

## Proposal 176: clarified and amended

Chum Trollers Association (CTA)

**Proposal 176 - clarified**

Much of the opposition to Proposal 176 has arisen from an erroneous introductory summation provided by the board, which reads: "Establish new enhanced salmon allocations by gear type, as follows:". This statement is not correct. In fact, it is utterly contrary to our intent.

Proposal 176 emphatically does NOT wish to establish new enhanced salmon allocations. Proposal 176 seeks southeast region-wide compliance with the well-established allocation mandates as prescribed by 5 AAC 33.364 of the 1994 Southeast Enhanced Salmon Allocation Management Plan. Proposal 176 seeks to ensure that the enhanced salmon harvest is shared in a fair and reasonable manner by all gear groups as explicitly dictated by the allocation provisions mandated by 5 AAC 33.364 and that the regulation is enforced in a fair and reasonable manner for all gear groups.

In marked contrast with Proposal 175, with which 176 is often erroneously associated, Proposal 176 wishes to compel meaningful action from the Joint Regional Planning Team (JRPT) in a unified harvest management plan that will honor and fulfill the unanimously agreed-upon allocation target ranges of the 1994 Allocation Management Plan.

Also, we have incorporated well-meaning criticisms of Proposal 176 into its amended language. Although we felt that Proposal 176 was implicitly understood to be a region-wide plan encompassing all of southeast Alaska, this estimation was not shared by our colleagues. We have modified the language to make this point explicitly understood so that there may be no misunderstanding of our intent or any doubt that Proposal 176 conforms with the dictates of 5 AAC 33.364. We regret any confusion on this point, and we wish to thank our colleagues for their helpful critiques.

**Proposal 176 - amended**

We propose that the Board of Fisheries direct the Joint Regional Planning Team (JRPT) to develop a detailed harvest management plan that is region-wide, encompassing all of southeast Alaska. JRPT's plan will allocate fishing opportunity in all existing and future terminal harvest areas in a fair and reasonable manner for all gear groups. We anticipate that this harvest management plan would:

- 1) Be modified annually based upon the:
  - a. results of the previous year;
  - b. forecast returns of each species of enhanced salmon at each release site
  - c. expected prices
- 2) Include target harvest levels for each gear group for each species of significance by release site
- 3) Show a means by which half of the troll imbalance – currently 10% below trollers' targeted allocation range of 27-32% (based upon the 17% troll allocation share during the 2009-2013 period) – will be eliminated to make the troll share during the 2015-2019 period at least 22%, with the anticipation of eliminating the remaining imbalance in troller allocation in the following 5-year period.
- 4) Be submitted to the Board of Fisheries no later than the last board meeting of the 2016-17 cycle, with updates to follow annually.

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**What is the issue you would like the board to address and why?**

Trollers have never been within their targeted allocation range in any five-year rolling average since the inception of the 1994 Southeast Enhanced Salmon Allocation Management Plan (5 AAC 33.364). The allocation ranges for the respective gear groups were established to ensure a "fair and reasonable distribution of the harvest of salmon from enhancement projects among the seine, troll and gillnet fisheries." The actual harvest percentage for trollers has persistently fallen well short of the established fair and reasonable share of 27-32%, costing the troll fleet well over \$30 million in the span of a decade.

It is imperative that the JRPT take deliberate and meaningful action to craft a future harvest plan that closes the troll allocation imbalance over a reasonable period of time using the tools set forth in Board of Fish (board) Findings 94-148FB Guiding Principle No. 13.

What options might the respective boards exercise that they have not heretofore? In Findings 94-148FB, the Board of Fisheries agreed with the consensus recommendation of the State Allocation Task Force that when the value of a gear group's harvest over a trailing five-year period has been outside of its allotted distribution range for three consecutive years:

- 1) The first course of action is to make an adjustment to access terminal area fisheries in order to achieve the board-prescribed balance.
- 2) The second course of action to remedy an allocation imbalance under Board of Fisheries Findings 94-148FB is the additional production of enhanced salmon to benefit the gear group(s) below allocation.

