

- 1) The Department has stated that the downturn in the SEAK king salmon returns are not caused by harvest. I take this to mean that if harvest were curtailed entirely the weak returns would still be occurring. If the Board of Fish (BOF) thinks it necessary for the Draconian Cuts to the Troll fishery over wild stock downturns that Trollers are not the cause of why, under the Unuk River AP, are non-resident sport harvesters allowed the same bag and annual possession limits 10 miles up Western Behm Cannel that occurred in 2017? **Why is harvest of King Salmon even allowed anywhere in Western Behm Cannel?** It is hard for commercial fishermen to believe that this plan is not allocation: When the Troll king season is delayed until July 8th but sport fishermen are allowed to harvest kings in the fore waters of the Unuk River. When sport fishermen are allocated the hatchery kings commercials pay for but trollers are not allowed to harvest them except in THAs (where it's well know they can't get kings to bite). When sport fishermen are allowed ocean access to king salmon in May and June when Alaska Wilds and Alaska hatchery stocks are most available but Trollers have no access at all.
- 2) Under Guiding Principles I don't understand why three of the five Rivers covered (the Taku, Stikine, and the Situk) are even mentioned in an AP for the Chilkat and the Unuk Rivers.
- 3) Under the AP for the Chilkat and King Salmon Rivers what is meant by language at the end of the Troll section saying "Using EO authority, **close region wide spring troll fishery** from May 29 to June 14"? Does the BOF intend to close THAs during these two weeks?
- 4) **The single most harmful action in the AP, perhaps fatal in some cases, to troll processors and fishermen is the delayed July king opening.**
 - A) This requires processors to ice up the troll fleet 3 times in a 10 day period. In a normal season processors fill every available tote with ice and place them in the freezers. They do not have the capacity to produce what amounts to twice as much ice.

- B) Trollers will have to decide to make a choice to either fish coho on July 1st and risk not getting ice for the July 8th king opening or simply forgoing a week of coho fishing. This is a choice of which to make less money forced on trollers by the BOF and the Department.
- C) The quality of the ice will be inferior thus the quality of the product will be inferior.

- D) I have talked to the ice crew at Sea Foods Producers Co-Op (SPC) and they have told me that it is not possible to produce and hold enough ice under the delayed king opening scenario.
- E) Processors will lose the opportunity to get any fresh kings out for the Fourth of July Market which is the biggest barbecue weekend of the year. Fresh king salmon are at a premium on this market.
- F) Every boat in the fleet will know exactly where the king salmon are. Kings are more available in July than in August. It is probable that there will be no 2nd king opening with a delayed July opening.
- G) Some unscrupulous fishermen will take advantage of the delayed opening and keep kings early creating an overwhelming task for enforcement.
- H) Delaying the opening by a week disrupts the long chain of data provided by the consistent July 1st king opening. The foreknowledge of where king salmon are will also skewer CPUE data.
- I) Lastly the conservation benefits of a delayed opening are dubious. There is no modern data on stock make up later in July because, in recent years, the troll fleet has mostly not fished later in July. The data does suggest that Stocks of Concern (SOC) troll percentages go up in August (9% in August vs 6% on a July 1st opening). What will the Department do if a higher percentage of SOC are caught because of a delayed opening? What will the department do if the percentages are the same? Will the Troll fleet have to continue with these unnecessary and costly sacrifices?

Matthew Donohoe