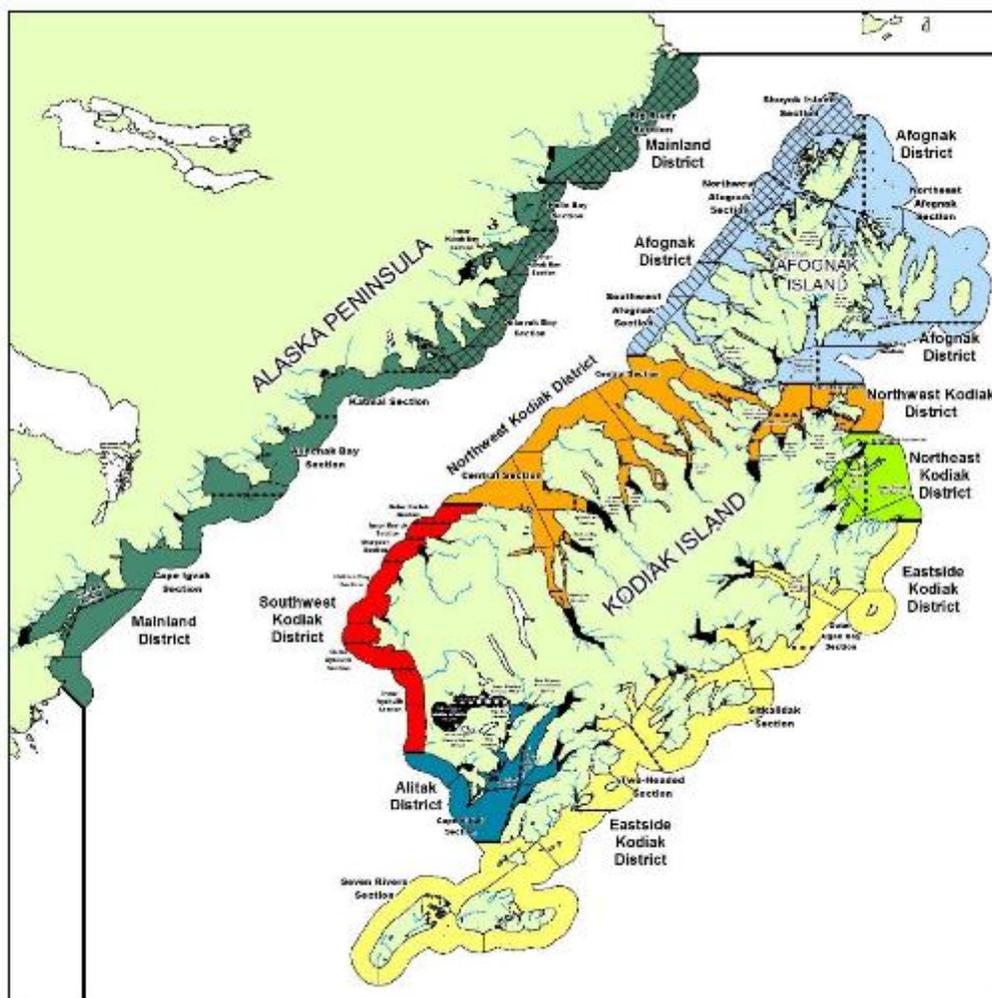
Finally, “The importance of the fishery to the economy of the region and the local area” (Allocation Criterion 7) favors Kodiak. The loss of the Cape Igvak fishery would cost Kodiak fishermen, on average, almost 4 million dollars. At best, the Igvak fishery would increase earnings by a subset of fishermen that actually live in Chignik or the Chignik region by less than an average of 12.0%. While not insignificant, the Igvak fishery is of reduced “importance to the economy of the Chignik region” when compared with the decline of active vessels and the number of Chignik fishermen that are now fishing in Kodiak and Prince William Sound. See further: [Review of the Cape Igvak Management Plan and Proposals to the Alaska Board of Fisheries, Proposal 58 Economic Analysis, Proposal 60 Economic Analysis and Proposal 61 Economic Analysis.](#)

In summary, it is the position of the Kodiak Salmon Work Group that the Board should vote NO on proposals 58, 59, 60, 61, 62 and 63. These proposals are not supported by the Board’s allocation criteria and do not have a rational relationship to Chignik’s conservation needs.

