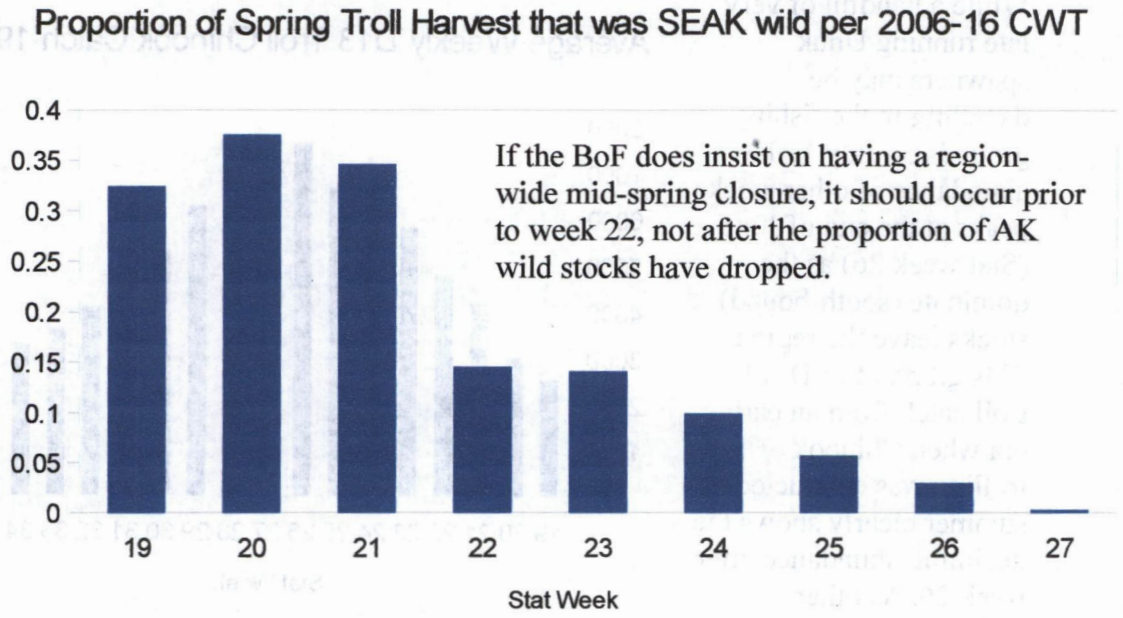
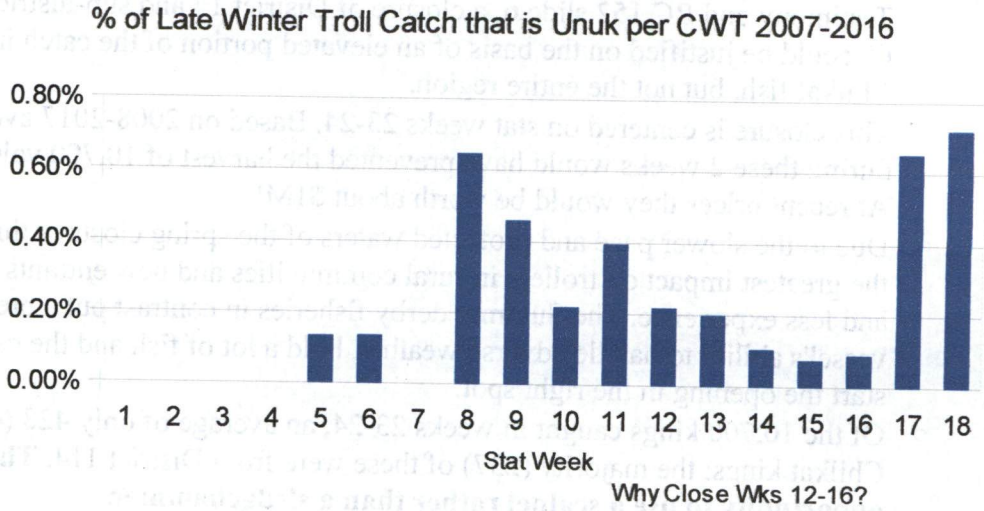
Tad Fujioka RC: Response to RC266 (Recommendations on Chinook Action Plans) RC 308

I would like the BoF to reconsider certain aspects of RC 266. In addition to referencing my PC 159 which discussed many of the aspects of RC 266 in detail, I would like to draw particular attention to:

