

RC 218

**Subject:** Why not Troll on July 1

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To: Sam Cotton, Commissioner of the Alaska Department of Fish and Game

Dear Commissioner Cotten,

The Department of Fish and Game has proposed to delay the July commercial king salmon troll opening until July 10. WHY?

ATA has responded to the Department's proposed late opening with a counter proposal of a July 6th opening date. The Department's stated purpose is to reduce any possible commercial harvest of king stocks from Southeast Alaska's systems that had weak returns in 2017. In lobbying for an early date ATA is attempting to claw back some portion of lost harvest opportunity. The proposed late opening does not seem to be supported by data. In addition the Department appears unconcerned that in most places sport harvest will be normally ongoing while trollers are closed. Again, a conservation double standard.

According to ADF&G's genetic studies 6% of the commercial king harvest in July are from weak local systems. This data also suggests that in August 9% of the commercial king harvest consists of these stocks. The Department makes the claim that the commercial harvest of these systems declines after July 10<sup>th</sup>. The problem with this theory is that (in modern times) commercial trollers don't (usually) fish kings in July after the 10<sup>th</sup>. Is ADF&G saying that commercial harvest of these stocks go down after the 10<sup>th</sup> because trollers aren't fishing kings in July after the 10<sup>th</sup>? The proposed late opening raises another question. If harvest of these stocks increases to 9% (3% higher) in August why open closer to August?

It is important that, in light of 2017's heroic and questionable management, trollers ask the Department before the Board of Fish meeting in January to:

- 1) Reexamine the argument for a delayed July king season. Provide the public a chance to examine the data on which the Department is basing a proposed later July opening as well as a credible explanation (backed by all available data) of any other management change that deviates from the Board of Fish management plan.
- 2) Explain what the Department's goals are in this and how the Department will measure success.
- 3) Credibly explain (with data) why, if there is risk to the concerned stocks in allowing a normal July 1<sup>st</sup> opening and a normal winter and spring season for commercial harvest, there isn't similar risk in allowing a normal (and continuing) January 1<sup>st</sup> opening for sport harvest.
- 4) Provide data to determine when and where the highest encounters of these stocks occur in the sport harvest as well as for other gear groups.

Yours  
Matt Donohoe