Very truly yours,

Duncan Fields, Chairman





Review of Cape Igvak Salmon Management Plan and Proposals to the Alaska Board of Fisheries

Kodiak Salmon Working Group

Executive Summary



- The Cape Igvak Salmon Management Plan (CISMP) has been in place since 1978 and allocates 15% of total Chignik sockeye harvest to Cape Igvak (Kodiak Management Area) after Chignik is guaranteed 600,000 harvest from early and late runs combined, and escapement goals are projected to be met.
- Management strategies under CISMP have been very successful in meeting the sockeye allocation objective and providing escapements within goals.
- Recent genetics studies are robust, but limited sampling with highly variable results does not in itself justify changes to the management plan.
- Genetic results show that the current regulatory assumption that 90% of Igvak sockeye harvests are Chignik bound fish is overly conservative; all samples showed substantially lower contributions of Chignik-bound sockeye to the Igvak harvests.
- Board of Fisheries proposals to alter metrics guiding the Cape Igvak Salmon Management Plan are not well supported by available data.
- The long-standing Cape Igvak plan appears to be working well in terms of limiting harvest of Chignik origin sockeye through harvest guarantees to Chignik, and meeting escapement goals for early and late runs of Chignik sockeye.

Cape Igvak Salmon Management Plan



A purse seine fishery has been active along capes in the Cape Igvak section of Kodiak Management Area (KMA) since 1964. Following a tagging study in 1969 (ADFG, unpub. data) where 84% of released tags were recovered in Chignik Area fisheries, periodic modifications to the fishery were directed by the Alaska Board of Fisheries. In 1978, the Cape Igvak Salmon Management Plan (CISMP) was adopted to restrict harvest of Chignik bound sockeye at Cape Igvak. The fishery is one of two in the state (the other is the Southeast District Mainland, Area M) in which harvest and escapement triggers from an adjacent management area (both Area L-Chignik) must be met before the fishery can open. From beginning of the fishing season to July 25, Chignik fishermen must harvest a minimum of 600,000 sockeye salmon (300,000 from both early and late Chignik runs) and adequate escapements for both runs must be projected to occur before harvest will be allowed in Igvak. KMA fishermen at Cape Igvak are allocated 15% of the total Chignik harvest. The Board stipulates that 90% of the harvest at Igvak and 80% of the harvest in Southeast District Mainland (Area M) are Chignik bound fish (Anderson et al., 2019, Wilburn, 2019). Proposals to the Board for the 2020 Kodiak Management Area focus on specific metrics in the plan.

Since the CISMP plan came about, management has been very effective at meeting the allocation objectives in the plan. Only four times in forty years has the 15% target been exceeded by more than 1% (Anderson et al., 2019), which is probably within reasonable expectations for management error. Harvests of Chignik bound fish at Igvak obviously go up and down with Chignik harvests and the Igvak fishery has been closed, or catches extremely low, three times between 2014 and 2018 due to poor runs and lower harvests in Chignik. On the other hand, Igvak sockeye harvests were much more robust in 2011 and 2013 when Chignik sockeye harvests exceeded 2 million sockeye (Anderson et al., 2019). While Chignik sockeye harvest was

