



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

RC 107

Cape Igvak Summary

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”. Chignik’s guaranteed catch 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. Kodiak would share the conservation with Chignik because the escapement would be assured before either fleet could fish. 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.

1. **The Mixed Stock Policy further states**, “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.

2. **The history of the Cape Igvak Management Plan (Allocation Criteria 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 relationship of the plan to a problem 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. Claiming that the plan was based on the comparative value of the two fisheries, is not supported by the practices of the past 13 boards that have reviewed the plan.

3. Whenever the Cape Igvak fishery has occurred, Chignik residents have been able to meet subsistence and personal use goals (**Allocation Criteria 3**) 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, subsistence, biological or economic issues in Chignik due to low Chignik sockeye returns. Kodiak did not fish at Cape Igvak.

4. The proposer’s assertion, under **Allocation Criteria 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 a portion of Kodiak’s salmon are enhanced stocks and that the remaining wild stocks 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. (See comprehensive CFEC data)

5. 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.

6. Finally, "The importance of the fishery to the economy of the region and the local area" (**Allocation Criteria 6**) 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%. Fishermen living in Old Harbor or Ouzinkie could see their earnings reduced by as much as 25%.

The Chignik narrative submits that Allocation Criteria 6 would allow the Board to undertake some sort of economic value comparison between Chignik and Kodiak fisheries benchmarked by economic circumstances prior to 1978. Then, based on some sort of change in the comparative relationship between the two regions, management changes are justified. First and foremost, there is nothing about economic comparisons in Allocation Criteria 6. Chignik has confirmed economic decline in the Chignik fishery. However, it has not shown that the Cape Igvak fishery is responsible for that decline. Nor can it show that the Cape Igvak fishery will inhibit economic and biological recovery.

Note again the language of Allocation Criteria #6. "the importance of each fishery to the economy of the region **and local area** in which the fishery is located. The local area where the Cape Igvak fishery is located is Kodiak, not Chignik. As has been shown the fishery is very important to the Kodiak local area --- especially Kodiak's rural communities.