

RC10

**Tad Fujloka RC Re: BoF vs PSC Treaty Team Responsibilities****Alaska Dept of Fish and Game****Boards Support Section****PO Box 115526****Juneau, AK 99811-5526**

Feb 27, 2018

**Members of the Board of Fisheries:**

I want to encourage the BoF to clearly and publicly delineate the areas of jurisdiction of Alaska's Pacific Salmon Treaty (PST) team in comparison to the BoF with respect to SE Chinook fisheries. The treaty team's responsibility should be limited to negotiating a quota of "treaty" Chinook leaving the BoF with the responsibility to allocate that quota among the various fisheries. Specifically, Alaska's treaty Commissioner to the Pacific Salmon Treaty should not be making internal reallocation decisions that override regulations previously implemented by the BoF.

The 2017 cancellation of the August Chinook troll fishery which was implemented by Alaska's PST Commissioner is a prime example of such an action. Commissioner Swanton tried to disguise the allocative nature of his actions in his Aug 7, 2017 press release which states that:

Although it is a very difficult decision to make, retention of Chinook salmon will cease at 12:01am, Thursday, August 10, 2017, in the Southeast Alaska recreational and commercial fisheries and non-retention will continue through September.

In practice however, the timing of the closure immediately before the August troll Chinook opener, meant that nearly all of the forfeited fish came from the troll allocation. By Aug. 10, around 95% of the annual sport Chinook harvest has already occurred (See Figure 8 page 30 *Overview of the Sport Fisheries for King Salmon in SEAK through 2017: A Report to the AK BoF*, Special Pub. 17-15 which was Tab 9 of RC 3 at the recent SE BoF mtg in Sitka.) and despite the wording of the News Release, Chinook retention continued to be allowed in commercial net fisheries. The troll fleet meanwhile was kept from harvesting 30,000 treaty Chinook worth over \$2.5M ex-vessel. This had serious economic repercussions throughout SE. The cancellation was a major factor contributing to the operating loss of the Seafood Producers Cooperative -- which hurt member/owners throughout the region.

**The notion that the August closure was necessary for conservation of SE wild stocks should be immediately dismissed. The August troll fishery occurs far too late in the year to have any effect on the Chinook escapement for that year. The catch in the August troll fishery is comprised primarily of fish returning to the southern US and British Columbia (See below Fig 8 from page 35 of *Mixed Stock Analysis of Chinook Salmon Harvested in SEAK Commercial Troll and Sport Fisheries, 2016 FDS No. 18-01*). Note that the handful of Andrew Creek and Southern Southeast AK Chinook caught in the August 2016 troll fishery were immature fish- primarily from SE hatcheries.**

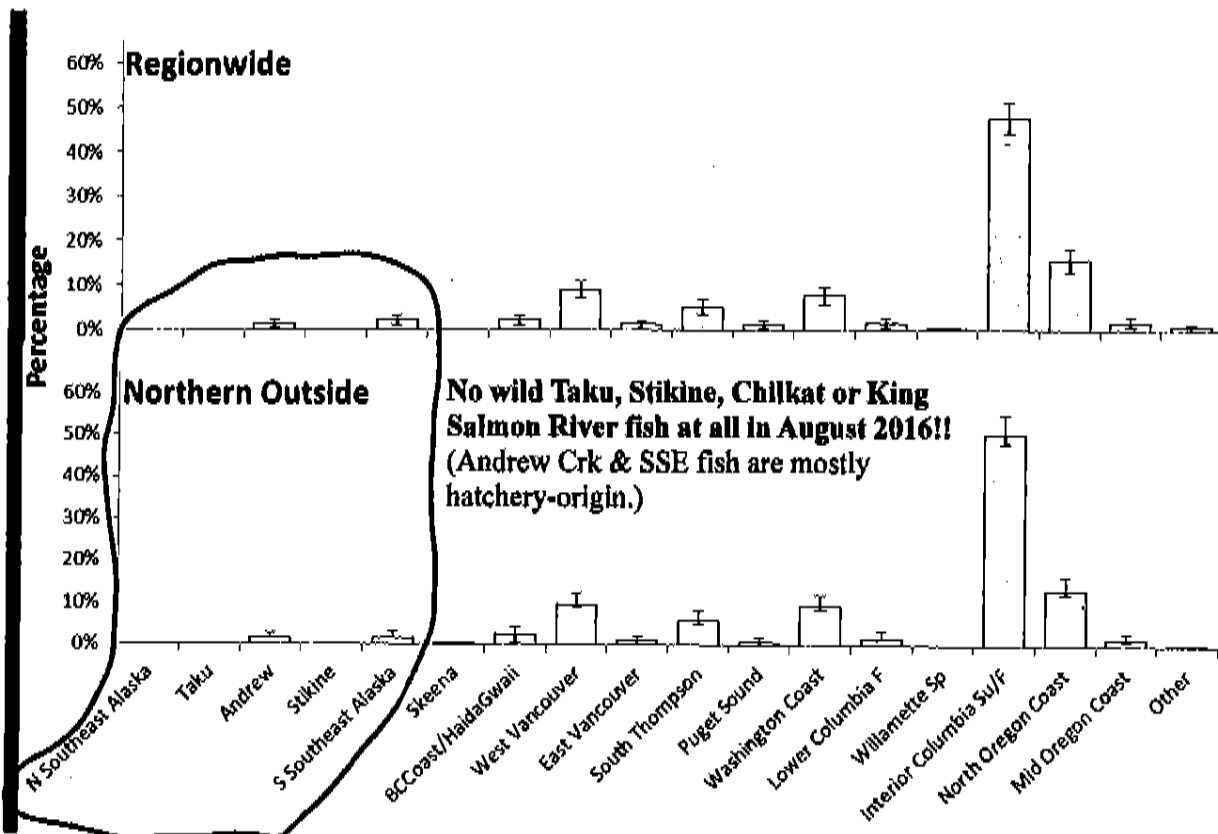


Figure 8.—Estimated contributions and 90% credibility intervals of fine-scale reporting groups of Chinook salmon to the regionwide (upper) and Northern Outside quadrant (lower) second retention period of the summer troll fishery harvest in Southeast Alaska, AY 2016.

*Note:* Reporting groups are described in Table 1. The *Other* group consists of those reporting groups that do not contribute more than 5% in any seasonal fisheries. This group includes the *Situk, Alek, Nass, Fraser, Lower Thompson, North Thompson, West Cascades Sp, Columbia Sp,* and *S Oregon/California* reporting groups.

**In summary, please protect your allocative authority and let department staff specifically know that the highly allocative and utterly ineffective 2017 August closure is not to be repeated.**

Thank you,

Tad Fujioka, FV Merlin