

## Ceri Malein: Comments on RC 266

**Sports**

To protect the Chilkat salmon most of Lynn Canal is closed for sports from April 15 to June 14 to the retention of king salmon. The Chilkat corridor (Lynn Canal) includes areas 100 miles from the River mouth.

**The principle applied to the Chilkat River Corridor should also be applied to the Unuk River Corridor.** Behm Canal should be closed to the retention of king salmon in its entirety to Camino Point to Pt Higgins. The west side of Gravina Island, a local Unuk River king salmon hot spot, should be closed in May and June as well. It is my belief that unless this is done there is little chance that the Unuk River Sport Fishing AP will have a positive effect on recovery of Unuk kings.

**RC 007**

**Table 2, pg. 15** demonstrates that **wild stocks** in the **Ketchikan area sports catch averages 29%** wild with a range of 40% - 17%.

2017 data is not available.

In 2016 wild stocks were 28% of the sport harvest.

In 2015 wild stocks were 24% and

In 2014 wild stocks were 40%.

**Table 10, pg. 16** Northern inside sport harvest averages 42% wild stocks.

**Table 12 pg. 18.** Outside fishing is different. The wild stock average here is 6%.

## **Concerning the Unuk River Troll portion of the AP in RC266**

### **Winter**

Closing winter trolling on March 15 will have a huge impact on trollers with little benefit for Unuk kings. According to CWT data trollers catch few Unuk kings until Week 17 and 18 (the last two weeks of April). According to the CWT data. In the Unuk AP I ask you to not close the winter troll fishery until April 15. If managers are concerned about Taku or Stikine fish the Department can manage troll effort with EOs.

### **Spring**

Trollers are chronically significantly below allocation of enhanced fish. In 2017 trollers were closed for what is most of the normal spring hatchery harvest further exasperating this imbalance. The intent of producing hatchery kings was to mitigate troll harvest reductions due to the Pacific Salmon Treaty. Commercial fishermen pay 3% of their gross income for aquaculture production. Sports pay ZERO.

I agree that hatchery fishing around the Ketchikan area should be curtailed. I do not agree that all of SEAK hatchery access areas need to be closed (apart from THA and waters of close proximities to hatcheries facilities). What does close proximities to hatchery waters mean). King salmon do not bite troll gear in terminal areas. This is the main reason trollers are so far behind in their enhancement allocation. Trollers will be unhappy tied to the dock while non-resident fishermen target on their hatchery fish.

### **Summer**

Open the fishery July 1 and use the language for managing the summer troll fishery found in **5AAC 29.100**.

Ceri Malein