

I urge the Alaska Board of Fisheries to reconsider its Unuk River Action Plan recommendations for the troll fishery summer troll (RC 266, pg 6, section 3). I have both practical and data collection related concerns with this section of the proposed plan.

Traditionally, the opening of the first chinook retention period for the summer season coincides with the beginning of coho retention on the outside waters of SE Alaska. The two fisheries are conducted in parallel, with trollers retaining both coho and chinook for the duration of the chinook retention period. As many as 300,000 coho can be harvested in the first week of July. As a practical matter, it will be a logistical impossibility for the bulk of the troll fleet to take advantage of even 1/2 of the 7 days prior to the proposed July 8th delayed chinook start date to target coho. This is partially because the department is required by regulation to have a 2 day fair start closure before the opening of the king salmon period, but primarily due to the inability of processors to offload fish and to provide ice fast enough to get the entire fleet turned around in time for a July 8 opener unless boats begin offloading and turning around well before the fair start closure. This is especially true following so closely on the heels of a region-wide coho opening date of July 1st, which would have already stretched the processors thin on ice production. This proposed delay in chinook retention will lead directly to a decrease in the fleet's ability to harvest coho salmon in the first week of July.

In addition to this, I would echo the statements found in on-time comments, PC45, page 13; in short, delaying the chinook start date may compromise the department's ability to use in-season CPUE data to verify the PST preseason AI by creating a break in continuity in the time series created by the long standing July 1 start date.

More broadly, I would also like to express concern with the inclusion of Taku, Stikine, and Situk in the guiding principles for the Chilkat, King Salmon and Unuk river action plans. I understand that this decision to include additional stocks is likely a fait accompli, but feel compelled to both register my disagreement with this decision and question how the decision to include these stocks will work in practice. The inclusion of these additional rivers sows confusion in the plan.

Thank you,

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