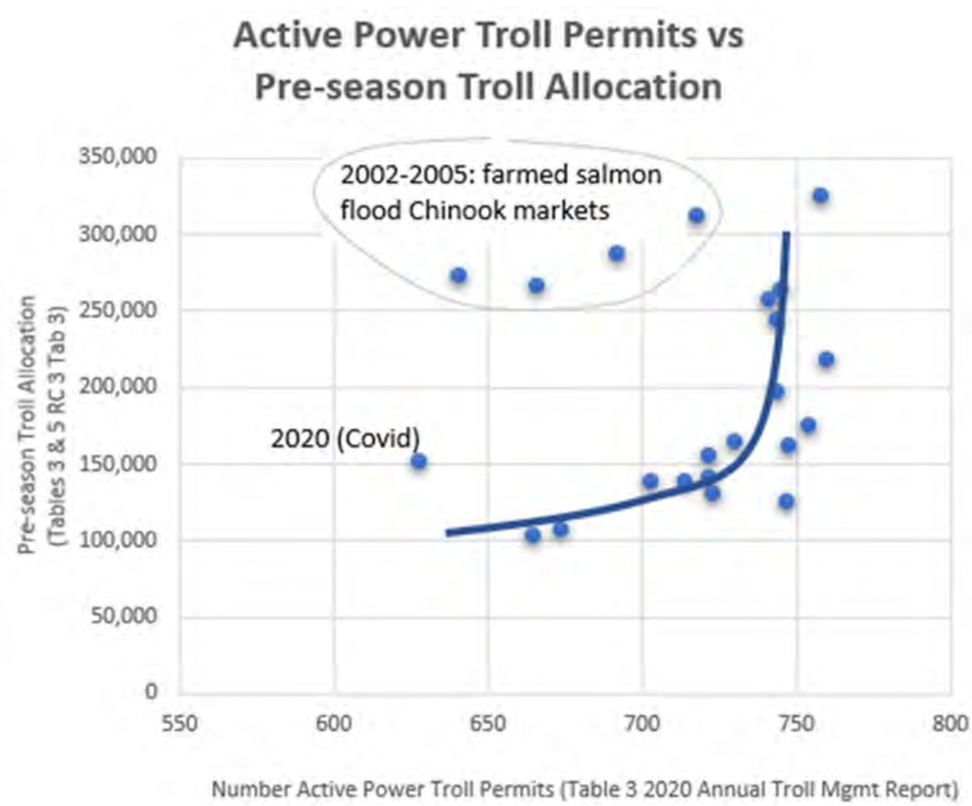
Submitted by Jeff Farvour, March 16th 2022 re **opposition to Proposal 83 and PC 462 with additional data**

Further reducing Troll Chinook allocation will further punish the Troll Fleet:

The Southeast charter industry is in the midst of a fish grab, one that if supported by the BoF will remove licensed trollers from their livelihood on the water. The charter request for additional Chinook in years of low and moderate abundance will strip millions of dollars out of the economies of rural Southeast Alaskan communities. (Page 20 Economic Impact of the Pacific Salmon Treaty on the Alaska Troll Fleet, McDowell Group Dec 5, 2019 "Chinook account for ...approximately $37 million in annual economic output in Southeast Alaska.) Even a 5% reduction would cost our region nearly $2 million every year.

