



Alaska Trollers Association

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Mr. Eric Olson, Chair
North Pacific Fishery Management Council
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RE: Agenda Item C4 - Final Action GOA Chinook Salmon Bycatch Agenda Item C5 - GOA Trawl Bycatch Management

Dear Chairman Olson and Members of the Council:

I am writing on behalf of the Alaska Trollers Association (ATA) regarding Chinook PSC limits and management of non-pollock trawl fisheries operating in the Gulf of Alaska (GOA). Controlling salmon bycatch in the trawl fisheries is particularly important given ongoing sacrifices being made by salmon fishermen from California to Alaska. To that end, **ATA supports instituting a hard cap for Chinook salmon taken in the non-pollock GOA trawl fisheries.**

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. The troll fleet is one of the largest in the state and is 85% resident; 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. Trollers are highly reliant on Chinook salmon. Annual exvessel value of troll caught Chinook has exceeded \$32 million and 10% of the entire statewide salmon value. Alaska's general fund and communities receive between \$800K - \$1 million in fisheries business tax revenue from the troll industry each year. Chinook salmon usually comprise about half of the fleet's annual earnings.

From 2009 to 2010 Chinook bycatch in the GOA trawl fishery increased over 500% and our members expressed concern. In response, ATA called on the Council to expedite the implementation of hard caps and other measures to control trawl bycatch. Guiding our comments were the twin goals of controlling bycatch and providing reasonable fishing opportunity for GOA trawlers. The current cap on the GOA pollock fishery was a good first step and should help trawlers avoid the spikes in bycatch that have long concerned salmon

fishermen who target Chinook. It is appropriate to now develop a similar measure for the non-pollock trawl fisheries.

As the current data reveals, many of the tagged Chinook picked up in the trawl fishery come from a variety of jurisdictions that are governed by the Pacific Salmon Treaty (Treaty). Of the Alaska stocks, 75% appear to come from river systems in Southeast.

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 Treaty Chinook quota in Alaska still remains extremely low, contrary to promises made to trollers that the treaty rebuilding program, combined with a fishermen's financed hatchery program, would restore harvest to more than 500,000 fish by year 2000. This has not happened.

In 2010, when the Council first began the GOA trawl bycatch discussion in earnest, the Southeast Chinook quota was the 7th lowest since Treaty signing (1985) and more than 40K fish less than the original Treaty *rebuilding* quota of 263K. The 2013 season started on a grim note. For the third year, there will be no directed harvest of Chinook salmon from the Transboundary Rivers (Stikine and Taku). This will harm fishermen from Southeast Alaska and British Columbia. In addition, the 2013 all-gear Chinook quota for Southeast is just 176,000 fish –a decrease of nearly 91,000 from 2012, and the 4th lowest Treaty quota ever.

The impact of chronic low quotas in our region has been economic disruption of the troll fishery and unnecessary tension and allocation disputes amongst fishermen. This has been exacerbated by deep reductions in 2C halibut quotas.

Chinook in several other GOA areas are also struggling. For several years, directed salmon fisheries have seen dismal landings and early closures, causing ADFG to identify the Karluk River Chinook as a stock of concern. These stocks are likely to pass through GOA trawl fisheries at various stages of their lifecycle. Closure of the set net fisheries in Cook Inlet last year made big headlines and high stress during the Board of Fisheries and recent legislative session. The AYK fisheries have seen dramatic closures, though to what extent GOA trawlers harvest those stocks is not yet clear. The state and ADFG are putting significant resources into identifying the cause of these problems, along with possible solutions.

The genetic stock identification studies that are underway should help to provide essential data on Chinook salmon stock composition and run timing in the GOA, 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. At this point, these data sets are rather thin and there is much yet to learn.

Troll representatives understand West Coast Chinook salmon better than most. We are used to looking at data runs similar to those presented in the Environmental Assessment (EA). Unfortunately, our limited knowledge of how the trawl fishery is conducted across the range of vessel types, areas, and seasons - coupled with a wide array of information and

options presented in the EA - make it difficult to endorse a specific cap. A Preliminary Preferred Alternative, with more specific and/or streamlined analyses would have been helpful. For now, **ATA supports a hard cap and trusts that the Council will work with the interests at the June meeting to determine the appropriate level.**

Why is full retention for unobserved vessels being considered 'Alternative 3', as opposed to a requirement within alternatives? **ATA supports full retention of salmon bycatch for unobserved vessels, regardless which alternative is ultimately adopted.** Hopefully NMFS would find some way to make use of this biological data, even if the issues raised in the EA necessitate the ongoing use of current methodology to estimate bycatch rates.

Finally, how will any of the proposed alternatives articulate with the *GOA Trawl Bycatch Management Program* that the Council is developing? Hopefully the hard cap option selected will provide a starting point for the new management plan.

ATA has long endorsed cooperative efforts between agencies and fishermen to develop and refine conservation based fishing strategies. Developing an appropriate hard cap and following up with other PSC management measures, through the GOA Trawl Bycatch Management Program, will provide assurance to salmon fishermen that Chinook bycatch will be dealt with in a meaningful way. That assurance should come through reasonable incentives and accountability standards, versus regulations that are too lax, or draconian restrictions that don't solve problems. This type of approach should establish strong sideboards and bycatch controls, while also providing incentives and flexibility for the trawl fleet to find creative solutions to avoid salmon and other prohibited species.

ATA believes that a long-term plan to reduce salmon bycatch can, and must, be developed. In the interim, we ask that a hard cap be promulgated for non-pollock GOA trawl vessels as soon as practicable, as was done in the pollock fishery.

Additionally, relevant research and analyses should continue, and be refined where necessary, to help answer the many outstanding questions about the nature and composition of GOA trawl bycatch and how to control and reduce it.

Thank you 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,

Executive Director