



**Comments on Select Board of Fisheries
Proposals and RCs
January 20, 2018**

RC 266 Stocks of Concern Action Plans

1. Suggested replacement for 'Guiding Principles in implementing these action plans', (p.1):

Conservation Management of Southeast-Yakutat King Salmon

Elements of these king salmon stocks of concern action plans and selection of various inseason management measures will be formulated based upon preseason run forecasts for the Chilkat and Unuk Rivers and be evaluated relative to the established escapement goals for these stocks. Further changes to management measures will be based on inseason run assessment information as it becomes available.

Management actions will be similarly structured to assist Taku, Stikine, and Situk river king salmon achieve escapement. While these stocks are not listed as stocks of concern, they are also experiencing low returns. ADFG has indicated that very poor marine survival is the primary factor behind the recent downturn in the production of Alaska king salmon stocks.

The Board of Fisheries' intent is to provide ADFG the tools and flexibility necessary through the plans and other measures to: respond to additional information as it arises, implement the action plans, and act as necessary to rebuild poorly performing stocks and provide fishing opportunity where practicable.

Rationale: While ATA understands and supports the need for additional action to protect the Taku River and other stocks not listed as stocks of concern, we believe that the action plans should be specific to the listed stocks. ADFG already has emergency order authority to enhance conservation protection inseason for all other stocks, so those measures should be extracted and implemented under separate EO(s). We also recommend that language be retained in the plan regarding the fact that this is primarily a marine survival issue.

2. Chilkat-King Salmon Action Plan – TROLL

- ATA questions the need for a regionwide closure May 29-June 14 for the Chilkat River, since they are harvested mostly in the northern districts. Only a handful of tags have been found south of Petersburg (p.3).
- There is no mention of our THAs being open during the May 29-June 14 regionwide closure – will those opportunities to fish be available?

3. Unuk River Action Plan - TROLL

- There is no mention of the Neets Bay chum fishery in West Behm Canal. We note that anglers permitted to fish chum and release kings in the same area, which would work for chum trollers as well (p.5).
- **ATA opposes delay of the summer fishery to July 8 and asks that the Board of Fisheries include the language for the normal troll summer season per regulations found at 5 AAC 29.100 (p.6).**

Excerpts of the summer troll regulations (5 AAC 29.100):

- (1) the department shall manage the summer king salmon troll fishery
 - (A) to take 70 percent of the remaining king salmon harvest calculated as the annual troll harvest ceiling minus the winter and spring troll harvests of treaty king salmon in an initial opening beginning July 1; and
 - (B) to take the remaining portion of the king salmon harvest calculated as the annual harvest ceiling minus the winter, spring, and initial July 1 opening harvest of treaty king salmon;
 - (i) following the reopening of the king salmon troll fishery after any closure of a coho salmon troll fishery; or
 - (ii) if a closure is not necessary to achieve coho salmon harvest guidelines after the reopening of the king salmon troll fishery, no later than August 20, but only following a two-day closure to allow a fair start;

Negative Impacts of a July 8/Delayed Troll King Salmon Opening:

Data

- Little to no data exists to suggest what the stock composition will be later in the month.
- Taking fish in a different time frame would mean a loss of comparative data between years on the many stocks we harvest.

Coho

- The fleet would be given a two day 'fair start' closure before the king season opens, which will mean the loss of coho fishing time.
- The fleet can catch as much as 300,000 fish the first week in July, which will be very difficult to deal at the docks when people are also getting ready for a big king salmon opening.
- Defacto reallocation among the fleet. Freezer boats and some ice boats would probably forgo the opening, due to the logistical hassle and expense of having to clear their holds and quickly making the long run to king fishing grounds.

- Buildup of king salmon from limited winter and spring fishery could lead to increased incidental mortality, which is contrary to Board of Fisheries policy.
- Logistics. There would be a crush at the dock as many try to offload at once, to go king fishing. Many boats would have to be iced three times in 10 days, which would severely challenge the processing crews and ice capacity; ice quality could be poor or even non-existent in some areas.

Delisting Criteria

We question why there is no delisting criteria in the RC. Will the version listed in the original draft action plans be used? ATA asks that deliberations for removing stocks from the stock of concern list be conducted at the earliest meeting possible, regardless whether it is the Southeast-Yakutat region.

Habitat

As noted on p.4 of the Unuk River Action Plan, mine development in progress on the Unuk River watershed poses a future risk to fish health, water quality, and riparian habitat. The Chilkat River watershed is also slated for mine development. Page 8 at (6) of 5 AAC 39.2222 Sustainable Action Plan states, that: *[w]here actions needed to regulate human activities that affect salmon and salmon's habitat that are outside the authority of the department or the board, the department or board shall correspond with the relevant authority,* We ask that the Board of Fisheries monitor progress on Unuk and other Transboundary Rivers and comment, if/when appropriate.

Proposal 144

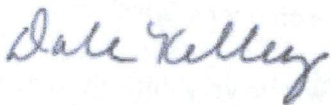
ATA has modified its position on **proposal 144** and wishes to be on record in support of the language change found in RC 260, regarding 5 AAC 33.376(b)(3). District 13: Deep Inlet Terminal Harvest Area Salmon Management Plan, which states that the commissioner **may** close waters in described areas during cost recovery period

Proposal 183

ATA supports line changes under development and in support of **proposal 183**, which seeks to modify commercial salmon fishing closed waters adjacent to the Situk River.

Thank you for considering ATA's point of view.

Best regards,



Dale Kelley
Executive Director