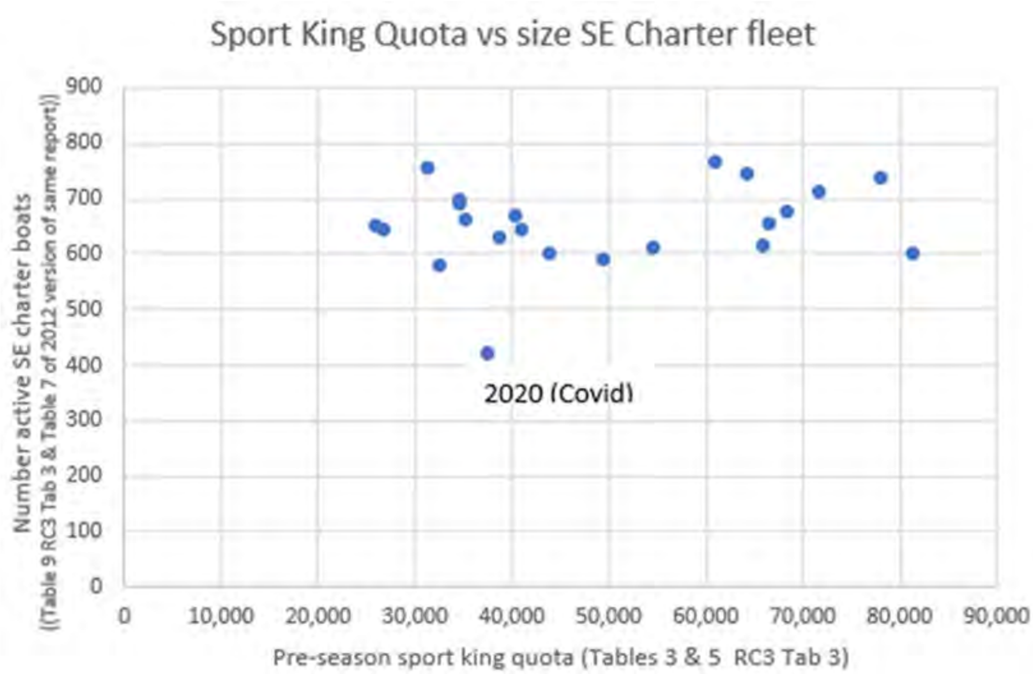
The relationship between the troll Chinook quota and the number of trollers that can make a living is clear:

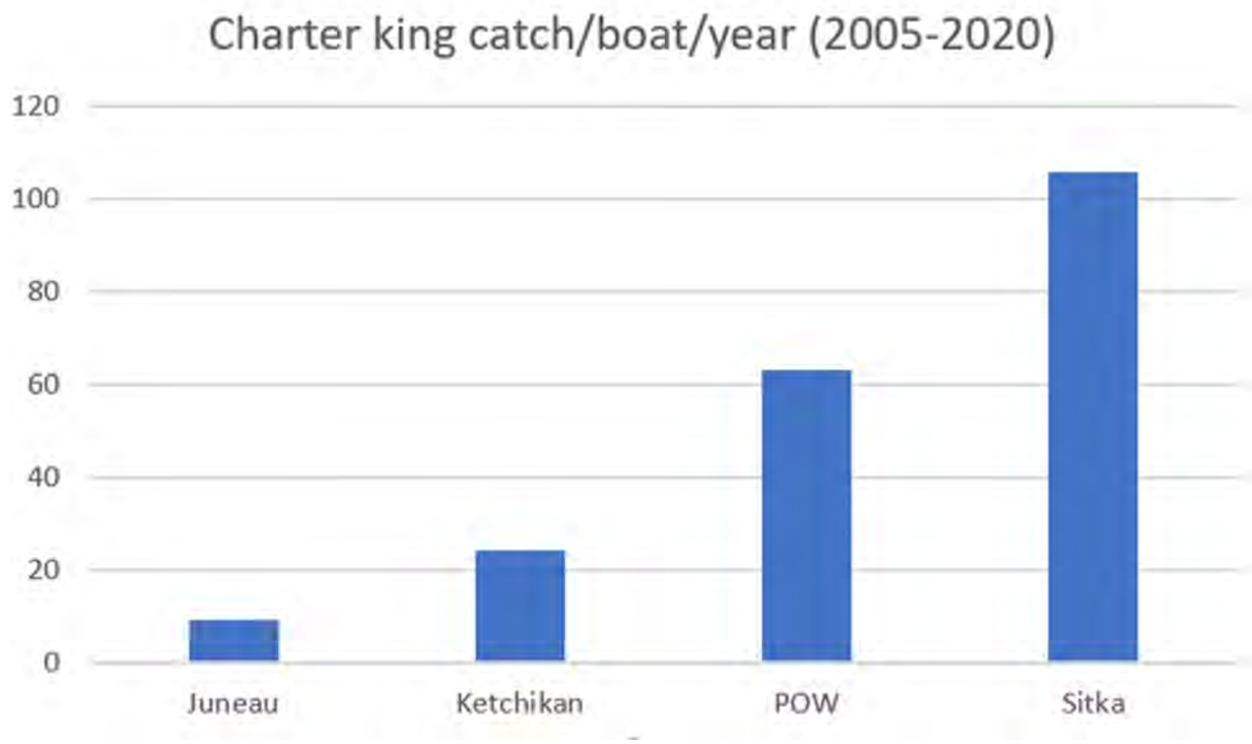
Other than in the exceptional years of Covid (2020) and the farmed salmon disaster of 2002-2005, there is a strong historical relationship between the troll Chinook quota and the size of the active troll fleet. Without at least 150,000 kings, trollers know that there won't be enough fish to go around. When the troll quota drops near 100,000 kings, the troll fleet is amputated.



