

to: ADFG Board of Fish

re: Opposition to Proposal 223

Dear Chair Kluberton and members of the Board of Fish,

I present the following perspective on the arguments given in favor of proposal 223 by the author and in RC 47. Thank you for your consideration of these comments.

Respectfully,

Joel Kawahara

Item 1 and 4, Value and Economics arguments

RC 47 presents a lengthy argument for the economics improvement provided by the proposal. The data presented was provided by ADFG and is presumed to be accurate. The data presented does not represent all districts where chinook are open in Southeast Alaska during the July and August chinook openings. The southern, central and northern inside districts are not analyzed.

A discussion of the trade-offs a troller must weigh to decide what to do when chinook open in August is important to understanding why the economics argument as presented is not fair to the entire troll fleet. The trade-offs segregate into those for ice boats and freezer boats.

For ice boats, the price differential between chinook and coho as well as the possible number of each species harvested determines the income from the August Chinook opening. The relative value of a chinook is roughly 5 times that of a coho. However, coho catches can be more than 5 times greater than chinook catches in some portions of the inside districts during the August chinook openings. Ice boats can include smaller vessels and weather becomes a major issue in determining what a troller will do. Ice boats includes all hand trollers which are almost universally small and weather as well as logistics is highly restrictive to these vessels. Because of these factors, generally the smaller boats will go to inside waters and concentrate on coho and just hope a few chinook are encountered during the August chinook opening.

Discussions I have had with guys who fish inside during August indicate that chinook tend to be "feeders", small, barely legal sized fish. The August harvest of chinook in inside districts is numerically less than, and they weigh less than those harvested in outside districts. Because of the above factors, boats that fish the inside during the August chinook opening benefit less than those fishing outside.

Freezer boats face different trade-offs. Because freezer boats are among the largest in the troll fleet, they are less deterred by weather than the rest of the fleet. The biggest challenge freezer boats face is logistics. Because frozen fish warrant specialized handling to off-load, and this takes time - about 3 days, freezer boats prefer to off-load only when they are close to full.

The August chinook opening is typically shorter than the July opening and because it is by regulation only 30% of the summer quota, the number of chinook any vessel harvests is typically less than in July. For a freezer boat the logistics trade off is freezing the August chinook opening or just not retaining chinook and gaining 3 days of coho fishing. Note that coho harvest rates can be between 100 and 200 per day in August and coho are worth about \$20 per fish. These trade-offs mean that freezer trollers can decide to not retain chinook and forego any economic benefit. Even with a larger proportion of the chinook harvest occurring in August, freezer boats may chose to forgo the chinook harvest should coho fishing be going very well. Thus a freezer boat may both lose 10% of the chinook quota from the July opening and have end up forgoing the August opening because the economics of coho out weigh chinook harvest.

The portion of the fleet that actually might benefit from from the proposal are the larger ice boats who fish the outside waters during the August chinook opening. These are the boats that are already benefitting from the troll fishery more than small inside boats. It is my opinion that this is not what the author had in mind. This is not a wider distribution of economic benefit through the troll fleet.

Item 2, Higher Quality product

The quality of the harvest is determined by many factors including the handling on board the vessel, length of time before a fish is processed and frozen, the ocean age of a fish, and to some extent the market value of larger fish is due to higher fat content. The author of the proposal does not indicate which of these would be improved by the proposal.

To some extent, mature chinook have the firmest flesh texture and the highest fat content of all chinook. There will be a higher incidence of mature chinook in August than in July, so these fish will be higher quality. There is the possibility of small feeder chinook being landed as described in item 1 above. These will be of lower quality in fat content and firmness. Although the majority of the fish landed will be mature, the processor will still have to find a buyer for the small fish which can be a problem unless the price is low.

There is no way of knowing what the trip length of the August opening will be. Ice boats dread the 6 day opening because every boat will fish the full 6 days and sit and wait in town for 2 days to off-load. Salmon are normally delivered within 5 days on an ice boat. With more quota reserved for the August opening, there is increased possibility of the chinook retention period being 5 or 6 days instead of 3 or 4. In my opinion, there is no way of knowing if there will be better, the same, or less quality salmon delivered as a result of this proposal.

