

Good Morning BOF Members.

My name is Joe Baxter, owner/operator of the F/V Marilyn Dawn, SEAK Drift Gillnet permit holder.

I am writing in OPPOSITION of SEAK BOF Proposal 102, changing rotation schedule at Deep Inlet THA from 1:1 to 2:1 for Seine:Gillnet.

The Deep Inlet THA is unique for the gillnet fleet due to its great distance from any other open fishing areas. Unlike trollers and seiners who have numerous fishing areas adjacent to the Deep Inlet THA, most notably Crawfish Inlet and Sitka Sound, the nearest open area for gillnets is over one day's journey. Seiners and Trollers are able to fish Deep Inlet one day, then fish Crawfish inlet, Silver Bay, Sitka Sound or Chatham Strait the next. By contrast, it is impractical and/or unsafe for a gillnetter to travel between the Deep Inlet THA and any other fishing area on a consistent basis. As a result, gillnetters must choose to either fish Deep Inlet or fish somewhere else. In order for the Deep Inlet THA to be financially viable for the gillnet fleet, sufficient access is necessary to justify staying in Sitka and not participating in any other fishing openers.

I understand there are many nuances about how the allocation formula is applied to common property stocks, THA's, and traditional fishing areas targeting mixed stocks. I'm not an expert on the history or the application, but what I do know is that my access to fishing areas and time available to fish has steadily decreased over the past 12-years since I started gillnetting. Under the current conditions, I would not risk investing hundreds of thousands of dollars in a fishery that no longer provides REASONABLE access to attempt to catch fish. SOC restrictions have closed or curtailed fishing in every district and THA's have been reduced to the point where they are no longer a reasonable option for many due to unreasonable competition/competitiveness and a limited supply of fish. The Deep Inlet THA is only a viable fishery for the gillnet fleet under a 1:1 or better rotation.

My understanding is that the sponsor of this proposal believes it is necessary because the gillnet fleet over harvested chum salmon by a couple percentages based on the cumulative 5-year rolling average. While this may be technically correct, it is only one aspect of the overall management of Southeast Alaska's salmon fisheries. The reality is that all gear types have been seriously impacted by SOC restrictions that significantly restrict or prevent permit holders from fishing in the traditional patterns that provided for the original allocation formula. Changes to existing rotation schedules should give appropriate weight to these new realities and how they will impact the overall viability of this particular THA.

Limiting gillnetters to only 2-days a week in Deep Inlet is not enough fishing opportunity to justify the expense and time to travel to and from the THA. Unless other fishing areas are made available to the gillnet fleet within a reasonable distance, such as in the Crawfish Inlet THA, this proposal will likely result in a significant reduction in gillnet participation in the Deep Inlet THA. This will correspond with increased congestion, competition, and risk taking in the remaining fishing areas. I ask the Board to please consider the net impact that the loss of even one fishing day will have on this unique THA, and vote to maintain the status quo of 1:1.

Thank you for considering my comments.

Joe Baxter,  
F/V Marilyn Dawn

