

## **Alaska Trollers Association**

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**RC43**

January 17, 2019

To: Board of Fisheries

Re: Proposal 176 – Southeast Alaska King Salmon Management Plan

Gentlemen,

As you know, the Alaska Trollers Association represents the Southeast commercial troll fleet. Our members are professional hook and line salmon fishermen. The troll fleet is one of the largest salmon fleets in the state and is 85% resident. A large number of troll permit holders live in rural communities. ATA has been in existence 94 years reflecting the longstanding history of our fishery.

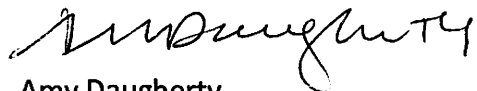
Proposal 176 as written changes the existing SE Sport King Salmon Management Plan in several fundamental ways:

- (a) changes the pre-season indicator from the computer model-driven Abundance Index (AI) to the Catch-per-unit-effort in the winter troll fishery. We SUPPORT this change.
- (b) explicitly states the sportfish harvest limit for each abundance tier. We SUPPORT this change.
- (c) alters the mix of regulatory actions that are utilized at each tier to achieve the harvest limit. We are CONCERNED that the new un-tested restrictions may result in significant management error thus causing the harvest to exceed harvest limit. We ask that BoF to authorize and direct the department to modify the planned restrictions whenever it proves necessary to achieve the harvest limit.

Our concern in item c) stems from a provision in the latest treaty agreement that imposes a penalty on Alaska's share of the Chinook in the following year if Alaska's all-gear harvest exceeds our all-gear quota. Under the current management, the commercial troll fleet would be required to pay 80% of any subsequent penalty triggered by an over-harvest in the sport sector. We can accept responsibility for penalties triggered by our own overages, but detest the notion that we should have to suffer for another fleet's profits.

For this reason we STRONGLY OPPOSE the no-action alternative advanced by SEAGO in PC 27 and supported by several of their members. The CPUE in 2018 winter fishery is equivalent to an AI of about 1.12 and provides for a sport quota of 25,800. The sport harvest of treaty Chinook has far exceeded this number every year (that the sport harvest has been officially calculated) since 1999! Even in 2008 when the preseason AI was only 1.07, the sport harvest was over 32,600. The new treaty agreement slashes Alaska's all-gear allowable catch and the troll fleet will suffer the brunt of that. On top of this injustice, it would add insult to injury to require us to also pick up 80% of the penalty triggered by the sport overages that no-action would surely result in.

Sincerely,



Amy Daugherty  
Executive Director