Item 3 Incidental mortality

As I recall the discussions during the Chinook Task Force, Chinook Non Retention (CNR) days were extremely important. The charge from the Board of Fish to the Chinook Task Force was to have a minimum of ten days of chinook retention with desired number of 20 days. Additionally, a troll closure of areas of high chinook abundance after the first Chinook opening of the summer

was agreed to. This was an effort to avoid losing any more days of summer time fishing to reduce chinook mortality.

By way of context, the Southeast Alaska troll season went from a year round fishery with a highly diverse fleet, including professional hand trollers to chinook retention periods as short as 3.5 days. The general season opening was delayed from April 15 to June to the current July 1. By delaying to July 1, the troll fleet lost 15 days of coho retention and attendant income. All of these decisions were made to reduce CNR days.

The intent of the current apportionment of the summer chinook troll quota was to achieve the charge of the Board of Fish and draft a plan that would provide for a minimum of 10 days of chinook retention. By reducing the abundance of the chinook in the July opening, and closing the areas of high chinook abundance, the encounter rate of chinook while trollers fished for coho was to be reduced as much as possible.

In addition, the seine fleet had concerns about chinook abundance in district 104. The areas of high chinook abundance did not extend to district 104 because this is a traditional seine fishing area. The seiners wanted the trollers to reduce the abundance of chinook by catching as much of their quota as they could while also achieving the Board of Fish charge of a minimum of 10 days chinook retention. This would lower seine encounters with chinook.

The author of proposal 223 claims that the proposal will reduce chinook incidental mortality. There is no data or analysis to support this claim. It is likely that the higher abundance of chinook after the July opening would increase encounter rates during coho trolling. This would increase the incidental mortality, contrary to the claims of the author.

Item 4 Distribution of chinook

It is important to understand how many compromises were made during the Chinook Task Force discussions to come to an agreement within the fleet to distribute access to chinook. These include:

- The winter chinook quota was set at 45,000 landed catch with hatchery exclusion. The compromise was to NOT have the winter quota vary with the Abundance Index. The long term average winter harvest prior to 1993 was about 25,000 chinook. This was a significant distribution of chinook out of the summer fleet, when the majority of the southern fleet participates in the troll fishery.
- Because of historic seasonal distribution of chinook, it was believed that the southern outside trollers would suffer a loss of access as the opening was moved to July 1. The 70% was intended to provide as much access to chinook for the southern outside fleet as early as possible in the summer before the chinook became less available in that district. 60% in July would disrupt a regional agreement between trollers.
- It was agreed that a portion of the chinook quota would be used to access Alaska hatchery chinook production. This distributes chinook to the inside fleet and affords that portion of the fleet a more traditional fishing (spring) fishing period.

Although these compromises were made over 20 years ago, it is my contention that the fleet dynamics and general economics of trolling have not changed sufficiently to warrant ANY change to the chinook management plan.

My most urgent reason to not adopt this proposal is that it undermines the work of the Chinook Task Force. The fleet bled gallons of blood and spent untold hours discussing the options for the chinook management plan. The discussions went on for all of 1993 and resulted in the current chinook management plan. Hundreds of trollers were present at the 1994 Board of Fish meeting where the findings of the Chinook Task Force were adopted. With due respect to the current Board of Fish, I find it unreasonable to expect this Board of Fish to understand the fine tuning of the existing chinook management plan and make adjustments that preserve the network of compromises. In addition, even though everyone is supposed to be paying attention to the Board of Fish process, in spite of the efforts of the Alaska Trollers Association it is highly likely that very few trollers were aware of this proposal and the Board does not have a widely considered opinion from the troll fleet. I believe the Board of Fish should not adopt proposal 223.

Item 5 In Season Management

The issue of in season management in the August chinook opening is addressed by proposal 224. Because proposal 224 allows ADFG to re-open the chinook fishery with limited numbers of chinook and does so at any Abundance Index, I argue that 224 provides more flexibility to ADFG than the provisions of 223 for management of chinook harvest in August and September.

The department currently has Emergency Order authority to close the fishery when they need to conserve chinook stocks - in this case to not exceed the quotas. The information ADFG uses to determine when to close a fishery includes early deliveries from which they derive an estimated CPU, weather, and some call in information from the fleet. This is available regardless of the Abundance Index and ADFG does a good job of managing the fishery with these tools.
