



Alaska Trollers Association

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

February 20, 2024

Gretchen Harrington, M.S.
Assistant Regional Administrator for Sustainable Fisheries
Alaska Regional Office NMFS
Juneau, Alaska
Emailed: gretchen.harrington@noaa.gov

Re: NOAA-NMFS-2023-0152. "Notice of Availability of a Draft Environmental Impact Statement for the Issuance of an Incidental Take Statement Under the Endangered Species Act for Salmon Fisheries in Southeast Alaska Subject to the 2019 Pacific Salmon Treaty Agreement and Funding to the State of Alaska To Implement the 2019 Pacific Salmon Treaty Agreement."

Dear Ms. Harrington,

The Alaska Trollers Association (ATA) is a trade association that advocates for the wellbeing of the Southeast Alaska Chinook Salmon Troll fishery and the small community families reliant on our fishery. Our members are professional hook and line fishermen and support businesses who are dedicated to sound resource practices and the delivery of wholesome and sustainable, fine quality seafood to the marketplace. We are providing these comments on the above-cited EIS.

The Alaska Trollers Association supports Alternative 2 as the proposed action. Alternative 2 is responsive to the court's order directing an updated Biological Opinion be issued concerning the impacts of the fishery and, that an updated Incidental Take Statement be issued for all Southeast Alaska salmon fisheries covered under the Pacific Salmon Treaty. As stated in the original opinion, "these impacts are not expected to result in negative population level impacts to any species that interacts with the SEAK salmon fisheries." Alternative 2 also directs annual federal funding to the State of Alaska be continued to provide management and monitoring for the fisheries covered by the Pacific Salmon Treaty.

ATA does not support Alternative 1, given the direction of the court, because ATA is codefendant with NMFS and the State of Alaska in the lawsuit that prompted the ruling.

Nor does ATA support Alternative 3 because loss of the Incidental Take Permit will put our fishermen in violation of the Endangered Species Act and subject to penalty. Our fishermen hold limited entry permits and are committed to salmon fishing as a lifetime occupation. The consequence of being found to be fishing illegally can be the forfeiture of boat and permit. An analogous situation would be that of a small business owner being fined, stripped of licenses and certification and confiscation of the property and inventory. ATA certainly cannot support the draconian choice offered in this alternative.

Furthermore, we cannot support the suspension of the annual funding for State management as a punitive consequence resulting from the deficiencies of the biological opinion.

Thank you for opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Daugherty', with a long horizontal flourish extending to the right.

Amy Daugherty
Executive Director