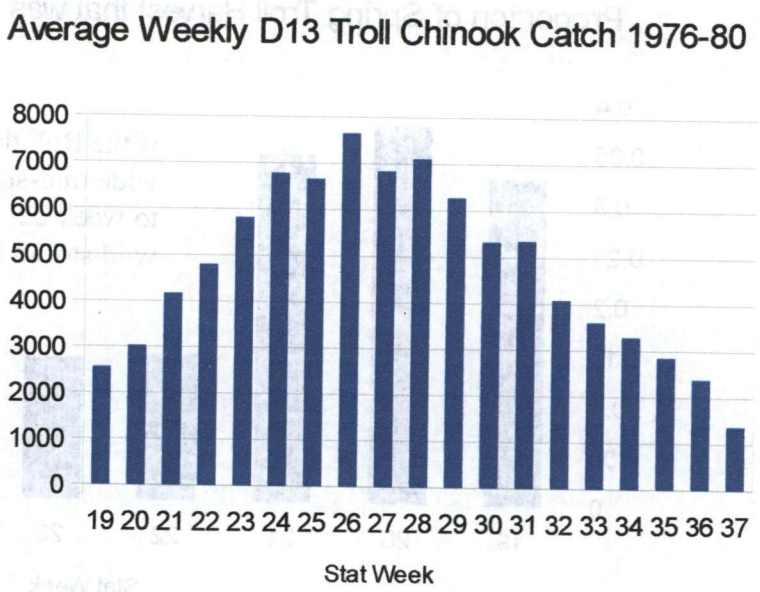
1) Chilkat Troll-Page 3: Region-wide closure May 29-June 14 should be limited to District 114 and adjacent subdistricts:
   - During the Troll Biologist's oral presentation on the Action Plans, it was stated that this region-wide closure was not necessary for the conservation of Chilkat Chinook and should not have been a part of the Option A at all. Recalling Tad Fujioka Personal Testimony and RC 152 slide 6, a closure of District 14 and sub-districts 113-95 and 112-65 could be justified on the basis of an elevated portion of the catch in these areas being Chilkat fish, but not the entire region.
   - This closure is centered on stat weeks 23-24. Based on 2008-2017 averages a closure during these 2 weeks would have prevented the harvest of 10,700 valuable spring kings. At recent prices they would be worth about $1M!
   - Due to the slower pace and protected waters of the spring closures this time of year have the greatest impact on trollers in rural communities and new entrants with smaller boats and less experience. The Summer derby fisheries in contrast put a premium on a larger vessel's ability to handle adverse weather, hold a lot of fish and the captain's ability to start the opening in the right spot.
   - Of the 10,700 kings caught in weeks 23-24, an average of only 428 (4/10th of 1%) were Chilkat kings; the majority (237) of these were from District 114. **This is an opportunity to use a scalpel rather than a sledgehammer.**
   - Even if the BoF was trying to protect other wild SE Chinooks besides the Chilkat, the timing of the closure is inefficient. More SE wilds and fewer other Chinook are historically caught in May than June.



2) Unuk Winter Troll Page 5: Early Closure March 15 should be delayed until mid April
   - While there are always a few resident Unuk Chinook in SE, their numbers are fairly stable through week 16, and the proportion of the total catch that they comprise begins to fall about the time of the proposed closure as other south-bound stocks become more abundant. Only after the outside-rearing segement of the Unuk fish return to SE does their abundance increase. This occurs around week 17 as this graphic from PC 159 shows.



3) Unuk Summer Troll Page 6: Delaying the summer Chinook opener until July 8 is unlikely to decrease the harvest of Unuk Chinook.
   - While a handful of very late running Unuk spawners may be dawdling in the fishing grounds on July 1, the abundance of other stocks peaks at the end of June (Stat week 26) as the dominate (south-bound) stocks leave the region This graph of of D113 troll catch from an earlier era when Chinook trolling was conducted all summer clearly shows the declining abundance after week 26. As other Chinook leave SE, the resident Unuk fish comprise a larger fraction of the remaining total and hence will likely comprise a larger proportion of the catch if the opening is delayed.



- While the delay is unlikely to reduce the harvest of Unuk stocks, it will however invalidate that year's catch data and make it incomparable to the historical record. (See page 13 of Deborah Lyons' PC45.) The CPUE in this fishery is typically used to confirm the (in)accuracies of other metrics of Chinook abundance, but won't be suitable for this purpose if the opening date is changed.
- If the BoF nonetheless elects to delay the July opener until the 8th, it will be **necessary to specifically allow for the Behm Canal chum troll fishery to begin earlier than this**. There should be no Chinook conservation issue as this fishery catches very few Chinook (recall personal testimony by Eric Jordan and deckhand Cathryn Klusmeir). As comparison, note that RC 266 not only allows sport fishermen to fish for chum in these waters, but even specifically allows directed Chinook fishing so long as the kings are released.

4) Unuk Sport-Remainder of Ketchikan-Page 6
   - The proposed non-resident annual limit of 3 fish from April 1-August 14 is equal to or more generous than the region-wide annual limit under the most-likely 2018 Abundance Index. If this area is intended to be part of a conservation plan, the annual limit should be less than the rest of SE; otherwise it is not a meaningful restriction.

For the record, I would like to add a correction to the table on page 2 of RC 250. It should be titled "Contribution of Unuk, **Keta** & Chickamin brood Chinook from Little Port Walter Hatchery in Oct-Dec Troll Fishery."

Tad Fujioka