



Alaska Trollers Association

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Chairman Eric Olson
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, AK 99501-2252

Dear Chairman Olson and Council Members:

I am writing on behalf of the Alaska Trollers Association (ATA) in support of the Council's preliminary preferred alternative to address Chinook bycatch in the Gulf of Alaska (GOA), which provides the tools to limit Chinook bycatch; identify stock composition and run timing of Chinook stocks present in the GOA; and, creates an incentive for trawlers and the agencies to find new ways to avoid Chinook stocks and reduce salmon bycatch.

ATA represents the interests of hook and line fishermen in Southeast Alaska who target Chinook, coho, and chum salmon. Much of the fleet also relies on halibut from areas 2C and 3A. With over 2,500 hand and power troll permits, trolling ranks among the largest fisheries in the state. Our fleet has a residency rate of 85% and trollers make up the majority of permit holders in nearly all Southeast Alaska communities. Roughly one of every 35 people in Southeast works on the back deck of a troll boat. When you add in gillnetters, seiners, anglers, guides, and subsistence users -- in addition to the processing and support sectors -- it quickly becomes apparent that healthy salmon runs are crucial to the economic and social well-being of our region and the state.

The Environmental Assessment broadly estimates the ex-vessel price of Chinook salmon to the state's commercial fisheries, but such averages mute the significance of this species to the troll industry. Chinook is one of our fleet's three target species and is far and away the most valuable. In 2006, trollers were paid roughly \$32 million ex-vessel, which was over 10% of the entire statewide salmon value; Alaska's general fund received an injection of nearly \$1 million in fisheries business tax revenue from the troll fishery alone. Chinook made up half of the fleet's earnings that year.

From 2009 to 2010 Chinook bycatch increased over 500% in the GOA. Our members believe it is essential that all efforts be made to expedite implementation of a hard cap and other measures to control bycatch. A cap of 22,500, based on an average that leaves out the highest years, seems reasonable and should help avoid the spikes in bycatch that concern fishermen who target Chinook salmon.

We appreciate that the Council thought to provide in the preferred alternative appropriate caps for any mid-year implementation of the rule. This should achieve the twin goals of controlling bycatch as soon as practicable and providing reasonable opportunities for GOA trawl fisheries. This type of planning is particularly important given ongoing sacrifices being made by salmon fishermen from California to Alaska, to conserve salmon that are broadly dispersed along the Pacific Coast as far north and west as the Bering Sea.

Since the mid-70s, Southeast Alaska fishermen have endured significant conservation restrictions to rebuild Chinook salmon from Alaska, British Columbia, and the Lower 48. The Pacific Salmon Treaty Chinook quota in Alaska still remains extremely low, contrary to promises made to the fleet that the treaty rebuilding program, combined with a fishermen's financed hatchery program, would restore harvest to more than 500,000 by year 2000. In 2010, and despite the fact that stocks are considered rebuilt in our fishery, the Southeast quota was the 7th lowest since Treaty signing and, at 221,800, was more than 40K less than the original Treaty rebuilding

quota. The impact of low quotas in our region has been significant economic disruption of the troll fishery and unnecessary tension and allocation disputes amongst fishermen. This year the Southeast quota is up, but still far below where it should be.

Directed troll and gillnet fisheries for Taku and Stikine River Chinook will remain closed in 2011. Fortunately, those stocks are expected to achieve escapement, but the returns are projected to be too low to provide harvestable surpluses. These stocks return to spawn in the spring and are likely present in the North Pacific trawl fisheries.

Chinook in several other GOA areas are not meeting escapement objectives. For several years, directed salmon fisheries have experienced dismal landings and early closures, causing ADFG to identify the Karluk River Chinook as a stock of concern (ADFG memo to Alaska Board of Fisheries, 9/30/2010). These stocks are likely to pass through GOA trawl fisheries at various stages of their lifecycle.

The salmon stock identification studies envisioned under the proposed alternative should help to provide essential data on Chinook stock composition and run timing, which will help to better define the impacts of trawl bycatch on various stocks and salmon fisheries. It should also help improve trawl management, by providing the information necessary to craft practical options to help trawlers avoid Chinook salmon.

ATA strongly supports expanding observer coverage to smaller trawl vessels and improving sampling methodology and protocols onboard and at the dock. In fact, since salmon are known to be milling in the area, many of our members question a sampling rate of just 30% in the GOA. Salmon are important not only to Alaskan fishermen and processors, but also many other West Coast communities; consumers across the nation and world; and the general public, which has gone to great lengths and expense to conserve them. It does not seem unreasonable to get a more accurate handle on the impact of trawl bycatch and to develop the means to better control it.

ATA has long endorsed cooperative efforts between agencies and fishermen to develop and refine conservation based fishing strategies. Expanding mandatory information gathering, combined with a hard cap, will give some assurance to fleets like ours that Chinook bycatch will be dealt with in a meaningful way. Providing that assurance through reasonable incentives and accountability standards, versus draconian restrictions that may not address the problem, will allow the trawl fleet some flexibility to find creative solutions to salmon bycatch.

In conclusion, ATA believes that a good long-term plan to reduce salmon bycatch can be developed. In the interim, we ask that emergency regulations be promulgated as soon as practicable. Additionally, relevant research and analyses should be initiated and/or expanded, to help answer the many outstanding questions about the nature of GOA trawl bycatch and what avenues exist to control and reduce it. We believe the Council's preferred alternative goes a long way towards accomplishing those goals. We encourage you to vote in support and forward the preferred alternative to the Secretary posthaste.

Thanks for your participation in the Council process. ATA appreciates your dedication and service to the nation's fisheries resources and fish dependent communities. If we can provide additional information, or otherwise be of assistance on this or other issues, please feel free to contact me.

Best regards,

Dale Kelley
Executive Director