While the charter industry may anecdotally make similar claims, the BoF should take the time to verify them. Unlike the troll fishery for which each king landed or forgone is worth about $200[1] in ex vessel and first wholesale, there is no direct economic relationship between a sport caught king and the health of the charter industry.

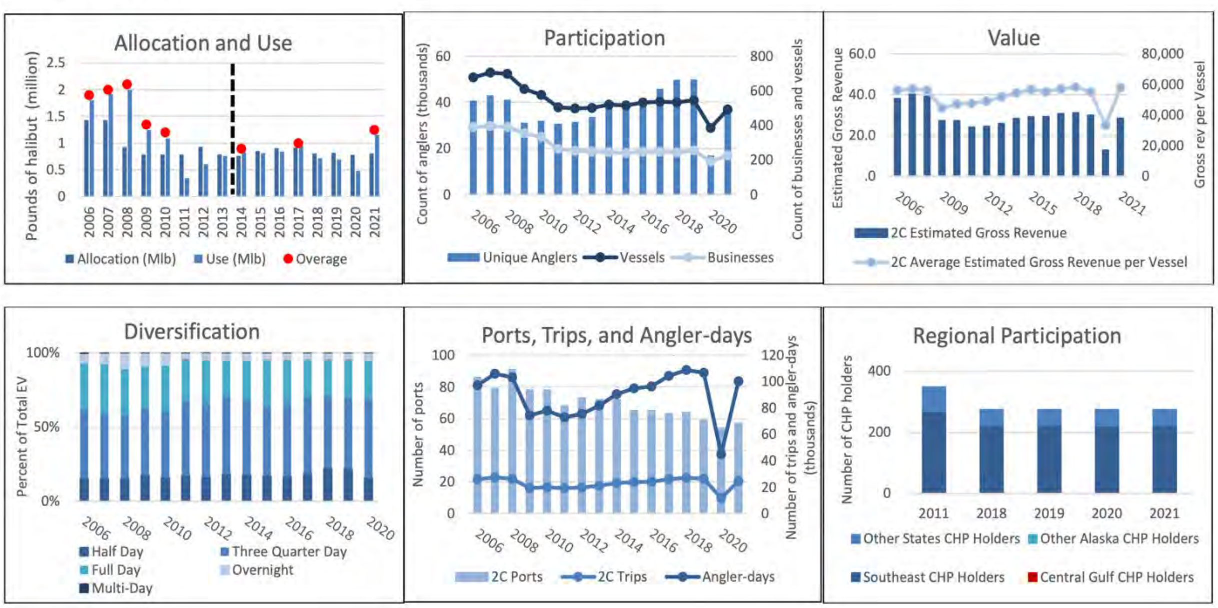
A good example of this can be seen in the following 3 tables. The first is generated from the Overview of the Sport Fisheries for King Salmon in Southeast Alaska through 2020 RC 3 Tab 3 tables 3 & 5 and the second from tables 9 & 13. The third is a dashboard Table 6.2 from the North Pacific Fisheries Management Council Charter/Commercial Halibut Catch Share Plan (CSP) Review[2] which shows the charter sector has increased its client days and value regardless of bag limits. For a more in-depth look at this data, please see the tables and narrative below these with a summary that follows.





