



United Southeast Alaska Gillnetters

P.O. Box 20538, Juneau Alaska 99802-0538 (907) 586-6550 usag@alaska.net

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 227: Oppose

This proposal would open District 8 to trolling 7 days a week during any week that gillnetting is permitted. The management of the District 8 directed King salmon fishery was a major issue of focus during the 2006 Board of Fisheries (BoF) meeting. We believe it is inappropriate to return to the board for more time and opportunity for additional troll time and area so soon after the BoF enacted the Stikine Chinook management plan at its last meeting. The proposal inaccurately suggests that the trollers are not catching their "historic" volume of fish.

1. The "historic" figures cited by the troll fleet are questionable at best and incorrect at worst. The Department has never done a systematic review or study of the "historic" fishery that was available for industry review. We believe such a study should be done before more opportunity is made available to the trollers based on any "historic" sharing argument. While historical anecdotal data is often thrown around between differing gear groups, systematic changes were made during implementation of the limited entry program. Whereas occasioned usage was factored in to create long-term sustainable and usable district areas for each type of gear. Reversing this trend and overlapping, stacking, granting additional time and advantaging one gear group over another will likely set a precedent for all gear groups to aggressively expand and seek area and time in other areas not currently available to a particular gear group.

2. There has been a low participation by trollers fishing in District 8 in the last two years since the BoF decision to allow expanded trolling opportunities. If current area and time is under utilized, then why give even more time for a disinterested fleet that chooses to focus more on the spring troll openings and hatchery production areas?
3. The spring access fisheries for the trollers provide nearly constant access to Stikine bound chinook. These spring time troll openings provide an opportunity for the trollers to harvest Stikine chinook regardless of whether there is a joint US-Canada Transboundary fishery. In other words, when the transboundary fishery is not occurring (no gillnetting) trollers still have ample opportunity to catch Stikine bound Chinook in many of the spring time troll areas. Most of these areas are open for most if not all of May and June when 98% of Stikine chinook pass through these troll areas to return to the river.
4. Under the current regulations for District 8, trollers are allowed to fish 3 days for each day of gillnetting and 5 days when the gillnetters receive 1 hour more than 1 day. These directed District 8 openings do not preclude any spring troll king fishery from occurring. Those spring king troll fisheries are unaffected by any District 8 openings. Expanding to seven days a week is not only unwarranted, but places all conservation efforts onto the gillnet fishery as they are the only group with any closure time on Stikine bound chinook.