January 9, 2018

Alaska Board of Fisheries
John Jensen, Chair
PO Box 115526
Juneau, AK 99801

RE: 2018 Southeast Stock of Concern Action Plan for Chilkat and King Salmon River Chinook

Dear Board of Fish Members,

Southeast Alaska Fishermen’s Alliance (SEFA) represents our 300+ members involved in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. Below are our preliminary comments on the stock of concern actions plans.

CHILKAT AND KING SALMON RIVER CHINOOK STOCK OF CONCERN ACTION PLAN

First we would like to point out that Under Action #2 Commercial Fishery page 19 it is stated that “the potential area restrictions in the District 11 commercial drift gillnet areas are designed to minimize the harvest of Taku River king salmon¹, which should also reduce the incidental harvest of King Salmon River king salmon.” So, we would request further clarification in the conditions for reducing management restrictions or delisting a Stock of Concern if the Taku River Chinook salmon show improvement but not necessarily the King Salmon River Stock would some of the restrictions listed in the plan in the upper Taku Inlet for both sport and commercial fisheries be able to be relaxed or would they have to be maintained if they are listed in the adopted action plan until the King Salmon River Stock of Concern meets the delisting criteria?

¹ Emphasis added
Southeast Alaska Fishermen's Alliance supports the adoption of Option A as a minimum starting point for all fisheries with some minor modifications. Our reasoning for picking these Options is if the stocks are not showing improvement we expect the Dept would choose further management restrictions as listed options B & C, thus giving the Dept. the most flexibility in determining management measures as appropriate for the expected pre-season forecast adjusted by in-season data. All options listed according to the ADF&G Stock of Concern document are able to be implemented by EO authority. The modifications we would suggest to actually be listed in the action plan are as follows: Sport fishing: add in an additional non-retention of king salmon in sections 15B and 15C from June 15 to June 30, and an annual limit of 3 king salmon ≥ 28 inches in length in Districts 15, District 12 north of Point Hepburn, and District 11. In Commercial Net Fisheries we would suggest adding in night time closures for the first two weeks in Districts 11 & 15C in addition to the 15A night closures. For the troll fishery we would refer you to the comments provided by the Alaska Trollers Association.

If conditions in Option B for the net fishery are considered, we would suggest amending "Do not open Section 11-C to drift gillnetting" to Do not open Section 11C to drift gillnetting until after August 1st (or close Section 11C to drift gillnetting through July 31st). Maintain the night closure bullet point in 11C to drift gillnetting to minimize interactions with inside rearing Chinook salmon.

In our comments on proposal (PC #149) we did not state that we opposed and believed the following proposals should have no action taken based on the Board developing and adopting a Chinook Stock of Concern action plan. Proposal #130, 131, 132, 133, and 134.

Thank you for this opportunity to allow us to comment on the action plan for the Southeast stocks of concern to be discussed at the upcoming meeting. SEAFA looks forward to an opportunity to participate in the committee of the whole on these action plans.

Sincerely,

[Signature]

Kathy Hansen
Executive Director