6.2 Area 2C and 3A Charter Halibut Sector

Area 2C Charter Halibut



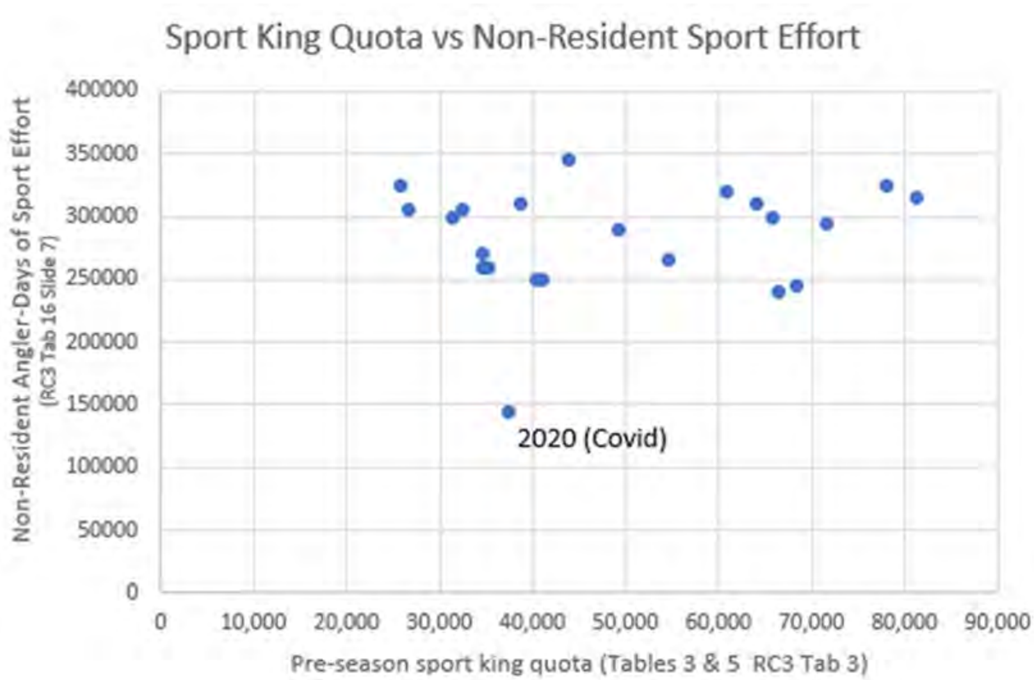
https://meetings.npfmc.org/CommentReview/DownloadFile?p=86c14701-49af-46e3-bb44-dda658e1b9cc.pdf&fileName=D1%20CSP%20Allocation%20Review.pdf

[1] ADF&G COAR data for 2020 SE chinook
https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyfisherysalmon.salmoncatch_wholesale
Alaska Department of Revenue Tax Division
http://tax.alaska.gov/programs/programs/reports/index.aspx?60624

There is actually no historic relationship between the size of the charter fleet and the sport king quota.

