



Alaska Trollers Association

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December 21, 2021

Alaska Board of Fisheries
 c/o ADFG Board Support
 PO Box 115526
 Juneau, AK 99811

Re: **Overview of SEAK Proposals**

Dear Board of Fisheries Members:

Alaska Trollers Association (ATA) represents the power trollers and hand trollers who fish throughout the waters of Southeast Alaska up to and including Yakutat. Since we have a very high percentage of Alaska resident fishermen, we are a significant proportion of the SE Alaska community economies. Our fishery has been in operation for well over a century, although we harvest about a third of our historical Chinook catch mostly due to three brutal Treaty reductions. Below is an overview of our stance on the many proposals before you. Additionally, we have submitted separate comment letters on Proposals 83, 92 and 115 in order to provide a more in-depth description of those issues.

80	ADFG	internal payback if all - gear harvest is exceeded	ATA supports	This also lays out the 80-20 split and explores payback if aggregate exceeded	The gear group that exceeds that exceeding year seems reasonable
81	Steve Merritt	unharvested lapse to trollers	ATA supports	This is currently practiced successfully as troll harvest can be precisely managed.	
82	ADFG	codifies status quo specifying resident sf preference	ATA supports as amended by TS & Sitka AC	Residents should have priority access to fish therefore no July closure for residents. Non-resident sector needs to be accountable.	Remove resident July closure instead close nonresidents one week earlier as TS suggests and make the non-residents accountable to live within their means

83	SEAGO	guarantees nonresident sf allocation at low tiers	ATA opposes	Prior to early 90's the guides were allowed into our quota until the BoF 80/ 20 split: this removes that encapsulation	Trollers have already lost 2/3 of our Chinook allocation while non-res sf has grown unchecked. Why would our State give guaranteed minimums to non-residents?
84	Jesse Walker	limitations on nonresident sf/ no resident sf closures	ATA supports	ATA consistently supports resident SF harvest	Alaska needs to recognize the unregulated growth of one sector, non-res sf, creates pressure on the resource and puts our local economies second.
85	Territorial Sportsmen	preference to resident sf	ATA supports	ATA consistently supports resident SF harvest	Alaska needs to recognize the unregulated growth of one sector, non-res sf, creates pressure on the resource and puts our local economies second.
86	Steve Hoffman	preference to resident sf	ATA supports	ATA consistently supports resident SF harvest	Alaska needs to recognize the unregulated growth of one sector, non-res sf, creates pressure on the resource and puts our local economies second.
87	Charlie Piercy	xmas tree proposal: more needs to be done to protect the Behm Canal stocks	ATA voted to support amended - without 6 & 7	These actions are recommended to save Unuk and Chickamin stocks from a troller who has watched the decline and improprieties over time.	Amend by pulling #6 & #7 within (although we support those in concept). Rewording needed so it has a chance of passing.

88	Steve Merritt (who later pulled his support)	more moderate than #83 but gives Kings away to unchecked non-resident fishery	ATA opposes	This is a fear based response to Proposal # 83 introduction. ATA is opposed to any allocative changes and requests that all sectors to be managed not to exceed their allocation annually.	Why would Alaska give preference of any guaranteed minimums to non-residents? By nature, and definition, fishing is not an act of guaranteed result.
89	Matt Lawrie	allows 2 more lines if permit stacking	ATA supports	In a surprise vote, the ATA board voted to support this board member's proposal to allow PT permit stacking increasing lines from 4 to 6	This may stabilize permit prices and/or potentially allow easier access into our fishery but highly divisive in our fleet and Sitka AC voted against
90	Tad Fujioka	housekeeping	ATA supports	Change the trigger from AI based to CPUE trigger per new Treaty agreement	Puts uncaught winter kings in spring fishery
92*	Brian Merritt	reduces size limit in THA's	ATA voted to support with amendment	We support this proposal with a modification to specify the 26.5 length to fork.	We encourage ADFG to apply this to all spring THA fisheries since there is a documented size decrease in returning stocks. See separate ATA letter.
94	Ralph Fenner	limit non-resident sf	ATA supports	ATA supports	As a matter of consistency, the SE non-resident fishery needs containment.
96	Charlie Piercy	expand Herring Bay THA area	ATA supports	ATA supports	
97	Steve Merritt	close seining & gillnetting when trolling closed in Anita Bay	ATA supports	Historically trollers had a line in there. Find out if SSRAA supports.	
101	Pioneer Alaskan Fisheries	straying per Nancy at Crawfish	ATA opposes	Particularly Crawfish has proved very worthwhile to our fleet	

103	Pioneer Alaskan Fisheries	Per Nancy AK Hatcheries are not in compliance with mandates	ATA opposes	We oppose this based on our harvest dependency on hatchery fish	
104	SSRAA	establishing a Burnett Inlet THA	ATA supports	housekeeping	
105	SSRAA	establishing a Port St Nicholas	ATA supports	housekeeping	
106	SSRAA	special harvest area gillnetters at Port St Nicolas	ATA supports	housekeeping	
107	SSRAA	establishing a Port Asumcion THA	ATA supports	housekeeping	
108	ADFG	special harvest area Port Asumcion	ATA supports	housekeeping	
109	SSRAA	special harvest area Carroll Inlet	ATA supports	housekeeping	
114	William Dawley	would allow HT to also use fishing rods with 2 hooks	ATA supports with caveat	We support as long as down riggers are hand operated not power	
115*	ATA	move winter fishery start from Oct 11 to first day of Week 41	ATA supports	Per PST our fishery should start on the first day of Week 41 but has not.	See separate ATA letter of support with charts and rationale.
116	Ralph Wells	sell wasted kings For \$1.00	ATA opposes	We appreciate the quest to reduce waste but	Problematic enforcement
117	Jeff Favour	6 lines in Crawfish Inlet for trollers	ATA supports	Should increase troll hatchery harvests at Crawfish	potential problem with enforcement?
121	East POW Advisory	gillnetting stay away from Coffman Cove	ATA opposes	UFA opposes this proposal motivated by one individual	Sets a bad precedent for misuse.

125	SE Subsistence Advisory	Allows incidental taking of king and coho from Taku & Stikine for subsistence	ATA opposes	These two rivers are about to be deemed SOC so the timing is horrible.	Brings forth the question of enforcement and potentially, intent
128	SE Subsistence Advisory	Allowing set gillnets as long as they are fixed / anchored only at one end	ATA opposes	Increasing the efficiency of gear, particularly gear on SOC rivers, will exasperbate weak stocks	We support subsistence harvesting but concerns about SOC dominate
135	Michael Fox	Allows incidental taking of king and coho for personal use	ATA opposes	SE king salmon are either in conservation mode or are already fully utilized by historical fisheries	Adding a new user group is inconsistent with the king salmon conservation and mangement.
143	SE Subsistence Advisory	log book requirements	ATA supports	This illustrates another user group that is frustrated with the increase in the unlimited non-res sport sector	This raises the issue of lack of enforcement on the non-res sector
144	Sitka AC	log book requirements on bare boat charters	ATA supports	This targets the new and growing boat rental who then access larger harvests	Many ATA members have small amounts of halibut IFQ which is the affected harvest

We stand by to answer any questions you may have on the above. Meanwhile, your consideration of the above proposals is appreciated.

Sincerely,



Amy Daugherty
Executive Director