



United Southeast Alaska Gillnetters

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February 2, 2009

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 230 & 231: Oppose

Since District 11 has been open for directed Chinook salmon harvest in only one season since the current regulations were enacted at the 2006 Board meeting, no credible claim about catch patterns relative to some prior era is possible. At the least, it is premature, and really inappropriate, to return to the Board requesting more time and opportunity in District 11 on the basis on one season's experience, one in which very little troll effort was recorded despite successful sport and gillnet harvests of Taku River Chinook. However, basic issues regarding Chinook salmon fisheries in southeast Alaska, especially relating to the salmon treaty with Canada, are raised by this proposal. Hence, it is necessary to review important factors that argue, on the merits, against expanded, or any, troll fishing in this area.

1. The proposal requests 7-day-per-week access to this Chinook resource that is fully utilized in the terminal areas (District 11) by the extensive sport and gillnet user groups.
2. There is currently adequate troll time directly in front of the transboundary fishery utilizing large swaths of area in District 11. This newly designed troll area was negotiated by an advisory fisheries task force for the Taku in response to the troller's

- request for additional chinook harvest opportunities. The agreement was put into regulation in 2006 specifying that for every day of a transboundary fishery (gillnetting), there would be 3 days of trolling directly in front which encompasses the south and north corridors of the Taku. For every day, plus one hour of gillnetting, there would be five days of trolling. Saturday and Sunday fishing for both groups was removed as an alternative in order to not interfere with local sport fisheries primarily utilizing the weekends.
3. There is no history of significant troll harvest of Taku River Chinook salmon in the spring time in District 11. At best the troll fleet can point to anecdotal evidence meant to reverse limited entry implementation of gear group areas. Only data available on District 11 troll, points to harvest opportunities on chinook well past the May and June currently directed fisheries. This limited data suggests a limited troll take after Statistical week 26 or later. Troll harvests of Chinook involved an undocumented mix of stocks that could have contained at most a trace of Taku-origin fish as 98% of the Taku run would have already escaped up the river by this time. Virtually all troll effort and catch occurred in more southern portions of Stephens Passage, particularly in the vicinities of Pt. Hugh and Holkham Bay.
 4. The assertion that trolling interests contributed substantially to the rebuilding of Taku River Chinook is essentially empty. The directed gillnet Chinook fishery in Taku Inlet was closed for 30 years. However, following ratification of the Pacific Salmon Treaty with Canada in 1985, an extensive effort was undertaken to increase Chinook salmon abundance throughout southeast Alaska using existing enhancement facilities. In order to harvest production from these new enhancement projects, 31 “hatchery access” areas were created exclusively for spring troll fishing around the region. Five of those areas are in the migration corridor for returning Taku River Chinook. Estimates by ADFG staff indicate that roughly 1,600 Taku-origin fish are taken in these areas annually. The troll fishery has not sacrificed much of anything as part of the successful rebuilding of Taku River Chinook. The spring fisheries occur every year regardless of whether there are substantial numbers to warrant a transboundary (US or Canadian gillnet) fishery.
 5. Any troll fishery in District 11, certainly if on a 7-day-per-week basis, would cause significant conflict with other user groups. Juneau area population roughly has tripled since the “historic” 1960’s-1970’s period. Sport fishing in the area arguably has increased even more with more capable vessels and the development of a charter fishery. Superimposing a troll fishery that would compete for salmon and for prime fishing locations with this active, established sport fishery is an obvious formula for resentment and confrontation. Since the gillnet fishery for Chinook is confined to the vicinity of Taku Inlet and occurs in glacially influenced waters, there is very little conflict with the sport fishery. It is unlikely that much troll effort would be directed into the limited gillnet area, but any mixing of the commercial gear types while actively fishing would generate serious conflict and likely spur violent interactions.
 6. Trolling in District 11 undoubtedly would capture Chinook salmon. However, experience indicates that the sport and sport charter fisheries encounter large numbers of immature Chinook, a large proportion of which are below legal retention length. (Taku River Chinook rear in distant offshore waters and are not encountered in District 11 prior returning in their spawning run.) Increased trolling in an area with

known concentrations of rearing Chinook means that significant incidental mortalities of sub-legal fish would occur. Under the Treaty, accounting for total mortalities of Chinook in a fishery, not simply for total harvest, is required. Especially in a fishery that would not provide net benefit in harvest to the regional troll fishery and would affect other user groups negatively, increased incidental mortalities cannot be justified.