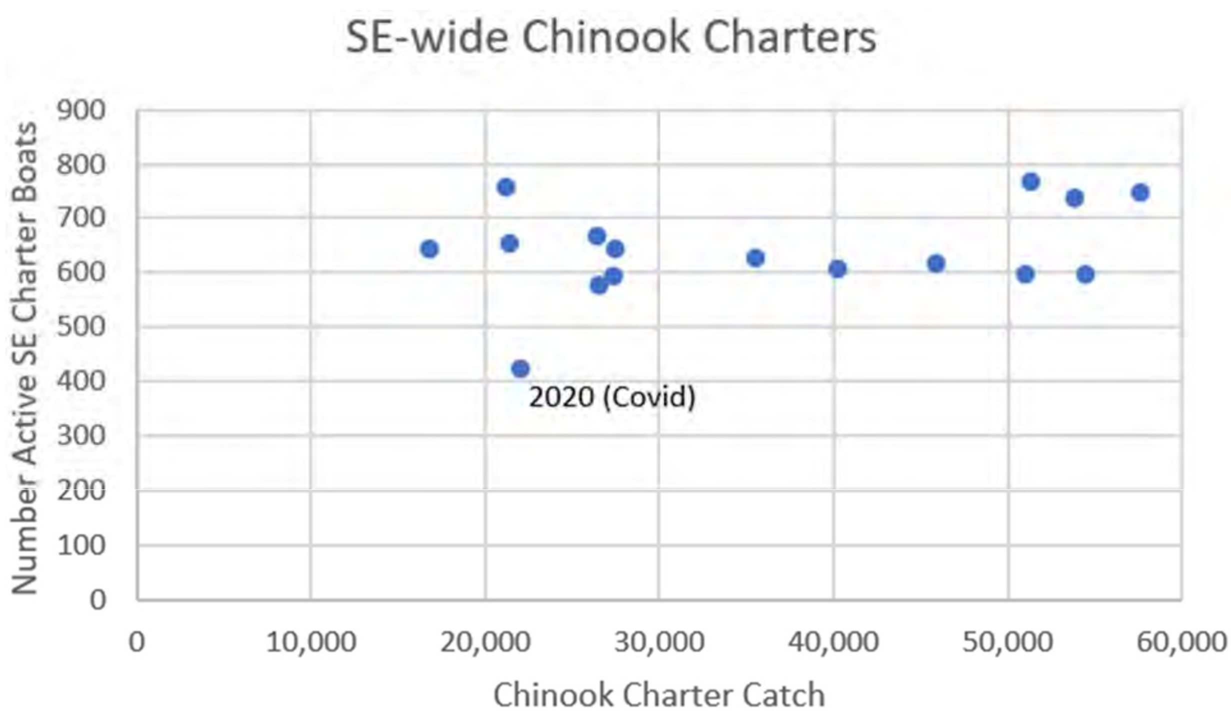
The number of active charter boats in Southeast in any given year has been entirely independent of the sport king quota since at least 1999. Whether the sport quota is 25,000 or 80,000 kings makes no apparent difference in the number of charter boats.

It isn't that these charter boats are making few trips or fishing with fewer client either. Southeast Alaskan fisheries are desirable for many reasons, so plenty of people want to come to go fishing regardless of the king salmon abundance. This is seen below. Just as the number of active charter boats doesn't drop off when sport king quotas are low, neither does the non-resident fishing effort.



This lack of trend remains even if one focuses exclusively on charter-caught king salmon and ignores kings caught by residents on their own boats and by rental boat clients.