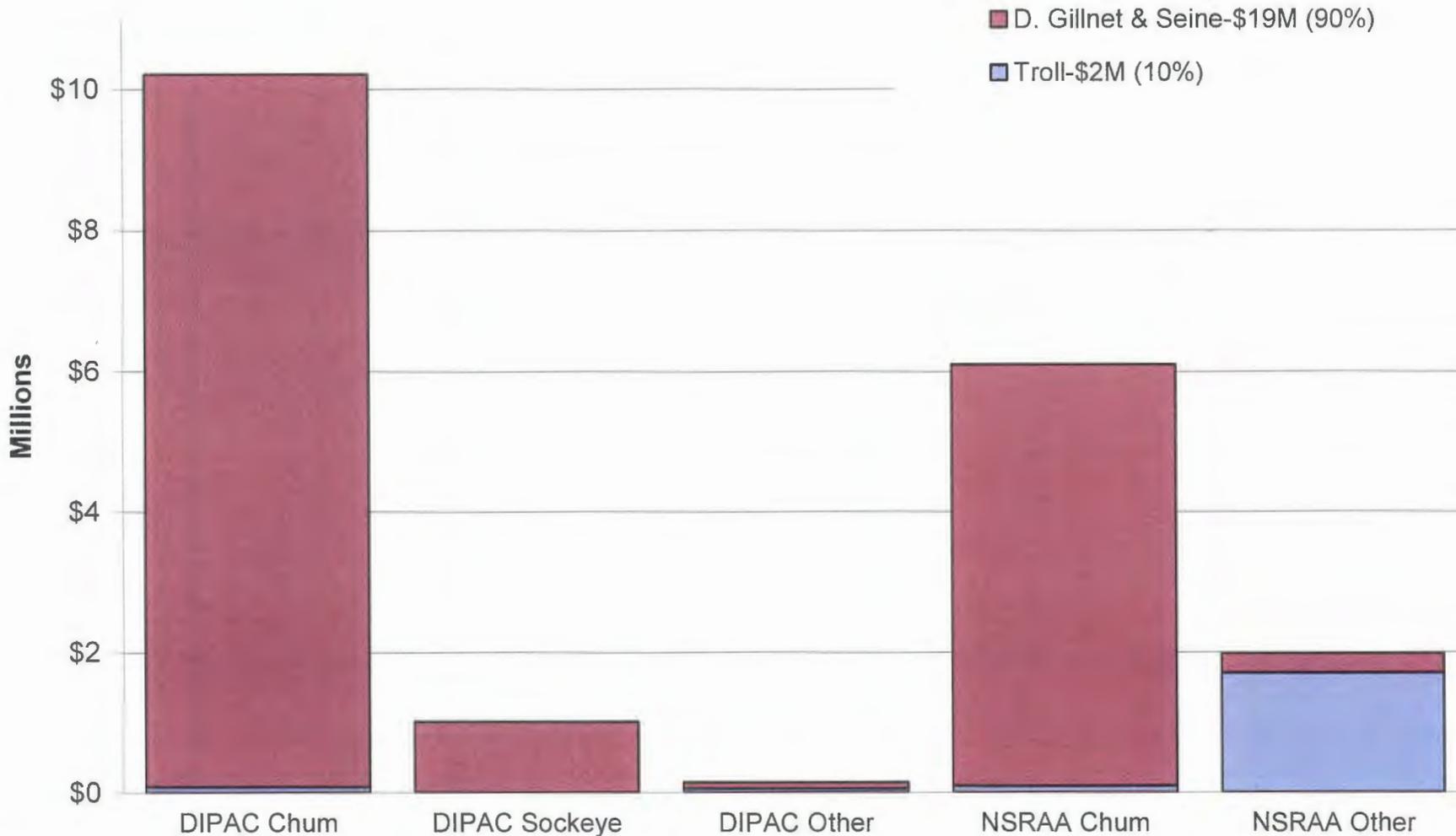
The SSRAA board works effectively to provide trollers with meaningful time and access to harvest enhanced salmon, and has demonstrated their commitment to allowing quality access to their chum salmon program. SSRAA's projects are shared effectively, and they are fully utilized by all gear groups. By contrast, NSRAA also creates and manages effective enhanced salmon projects (no one disputes this), however, the existing NSRAA board has failed, despite exhaustive efforts in the form of a litany of proposals submitted by trollers, to develop an equitable solution to share their enhanced chum salmon projects or to fully address the troll allocation imbalance, which cannot be redressed without a major chum salmon component. Trollers confront a long-standing and seemingly intractable impasse at the NSRAA board level, where the voting dynamic regarding sharing access to enhanced chum salmon is akin to our oft-repeated line: "It's like two wolves and a sheep voting on what's for dinner." But here's what we know: The creation and implementation of a well-balanced and fair harvest plan for all gear groups is possible at the individual board level, because SSRAA accomplishes it.

Also, in fairness to DIPAC, it must be noted that while the DIPAC board has been informally approached by troll representatives regarding gaining more meaningful time and access to DIPAC enhanced salmon, we have not heretofore done so officially. Proposal 176 seeks to do so now.

And lastly: We think it important to emphasize that trollers are not asking for special privileges in submitting Proposal 176. We are simply asking for our fair share of the time and access opportunities that the other gear groups presently enjoy, and moreover, our proposal seeks to protect whichever gear group (seine, gillnet or troll) that is out of its allocation in the future. We thank you for your time and consideration of our proposal.

## 2014 Distribution of Value: DIPAC & NSRAA

RC 35



Notes: Catch numbers from DIPAC and NSRAA fall board meeting books. Average weights and price from ADF&G "Est. Salmon Harvest by Area" SE AK and Yakutat Commerical Fish database on website; All seine info from "Hatchery Terminal Seine" except Hidden Falls seine chum reduced 20%.; DIPAC gillnet info from "Lynn Canal Gillnet"; NSRAA Gillnet info from "Hatchery Terminal Gillnet"; Troll king data from "Spring Troll"; Other troll data from "Summer Troll"

Revised chart. Original version erroneously overstated the value of net-caught NSRAA chum. Actual best-estimate of troll share of NSRAA and DIPAC salmon in 2014 is 10% rather than 9%. This is still far below the 27-32% allocation range.

