



Alaska Trollers Association

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Chairman Eric Olson
North Pacific Fishery Management Council
605 West 4th, Suite 306
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Dear Chairman Olson and Council Members:

The Alaska Trollers Association (ATA) is concerned about salmon bycatch in Gulf of Alaska (GOA) trawl fisheries. While we appreciate that the Council and industry have stepped up to the task of developing a long term management plan to reduce salmon bycatch, we believe the effort should also include emergency regulations for 2011, to provide the tools necessary to avoid spikes in bycatch, as was witnessed in 2009-10. The Advisory Panel has developed some good short-term recommendations for the Council to work with.

With respect to a long-term solution, full retention; modifications to the observer program; better enumeration of bycatch numbers by various trawl fisheries; identification and management of any 'hot spot' areas where salmon are caught by trawlers in both federal and state waters; and better use of stock identification methodology to define stock composition of trawl bycatch are essential aspects for addressing this issue. All efforts should be made to design a plan with affected trawl fishermen, including consideration of cooperatives.

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. With about 2,500 hand and power troll permits, trolling ranks among the largest fisheries in the state. Our fleet has a residency rate of 85% and roughly one of every 35 people in Southeast works on the back deck of a troll boat. When you add in gillnetters, seiners, anglers, guides, and subsistence users -- in addition to the processing and support sectors -- it becomes obvious that healthy salmon runs are crucial to the economic and social well-being of our region.

According to Alaska Groundfish DataBank, in 2009-2010 trawl bycatch of Chinook salmon alone increased by about 594% from the previous period. ATA hesitates to react to short term variations in bycatch levels in any fishery, and understands that a variety of factors can account for such increases. However, our members firmly believe that the trawl fleet must be held accountable through emergency measures intended to prevent a similar situation in 2011. This type of planning is particularly important given sacrifices being made by salmon fishermen from California to Alaska.

ATA is concerned about fishermen in several GOA areas, where some Chinook stocks are not meeting escapement objectives and directed fisheries are experiencing dismal landings and early closures. ADFG recently identified the Karluk River Chinook as a candidate for stock of concern status (ADFG memo to Alaska Board of Fisheries, 9/30/2010). It is important that salmon stock identification studies continue in the trawl fisheries, so the impacts of trawl bycatch on various stocks and salmon fisheries can be better understood and managed.

Since the mid-70s, Southeast Alaska fishermen have endured significant conservation restrictions to rebuild Chinook salmon from Alaska, British Columbia, and the Lower 48. These stocks are broadly dispersed in the North Pacific Ocean and Bering Sea. Trollers and gillnetters first lost access to Taku and Stikine River stocks,

which have just recently rebuilt to the point that Alaska could negotiate a conservative harvest sharing plan with Canada. Unfortunately, we are still not always able to conduct these fisheries. ADFG has just announced that neither directed fishery is likely to open in 2011, due to forecasted returns that may not provide harvestable surpluses. These stocks return to spawn in the spring and are likely present in the trawl fisheries.

The Council and Board of Fisheries imposed harvest caps on trollers prior to the signing of the Pacific Salmon Treaty in 1985. When the Treaty deal was struck, a 15-year Chinook rebuilding program was implemented and the Southeast Chinook quota was set at 263K -- 100K fish below historic average. At that time, a commitment was made to our fishermen that, through a combination of hatchery mitigation and wild stock rebuilding, the Southeast Chinook harvest would surpass 500K annually by the new millennium. Yet, despite the fact that the far north migrating salmon stocks that Alaska is responsible for are considered rebuilt, the Southeast TAC has been chronically suppressed, to a low of 140-145,000. In 2010, our quota was the 7th lowest since Treaty signing and, at 221,800, was more than 40K less than the original Treaty rebuilding quota.

Since 1998, Southeast Chinook harvesters have been living under a Treaty mandated 'abundance based' agreement that is extremely conservative. In 2008, that agreement was further modified by the addition of a 15% quota cut for each of 10 years. Rough estimates place the cost to the troll industry of the 2008 Treaty agreement at \$30-40 million. The troll fleet alone is expected to lose \$1-2 million per year. In 2006, trollers were paid roughly \$32 million ex-vessel, which was over 10% of the entire statewide salmon value. Chinook made up half of the fleets earnings that year. The state general fund received nearly \$1 million in fisheries business tax revenue from the troll fishery in 2006.

As the primary harvesters, trollers have endured the most significant direct reductions in overall harvest and season length, but all Southeast Chinook fishermen have suffered, which has subsequently amplified allocation disputes between the users.

As one of our two primary target species, each Chinook is golden to a troller; anything that impacts their long term survival is of concern to our fleet. Obviously, there are numerous factors affecting the Southeast Chinook quota, including the Endangered Species Act (ESA). The impact of trawl bycatch on the abundance of our salmon stocks is not at all clear. So, the point of providing a snapshot of our harvest history is not to blame the trawl fleet, but simply to show that trollers, and other salmon fishermen, have, and are, making substantial sacrifices to conserve and share Chinook salmon. For the good of the coastwide salmon resource and fisheries, trawl bycatch must be dealt with in 2011 and beyond.

In conclusion, ATA is encouraged by discussions between trawlers and fishery managers and believes a good long-term plan to reduce salmon bycatch can be achieved. In the interim, we ask that emergency regulations be promulgated as soon as practicable, to begin addressing bycatch concerns in 2011. Additionally, relevant research and analyses should be expanded and/or initiated, to help answer the many outstanding questions about the nature of GOA trawl bycatch and what avenues exist to control and reduce it.

Thanks for your participation in the Council process. ATA appreciates your dedication and service to the resource and user groups. If we can provide additional information, or otherwise be of assistance on this or other issues, please feel free to contact me.

Seasons Best!

Dale Kelley
Executive Director