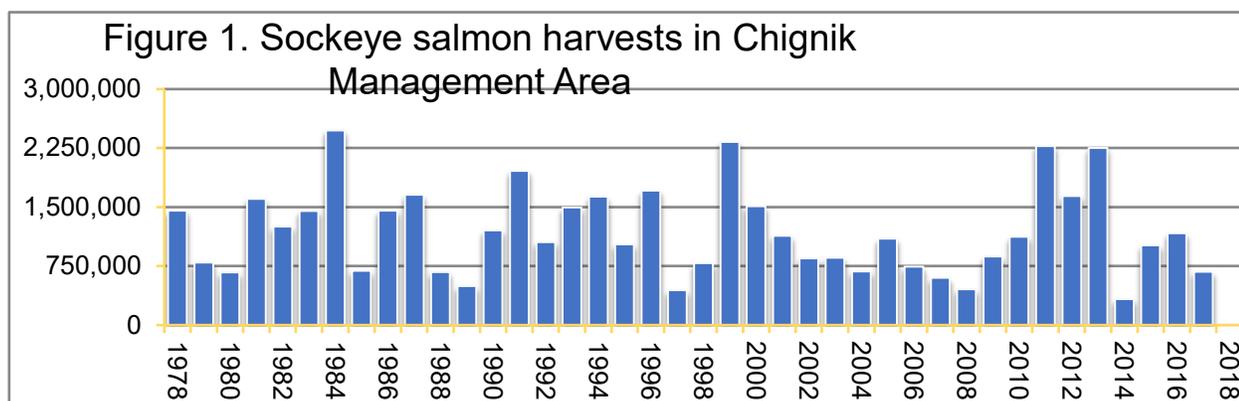


essentially zero for 2018, the forty year history shows wide fluctuations, with two of the lowest and two of the highest harvests occurring in the past ten years (Figure 1). Average Chignik sockeye harvests between 1998 and 2018 were about 15% lower than harvests in the previous two decades, 1978-1997. However, three of four harvests over 2 million fish were also in the most recent two decades (Figure 1).

The management plan has also been effective from a conservation and sustainability standpoint. Early and Late sockeye runs to Chignik River have met or exceeded their respective escapement goals every year since 1980, until the run failure in 2018, when the early Chignik sockeye run failed to meet the escapement goal (Munro, 2019).

Recent Genetics Studies in Igvak Section

In the recent fishery genetic stock identification study in KMA, Shedd et



al. (2016) added two sampling strata (early and middle) for Cape Igvak

Section in each of the three study years, 2014-2016. No Igvak samples were taken in 2014 because low Chignik harvest numbers kept the area closed to commercial harvest. In 2015, only the July stratum (middle) was sampled as Igvak was again closed in June due to inadequate sockeye harvests in Chignik Management Area. Harvest of Chignik fish in Igvak was estimated as 2,059 fish (total harvest 6,595) in the middle stratum, 2015. In both 2014 and



2015, the management plan had its intended effect of keeping Igvak closed or limited when Chignik harvests were low. In 2016, with a stronger Chignik run, an estimated 114,412 Chignik sockeye were harvested in the early (June) stratum. An estimated 10,006 Chignik bound sockeye were harvested at Igvak in July (Shedd et al., 2016).

While it is clear that Chignik fish were captured at Igvak in both years, with only three temporal strata sampled over a three year period, including a single datum for early strata harvests, specific conclusions about patterns of presence, magnitude or vulnerability of Chignik bound fish in Igvak fisheries are unwarranted. The single early (June) stratum sampled from the three year period estimated harvest of Chignik bound sockeye an order of magnitude larger than the two middle stratum harvests from 2015 and 2016. These data emphasize wide variation for Chignik bound sockeye harvests at Cape Igvak, and do not support substantive changes to the current management plan.

Data in Shedd et al. (2016) also does not support the presumption in the management plan that 90% of sockeye salmon harvests in Igvak are Chignik bound fish. The single middle stratum (July) estimate from 2015 found 31.2% Chignik sockeye from a total harvest of 6,595. The middle stratum estimate from 2016 was much lower, where only 5.6% of the sampled harvest were Chignik fish (total harvest 177,315). The sole early stratum (June) contribution in 2016 was much higher, estimating 74.1% of Igvak harvests were Chignik origin (total harvest 154,318), but still did not reach 90%. The assumption that 90% of Igvak harvests are comprised of Chignik bound fish is very uncertain. Other genetic studies suggest uncertainty for similar assumptions in Southeast District Mainland (SEDM, Area M) fisheries, where Chignik bound sockeye are thought to represent 80% of sockeye harvested. Dann et al., (2012), showed that the overall proportion of Chignik bound fish harvested in SEDM was very consistent in 2010, 2011, and 2012



at 65%, 67% and 66% respectively, excluding the Northwest Stepovak Section in July.