2014-No of Fish	DIPAC Chum	DIPAC Sockeye	DIPAC King	DIPAC Coho	NSRAA DI Chum	NSRAA HF Chum	NSRAA King	NSRAA Coho
Gillnet	1505800	83300	550	4900	278138		3529	881
Seine	249100	1300	550	0	628561	252003	1874	2365
Troll	15200	0	200	4300	16722	4	6045	135092

DIPAC numbers from Table 4 Page 37 2014 December Board Book

NSRAA numbers from Fall Board Book (various pages)

2014-Ave Wt Lbs	DIPAC Chum	DIPAC Sockeye	DIPAC King	DIPAC Coho	NSRAA DI Chum	NSRAA HF Chum	NSRAA King	NSRAA Coho
Gillnet	9.4	6.6	10.6	8.8	9	9	13.9	9.4
Seine	8.6	5.5	13.7	8.8	8.6	8.6	13.7	8.8
Troll	9.2	5.2	12.6	6.3	9.2	9.2	12.6	6.3

2014-Ave \$/lb	DIPAC Chum	DIPAC Sockeye	DIPAC King	DIPAC Coho	NSRAA DI Chum	NSRAA HF Chum	NSRAA King	NSRAA Coho
Gillnet	\$0.62	\$1.82	\$3.11	\$1.16	\$0.60	\$0.48	\$3.50	\$1.09
Seine	\$0.63	\$1.72	\$2.90	\$0.83	\$0.63	\$0.50	\$2.90	\$0.83
Troll	\$0.62	\$1.49	\$5.45	\$1.52	\$0.62	\$0.50	\$5.45	\$1.52

All weights and prices from ADFG "Estimated Salmon Harvestby Area" SE and Yak. Com. Fisheries website

DIPAC gillnet weights and prices from "Lynn Canal Gillnet"; NSRAA gillnet data from "Hatchery Terminal Gillnet"

Seine weights and prices from "Hatchery Terminal Seine" except value HF chum reduced 20%

Troll King weights and prices from "Spring Troll"; other species from "Summer Troll"

2014-Total \$	DIPAC Chum	DIPAC Sockeye	DIPAC King	DIPAC Coho	NSRAA DI Chum	NSRAA HF Chum	NSRAA King	NSRAA Coho
Gillnet	\$8,775,802	\$1,000,600	\$18,131	\$50,019	\$1,501,945	\$0	\$171,686	\$9,027
Seine	\$1,349,624	\$12,298	\$21,852	\$0	\$3,405,543	\$1,092,282	\$74,454	\$17,274
Troll	\$86,701	\$0	\$13,734	\$41,177	\$95,382	\$18	\$415,110	\$1,293,641

NSRAA refers to the Chum Trollers Association as an "outlier".

Why do you suppose that is?

Is it because...

SEAS and USAG don't want to share the chums in their holds?

The fishermen on the NSRAA board are 2/3 SEAS and USAG.

SSRAA supported the JRPT, and the JRPT are 2/3 SEAS and USAG.

Which brings us back full circle to "two wolves and a sheep voting on what's for dinner".

ATA focuses on treaty kings and wild stock. They need the cooperation of the seiners to do so effectively at treaty.... and...

DIPAC did NOT oppose 176.

Isn't it interesting that the Sitka Advisory Committee, which has no affiliation with the hatchery boards, SUPPORTS 176.

Rather than the "traditional" king/coho trollers, perhaps NSRAA is referring to chum trollers as the "outlier"? But that would make the 480 trollers that delivered round chums in 2013 the "outlier", nearly half of the troll fleet. In fact, 340 trollers a year participated in the round chum fishery in the last 5-yr. rolling average. That certainly is not an "outlier" figure.

I can also add that proposal 176 received 19 letters of support. More support than any other proposal this board cycle.

NSRAA mentions that the king/coho "troll programs" represent 46% of its budget. But consider:

2013 NSRAA King Salmon Harvest  
 net groups 12,918  
 trollers 11,181

2014 NSRAA King Salmon Harvest  
 net groups 5,402  
 trollers 6,046

This is not an unusual sharing ratio.

As for chum salmon?

2013 NSRAA Chum Salmon Harvest  
 net groups 2,956,387  
 trollers 455,490

2014 NSRAA Chum Salmon Harvest  
 net groups 1,171,107  
 trollers. 16,726

Nor is this.

Furthermore, 65% of NSRAA's cost recovery was paid for by our "troll programs" in 2014.

rebuttal to NSRAA PC 49

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So, our expensive "troll programs" subsidize NSRAA's chum programs which trollers have a VERY unequal share in.

We appreciate NSRAA's public comments and criticisms and have modified our proposal accordingly.

We have amended 176.

It now asks the Board of Fisheries to direct the JRPT board to develop a detailed harvest management plan that is region-wide, encompassing all of southeast Alaska. (see RC 35)

SSRAA has demonstrated that troll allocation percentages can be met. Proposal 176 mandates that the JRPT develop a region-wide harvest management plan to provide meaningful, quality access to enhanced fish for all gear groups.

Linda Danner, Chairman  
Chum Trollers Association