



Alaska Trollers Association

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Lance Kruzic
Project Coordinator
National Marine Fisheries Service
2900 NW Stewart Parkway Roseburg, Oregon 97471
Submitted electronically via: hatcheries.public.comment@noaa.gov

Re: Comments on the Draft Programmatic Environmental Impact Statement (PEIS) for the Expenditure of Funds to Increase Prey Availability for Southern Resident Killer Whales.

Dear Mr. Kruzic,

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 low-impact fishery. Our 450 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 PEIS.

ATA supports the preferred Alternative 2 – We support the Hatchery Prey Increase Program because it will build on already-established program to increase the number of salmon available in the Puget Sound/Salish Sea area. Trollers in Alaska have supported habitat improvements, hatchery programs and responsibly managed fisheries since the Pacific Salmon Treaty was signed in 1985. We care about salmon throughout their range and conduct ourselves accordingly. We concur with the more detailed comments submitted by the non-Federal Commissioners of the Pacific Salmon Commission.

We do not support Alternative 1 - This alternative would cease the funding for a program that is part of a well-thought-out approach, already underway, with several year classes of Chinook maturing in the ocean and soon to return.

We do not support Alternative 3 as a stand-alone - This alternative addresses a habitat-based Prey Increase and while our members name spawning habitat destruction the leading cause of productivity declines of wild salmon populations, this should be addressed only as a supplement to Alternative 2. Currently, habitat improvements are funded and supported by ATA members, the Pacific Salmon Commission programs, and the AK Congressional delegation. The choice between Alternatives 3 and 2 causes us to rate 3 as less desirable because habitat remediation programs take years to implement and mature.

We certainly do not support Alternative 4 - Reduced Fishing to Increase Prey is well understood by our

members and is not supported as a choice that will bring relief to the SRKW. Our annual proportional share of Chinook salmon harvests since 1985 has already been reduced by over 50% from our historic proportional catch. Over 8 million Chinook have been allowed to swim free of our fishery since 1985 and are immediately vulnerable to harvest by 13 other Salmon Commission fisheries while traveling to their southernmost spawning grounds. Hitting us with a sledgehammer does not transfer fish to SRKW.

In conclusion, the combination of revitalizing chinook populations through enhancement programs, Alternative 2, with remediation of their habitat, Alternative 3, will provide the most meaningful benefit to the SRKW and their biome.

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