Board of Fisheries Proposals

There are five proposals before the board which address the Cape Igvak fishery. Four of these seek to more severely curtail the fishery through specific alterations to metrics of the management plan. They propose completely eliminating fishing at Igvak prior to July 8 (proposal 58), lowering the board approved allocation of Chignik bound fish to KMA fishermen at Igvak from 15% to 5% (proposal 60), or dramatically raising Chignik harvest thresholds upon which Igvak fishery openings are predicated (proposal 61). A fourth proposal suggests that accounting practices for total Chignik harvest be changed such that harvests in Southeast District Mainland (Area M) and Igvak are no longer considered part of the Chignik total harvest. None of these proposals provide credible, data-driven justification for changing longstanding management plans. Recent genetic stock identification results reflect very limited sampling at Cape Igvak (Shedd et al. 2016) and as a result, insight regarding harvest patterns of Chignik sockeye in Igvak fisheries is narrow. There is no doubt that stock composition and harvest estimates are accurate and precise, but only three strata in two different years were analyzed, where estimated harvest numbers of Chignik bound fish at Igvak were an order of magnitude different between them.

- **Proposal 58** would close Cape Igvak to fishing until July 8, based on increases in KMA harvests and declines in Chignik harvests. However, Chignik fish represented a relatively minor component of Westside KMA harvests sampled in Shedd et al. (2016) and there is no data linking historical harvests in KMA to Chignik harvests.



Increases in KMA sockeye harvests over the years most-likely resulted from greater harvests of local sockeye stocks and sockeye from enhancement efforts by Kodiak Regional Aquaculture Association, which averaged about 345,000 during 2008 - 2017 (Anderson et al., 2018). Though Chignik suffered a run failure in 2018, long term average harvests during 1998-2018 are only 15% smaller than those from 1978-1997.

- **Proposal 59** seeks to change fishery accounting practices in CISMP by eliminating SEDM and Cape Igvak harvests from the total Chignik sockeye harvest, for allocation purposes within the plan. Currently 80% of sockeye harvested in most areas of SEDM and 90% of sockeye in Igvak are assumed part of total Chignik harvest. The effect of this is that allocation percentages would be reached sooner and harvests at Cape Igvak would be smaller. If the management plan assumes a specific percentage of Chignik origin fish in SEDM or Igvak, it must be included in allocative accounting. It would be inappropriate to address only Igvak with such a proposal.
- **Proposal 60** would lower the allocation percentage of Chignik sockeye to Cape Igvak fishermen from 15% to 5% supposedly because at the inception of the management plan, KMA sockeye harvests were weak and Chignik harvests were robust, and now the situation is reversed. While KMA sockeye harvests have improved since 1978 due to local stock performance and enhancement efforts, there is no evidence that any declines of CMA sockeye harvests are tied to Cape Igvak sockeye harvests.



Chignik harvests show wide variation since 1978 as many salmon systems do. Two of the highest and two of the lowest Chignik area sockeye harvests have occurred during the last decade (Figure 1). This proposal would significantly reduce harvest in Kodiak's longstanding fishery at Cape Igvak without justification.

- **Proposal 61** would raise harvest thresholds for the early and late Chignik run combined from 600,000 to 1,000,000 sockeye before Igvak could open and guarantee a harvest of 1,000,000 sockeye to Chignik fishermen. The proposal would probably close the Igvak fishery. Justification is based on unstated changes in assumptions and economic conditions that have occurred since inception of the management plan. This is essentially the same proposal submitted to the Area M board meeting in 2019 to severely curtail the SEDM fishery, which the Board of fisheries rejected.

Proposal 62 creates mandatory reporting for vessels entering or leaving Cape Igvak section. It is likely unworkable and ineffective for fisheries managers to perform this monitoring.

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