

Jan 4, 2022

**A Joint Statement on King Salmon
Management in Southeast Alaska**

By

THE ALASKA TROLLERS ASSOCIATION

And

THE TERRITORIAL SPORTSMEN, INC.

For

THE ALASKA BOARD OF FISHERIES

The Alaska Trollers Association and Territorial Sportsmen represent well over 2500 resident sport and commercial fishermen and their families in Southeast Alaska. We are the two largest organized groups of residents in the region with advocacy interest in king salmon management and conservation. We come to you in an unprecedented alliance to ask that you understand the history of the resident preference in the Southeast Alaska King Salmon Management

Plan (SEAKKSMP, or management plan), and that you preserve and strengthen it through the proposals before you.

The resident preference in the management plan dates back 30 years. All previous Boards have recognized the unique nature of Southeast fisheries that brought about the preference. The preference is intended to provide for minimal sport fishing restrictions on residents and uninterrupted sport fishing opportunity for king salmon.

The Southeast Alaska sport king salmon fishery is a food fishery. Unlike most other areas of the state, there are no subsistence king salmon fisheries in Southeast except for a short stretch of the Chilkat River near the village of Klukwan. There are no personal use fisheries for king salmon in Southeast Alaska. All fresh waters in Southeast Alaska are closed to the taking of wild king salmon, including by sport fishing. The only means for residents of Southeast to catch wild king salmon for food is from the salt water fisheries. This is true for all residents, including commercial fishermen. This is why past boards have memorialized a resident preference in the SEAKKSMP.

The resident preference is now threatened by the ever increasing fishing power of the nonresident fishery, primarily in outside waters off Sitka and west Prince of Wales Island. This threat was unforeseen when the plan was adopted 30 years ago. The fishing guides association is now attempting to take more fish from the trollers in low abundance years

(Proposal 83), even though they are already taking 70% of the sport quota. If 70% is not enough, the group requesting more needs to be limited rather than expanded at the expense of the trollers or the resident food fishery. Why should trollers, who are an important factor in small community economies, have to forego fish during low abundance years when they are most valuable just to support an unlimited competitive nonresident fishery?

It is now possible for the unlimited non-resident fishery to cause the sport quota to be taken before the end of June. This would close the resident sport fishery for the entire summer rather than protect it. All inside waters are currently closed to sport fishing for king salmon in April, May and June to protect local troubled stocks. The nonresident fishing power in May and June in outside waters could ensure no fishing at all for inside waters communities.

The question now, then, is whether the department can manage the nonresident fishery so that the resident fishery does not have to close for allocation reasons. If they can, perhaps they can explain to the board and to the public how they plan to step down the nonresident fishery in the early season so that sufficient fish are left to sustain a resident fishery in July, August and September.

If the department cannot guarantee protection to the resident sport fishery, then the Board must step in and seriously work with proposals 82, 84, 85, 86 and 94 to slow down or even

stop the expanding nonresident king salmon harvest before it causes a closure to the resident fishery.

Guides and lodges are now booking trips in April and May to assure their clients access to king salmon before any June closure is implemented. We want the Department to proactively manage this fishery in-season, by emergency order under Board regulation or direction, to preserve the opportunity for residents to take king salmon all summer.

We would view any king salmon closure to residents for allocative reasons to be a management failure, and a blow to the residents of Southeast Alaska that should have been avoidable.

The only way for proposal 82 to be fixed is to make clear {by modifying 5AAC 47.055 (b)(6) and (7)} that a major objective is to assure that the Department manages the king salmon fishery to assure that there is never an allocative closure of the resident fishery at any abundance tier.

For clarity it is then necessary to instruct the Department at every CPUE level with the following language: "If the department projects that the king salmon sport harvest allocation is going to be exceeded, the Department shall, by emergency order, adjust the nonresident seasons and bag limits so that there are no closures for residents."

Looking into the future, it is unreasonable to try to guarantee non-residents 70% of the annual king salmon harvest in

Southeast Alaska. If the quota ever shrinks to the point where there is only enough fish for the resident sport fishery, assuming that it is still a quasi-subsistence fishery, that's where the whole quota goes.

In addition, efforts to construct a "pay back" provision should be directed at assuring that any overages be taken the following year from any allowable non-resident harvest.

We offer explicit support for staff proposal 82 as amended by the Sitka Advisory Committee. We offer explicit opposition to proposal 83 by the guides association due to a high potential for unjust reallocation, and likely unrealistic harvest projections in lower tiers. We are also opposed due to a lack of recourse for trollers should the charter catch continue to climb.

Thank you for the consideration you give to this comment on the Southeast Alaska King Salmon Management Plan.



**Ron Somerville for
Territorial Sportsmen, Inc**



**Amy Daugherty for
Alaska Trollers Assoc.**