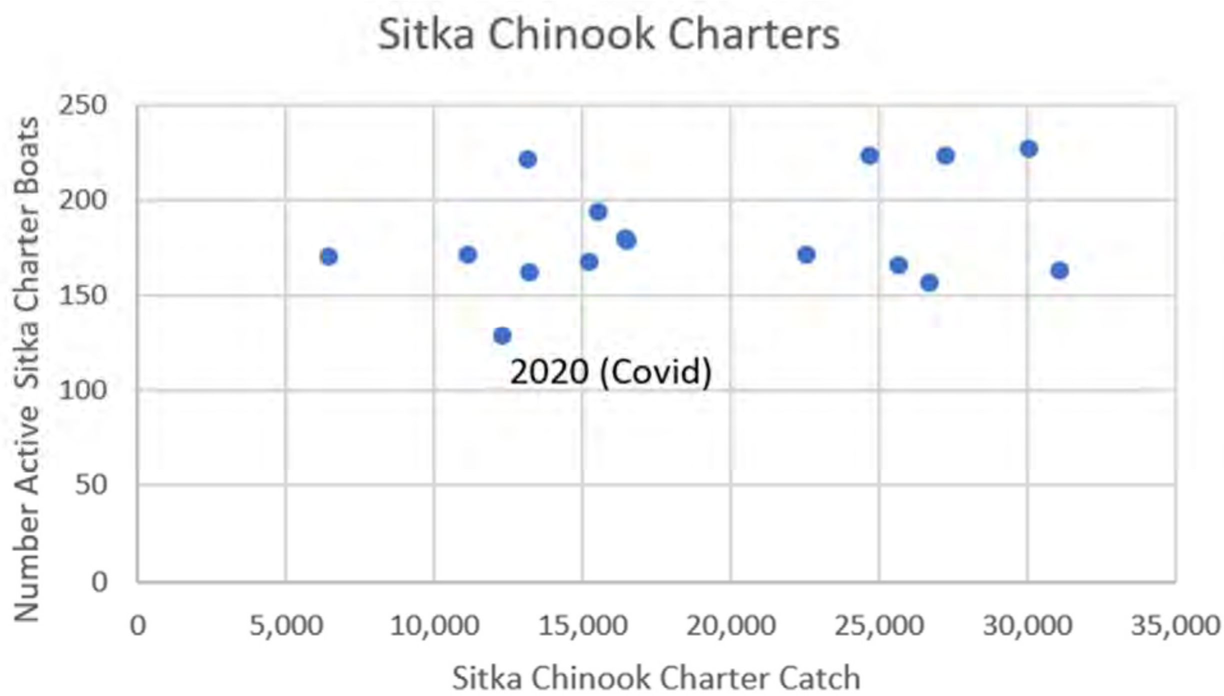
The tables below are derived from the Overview of the Sport Fisheries for King Salmon in Southeast Alaska through 2020 RC 3 Tab 3 tables 9 & 13

