

Madam Chairman, Members of the Board

My name is Axel Kopun, I'm from Chignik and a lifelong Chignik fishermen. I'd like to address ADF&G's scientifically indefensible and irresponsible decision to combine Chignik's two dominant stocks into a single stock for management purposes.

Rather than take into account the myriad of possible causes for the recent downturn in Chignik sockeye production, such as poor ocean survival, increased competition from hatchery fish, reduced fecundity, and historically unprecedented fishing time in Area M since 2004, the Department has chosen to base their entire justification for this plan on one simple assumption not supported by scientific data – that there is a single bottleneck in the Chignik watershed where Late Run juveniles outcompete Early Run juveniles in Chignik Lake.

The Department then decided to pick and choose the data they would use to build a case in support of this assumption. They have omitted volumes of good data completely and they have misrepresented findings from previous studies. In building their run reconstruction model, using data from the WASSIP study, they inexplicably omit all portions of it that show the interception of Chignik sockeye in the S. Unimak, Dolgoi Area, and Shumagin islands. They use only one data point, 2016, to change the Chignik component of the Cape Igvak Interception fishery and fail to mention well-known interception of Chignik sockeye around Kodiak Island itself. At the same time they are omitting the documented interception of Chignik sockeye in other areas they are also including the small Chignik harvest of some non-local sockeye stocks. There is no good scientific or moral reason to exclude the 47% Chignik component from the Dolgoi Area while insisting on using the mere 10% non-local sockeye harvest within the CMA in their model. That's not good science, that's the manipulation of data to fit an agenda. There is also zero consideration given to the fact that the years the WASSIP study occurred coincided with the worst 3 years of Chignik sockeye harvests in over 30 years.

Using their singular assumption and cherry-picked data, ADF&G decided to combine Chignik stocks into a single stock for management purposes. This increases the risk of overexploiting one of the stocks when it is weak, like the early run is right now. The fact the Department is not going to be using in-season

GSI to actually know how much of each stock they are passing through the weir elevates that risk, as can be seen in RC 40.

The Department has also failed to model the possible negative effects of these drastic changes and the impact it will have on the genetic diversity, subsistence and commercial fishermen of the Chignik Area. This process has not been open and transparent, nor peer reviewed - as good science must be.

The Policy for the management of sustainable salmon fisheries states that “depleted salmon stocks should be allowed to recover” and “diversity should be maintained to the maximum extent possible, at the genetic, population, species, and ecosystem levels.” Combining Chignik’s two dominant, distinct stocks into a single stock for management purposes clearly does not meet that standard.