



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400
alaskatrollers@gmail.com
www.aktrollers.org

December 22, 2021

Alaska Board of Fisheries
c/o Board Support Section
Alaska Department of Fish and Game
Juneau, AK 98111

RE: **Proposal 83 (and 82, 84, 86, 94, 143, 144, 146)**

Dear Alaska Board of Fisheries Members,

Alaska Trollers Association (ATA) represents over 900 Power Troll permits and as many Hand Troll permits that fish in the grounds throughout Southeast Alaska and west of Yakutat. Although trollers have probably the smallest commercial vessels in these waters, we produce the highest quality commercial fish - bringing aboard one salmon at a time. Since Trollers are 81% Alaska resident we are a major economic contributor throughout the region. Troll data at ADFG dates back to 1911 and ATA has been in existence since 1924. There is informal documentation preceding those dates as well.

Trollers, as a viable and entrenched SEAK economic contributor, have 3 major problems: Treaty, Unbridled Growth of the non-resident sport fish industry, and opportunist environmental NGO's. The **proposer of Proposal 83** participates in the first two of these problematic forums for us. By way of background, we should mention that the three PST Chinook losses since 1998 have reduced our Chinook catch 35% + 15% + 13.2% (per the December 2019 McDowell report commissioned by NSRAA to evaluate the economic impacts on SEAK from this Treaty process). So, any "fat" has certainly been cut off the bone already, so to speak.

Two SEAGO board members served on the Northern Panel of the PST negotiations for Alaska, although one is not a resident of Alaska. While we don't claim there was bad faith executed in the Treaty negotiations, ATA did however, at the outset of those negotiations, offer to go along with the proposed mitigation measures if SEAGO agreed not to aggress towards us in this Board of Fisheries forum. (Note the 2019 PST mitigation plan provided significantly more relief for other parties than for Trollers which are the most negatively affected harvesters). The point is: It was well known by all parties involved at Treaty that the outcome would involve overall "belt-tightening" but apparently it is only a one-way street with this sub-sector.

What's before you in this set of SEAK proposals is a full acknowledgment of the total frustration with the growth and greed of the non-resident sport fishery. You have this letter from us, 4 proposals from

resident sport fishermen, one from the Sitka Advisory and one from the Subsistence Advisory Board. They all reach out to you requesting that this board take strong action to stop the unlimited growth of the non-resident sport harvest and make this sub-sector more generally accountable and more accountable within their current allocation without guarantees or preferential games. There is no guaranteed catch in the act of fishing and they should advise their clients of such.

Or do we have a commercial meat fishery, under the guise of sport fishing, which remains untaxed, for the benefit of non-residents, on a very limited Chinook resource? Why does Alaska condone this? While many of our SEAK trollers struggle with yet more Treaty decrements, there are more lodges being built. Why not? ATA believes we all need to keep our own “houses”, or sub-sectors, in order and stay within our own allocations. I, as a 47-year Alaska resident, am mortified at the lack of accountability and lack of guts of policymakers to date at reigning in this component of our precious Chinook resource harvest.

Proposal 83 gives preferential treatment to this non-resident sub-sector. It will require trollers to “loan” them an unlimited amount of Chinook without any assurance that they won’t “borrow” more the next year, and the next year again (infinitely) when we are in the 4 lowest tiers since this Treaty adopted this CPUE tier system. In fact, all three of the 3 last years since Treaty would have been subject to liberalization of the non-resident limits under this proposed scenario. And, there is no repayment plan proposed – it is an open-ended reallocation. If SEAGO wants a guarantee of no in-season Chinook closures then ADFG should manage conservatively, if that’s a risk, and Guided Sport should stop expanding their Chinook season into April. We all receive notice of the CPUE tiers early in the new year.

With budget cuts, creel surveys have been greatly reduced, as has (reportedly) enforcement. Many user groups question the veracity of data coming from the non-resident sportfish subsector (as written in Proposal #146), while the growing bare boat subsector (per proposal #144) largely accelerates localized depletion surrounding our communities. While the new in-season reporting is helpful, we question why it takes 2 weeks to compile. Ideally the involved sub-sector would address these concerns.

We request your attention to the non-resident sport sub-sector issues since these proposals clearly dominate this meeting. It is late for our State’s Board of Fisheries to protect our State’s small community residents, **but it isn’t too late. We need real leadership on the accountability of this sub-sector and ask this Board to rise to this challenge**, for the sake of the resource and our region.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Daugherty', written in a cursive style.

Amy Daugherty
Executive Director

