



United Southeast Alaska Gillnetters

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John Jensen, Chair
Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526 hand delivered

Dear Mr. Jensen:

The United Southeast Alaska Gillnetters (USAG) is an association of about 150 small business owners who catch salmon by drift gillnetting in Southeast Alaska and market salmon throughout the United States. USAG is a southeast, district-wide organization, representing all 475 drift gillnet permits in existence. Please find our positions on the respective proposals below as listed along with many of our concerns. In advance, we appreciate the time and concern put forth by you and members of the board to carefully consider each proposal.

Proposal 261: Oppose-

1. 261 advocates development of a management plan that will increase purse seine access to pink salmon stocks bound north from District 12. This proposal is just the latest effort at increasing purse seine harvest of all salmon species that spawn in Districts 11B and 15 and that sustain the drift gillnet fisheries in those districts. The proposal is unnecessary and it poses a number of negative considerations. It should be rejected.
2. 261 is unnecessary because existing regulations already cover the issue in detail. These regulations include test-fishing procedures for monitoring the relative abundance of pink, sockeye, and chum salmon in determining whether purse seine harvests can be allowed and established limits on the harvest of sockeye when purse seine fishing is permitted. The current proposal makes no reference to these regulations, suggests nothing that is deficient in the existing management scheme, and offers no specific rationale for considering its adoption as a justifiable or even reasonable change in regulations. In truth, this area of District 12 presents such a great mixture of species and stocks bound for widespread spawning areas that a far better argument can be made that the appropriate fishery management approach to the area is to allow no fishing at all.

3. Adoption of 261 should be denied based on several serious considerations beyond the fact that it seeks direct, uncompensated reallocation from another gear type in its established fishing areas.
4. The stocks in the mixing area of northern District 12 involve runs that are bound both to the north and south. The vast majority of pink salmon that enter this area are southbound into Chatham Strait where the purse seine fishery has exclusive access to those stocks after they have segregated from northbound stocks of all species.
5. Proponents of 261 suggest that unharvested surpluses of pink salmon occur in some years in Districts 11B and 15. That is true as is the fact that significant unharvested surpluses occur in Districts 12 and 14. In fact, in the few years that extra pink salmon return to Districts 11B and 15, District 12 shows even greater levels of unharvested pinks. In addition, such surpluses occur in District 12 in many years when few pink salmon return to the more inside districts.
6. Small Chatham Strait sockeye stocks, and the effect of the northern District 12 purse seine fishery, previously have been the focus of concern for subsistence users. Those sockeye generally are exhibiting returns below optimal levels and should not be subjected to unnecessary harvest before they have moved toward their spawning streams and begun to segregate from harvestable pink and/or chum salmon.
7. Pink salmon that reach Districts 11B and 15 are harvested in the gillnet fisheries there. Those fisheries are regulated by the abundance of wild sockeye salmon, not pinks. In years of low sockeye abundance, pink salmon in excess of escapement need may go unharvested. However, when in northern District 12, those pink salmon are mixed with the same weak sockeye stocks and thus cannot be harvested without catching more of the sockeye that already are causing restrictions on the gillnet fisheries.
8. Regarding the various sockeye populations returning to Districts 11B and 15, the gillnet fisheries can be managed to protect individual weak sockeye stocks while harvesting stronger sockeye returns as well as pink salmon migrating with those sockeye. As noted above, the northern District 12 purse seine fishery cannot be controlled in this manner. Fishery management that can respond to specific stock needs is more consistent with Board of Fisheries mixed stock and sustainable fishery policies than is the indiscriminate mixed stock purse seine harvest in northern District 12.
9. Recent returns of sockeye salmon to Chilkat Lake in District 15 have been so poor that the gillnet fishery is unlikely to be permitted any directed harvest in 2009 or quite possibly in subsequent years as well. Chilkat sockeye mix with pink salmon throughout the Hawk Inlet shore area of northern District 12. No incidental harvest of these sockeye should be allowed in District 12 when the more terminal District 15 gillnet fishery is restricted based on the status of this stock. In addition, provided that Chilkoot Lake sockeye are not a serious management concern, the most significant run of pink salmon in District 15 can be harvested in the gillnet fishery without impacting Chilkat sockeye.
10. Wild Speel Lake sockeye mix extensively with the other salmon stocks that enter through northern District 15. The escapement level of those wild sockeye governs the ability of the District 11B gillnet fishery to harvest returns to the Snettisham hatchery, especially within Port Snettisham itself. In 2008, the minimum escapement goal was not attained and thus no terminal area harvest by the fleet was allowed. The wild Speel sockeye population is always quite small in numbers, so any harvest in District 12 may delay and possibly prevent gillnet access to the terminal area of a major production hatchery.

11. 261 looks to create a plan that will increase purse seine harvest of pink salmon. It needs to be understood, however, as an effort to increase access to the other salmon species that sustain the gillnet fisheries. Districts 11B and 15 do not support major pink salmon production, accounting for only small percentage of the cumulative pink salmon escapement goal index for northern southeast Alaska (Districts 9-15). The pinks that do return to the gillnet districts are utilized by those fisheries. The purse seine fishery typically foregoes more pinks in its traditional fishing districts than return in total to Districts 11B and 15. In sum, the advocates of 261 do not propose a legitimate or even plausible reason for requesting more of the salmon on which another gear group has depended for decades. Proposal #261 should be rejected by the Board.