

## Alaska Trollers Association

130 Seward St., No. 205  
Juneau, Alaska 99801  
(907) 586-9400  
(907) 586-4473 Fax

February 23, 2015

### RE: Proposal 224 Trip Limit Fishery

**Goal:** ATA's intent is not to replace competitive troll fishery openings. This measure is suggested simply to help ensure that the troll fleet has an opportunity to catch its full allocation in years that ADFG determines that there are too few fish remaining to conduct an open access fishery. We have attempted to generate a proposal with very few moving parts, to ease the ADFG's workload and minimize confusion for trollers and enforcement.

### Trigger Point: $\leq 10K$ fish

ADFG would decide whether or not to conduct a trip limit fishery when there are up to 10K king salmon left on the troll quota. ATA would like to see the trigger kept at 10K or less, so that it does not preclude a competitive opening.

### Distribution

The number of fish remaining after the summer troll king openings would be distributed equally amongst the number of trollers estimated to fish in September.

**Duration:** Up to 10 days.

**Start Date:** No earlier than September 1<sup>st</sup>. No 'fair start' closure.

We request a fishery announcement regarding a possible trip limit fishery by Sept. 1, with an opening in September, to ensure enough time to catch as many of the remaining kings as possible. No 'fair start' needed. Note that by September king salmon are often less available in the Southeast region.

### Enforcement

Trollers would be required to keep the kings easily accessible and separate from the other species onboard.

Multiple deliveries will be allowed, but during the trip limit fishery all fish tickets that have king salmon on them must be retained onboard and available for enforcement scrutiny. This will allow enforcement to ascertain how many kings the permit holder has kept during the trip limit fishing period.

Fish tickets could be audited after the fishery to confirm compliance.

Once the trip limit fishery ends, all kings must be off loaded before continuing to fish coho, as is required for the July and August king openings. Possible exception for freezer boats (below).

Freezer boat operators could be allowed to deliver as they normally would, which could be some time after the trip limit fishery closes. Most trollers deliver fish every 3- 5 days, but freezer boats fish until they fill the boat and can be fishing for two weeks or more. In order to allow freezer boat operators to finish a coho trip with their 10 or so king salmon onboard, perhaps ADFG could require that they give notice of their intent to keep kings during the trip limit opening. Current regulations already provide ADFG a tool to require a call-in. Tickets could be audited for compliance with the call-in requirement and total king landings by date. Of course, ADFG could always require kings be offloaded at the end of the trip limit fishery, just like the rest of the fleet.

***The following concerns were raised in ADFG's staff comments. Our responses below and the trip limit proposal itself are an effort to alleviate those concerns. ATA is discussing this proposal with ADFG and hopes to come to mutual agreement on a trip limit option for the troll fishery.***

### **Estimating Number of Participants & Possible Permit System**

A permit system is unnecessary. Each year ADFG estimates the number of participants for each of our summer fisheries, in order to determine whether or not to limit the fishery to a fixed number of days.

ADFG could estimate the number of trip limit participants based on the number of trollers who fished king salmon earlier in the summer, and by looking at the average number of participants in the coho fishery during the timeframe selected for trip limits. We fully anticipate ADFG would select a number on the high side, as they often do, to allow a margin of error.

### **Estimating Catch Rates**

Prior to the August troll king fishery, ADFG estimates how many fish are available to harvest and decides whether to manage the fishery open access, or to set a number of days. They do so using estimates of the number of boats fishing combined with indicators like CPUE in the July troll king fishery. Within a couple weeks of the August king fishery the department usually has a very good working estimate of the troller's annual treaty harvest. We are confident that they can come up with the timely estimate needed to calculate and prosecute a trip limit fishery.

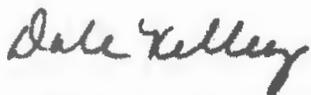
Given the small number of fish available for a trip limit, even if ADFG under-estimates the number of boats, the impact on the quota is likely to be minimal. For instance, if there were 10K fish to catch, and ADFG estimated that 1,000 boats would fish the opening, the limit would be just 10 fish per boat. If 1,100 boats actually fished and caught 10 fish each, the fleet would catch 1,000 more fish than anticipated. If the annual troll quota was 100K, the overage would only be 1%, which falls well within the normal range of management imprecision.

As noted above, ADFG regularly estimates catch rates before the summer troll king fisheries. The beauty of this proposal is that the catch rate is known - the number of fish remaining would be distributed equally amongst the estimated number of participants. We understand that ADFG would like to have as much data in hand as possible prior to re-opening a king fishery, and also appreciate the need to stay within the quota. Therefore, ATA supports waiting until September for a trip limit fishery.

Our managers do a fine job. However, management of highly mobile fish stocks is imprecise by nature and they occasionally miss the mark. This proposal has been submitted to address those times they fall under the troll quota. It is important for Alaska to harvest its entire treaty quota and trollers rely heavily on this species, which usually make up more than half of the value of the fleet's annual harvest.

Thanks for your service and consideration of ATA's point of view. Please don't hesitate to contact me during the meeting with any questions you may have.

Best regards,



Dale A. Kelley  
Executive Director