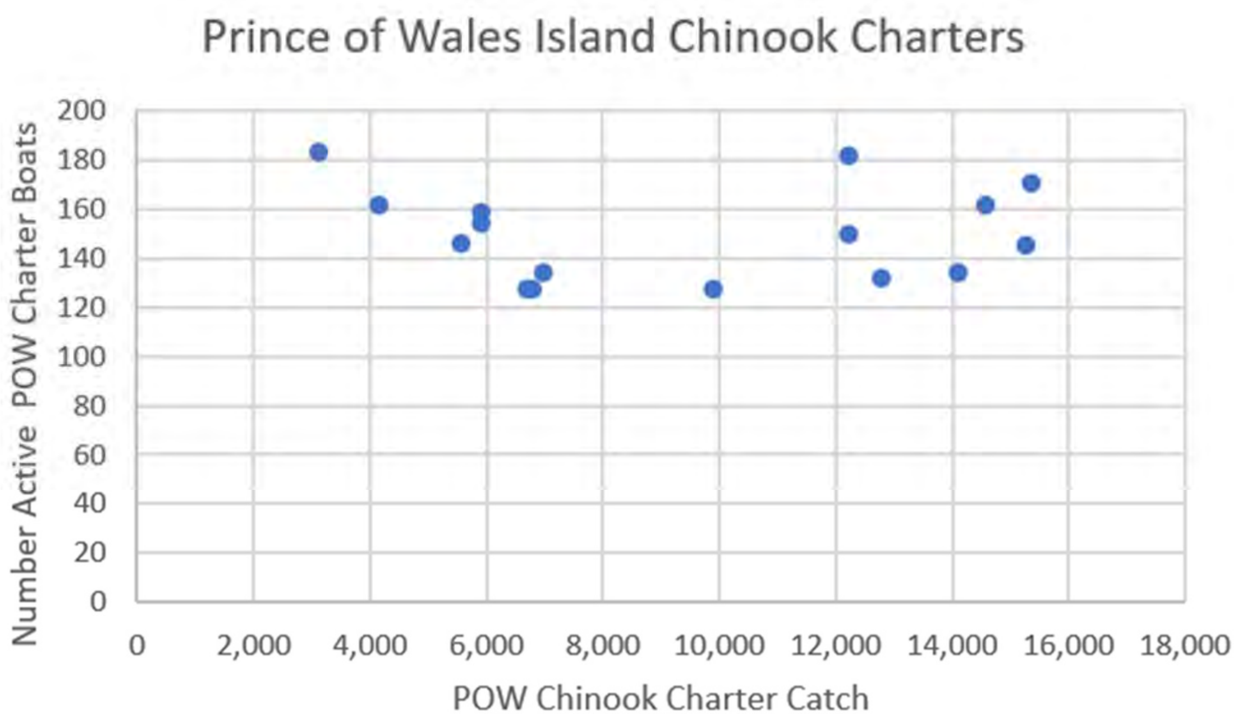


With the exception of 2020, the SE charter fleet has shown remarkable stability. They consistently field between 580-770 boats whether they catch 17,000 kings or 57,000 kings.

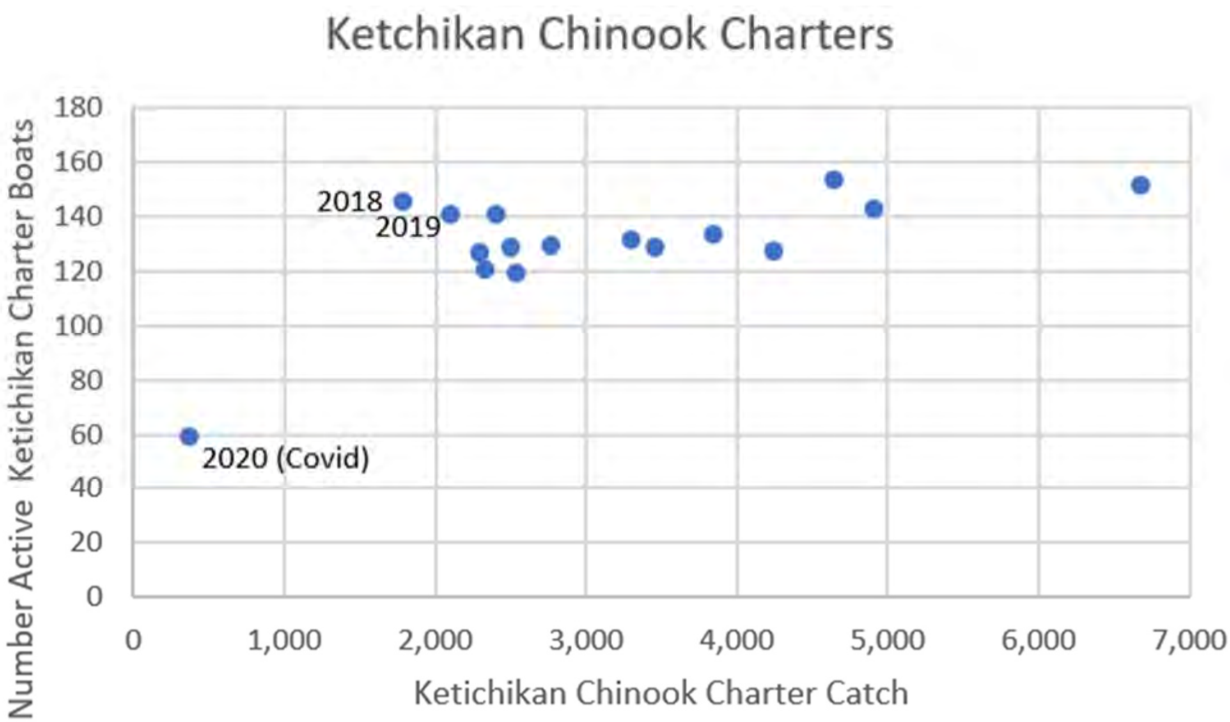
Not only is the overall SE charter fleet stable over a wide range of Chinook catches, but there is no major SE port where the size of the active charter fleet has been correlated with the number of Chinook caught. For instance:

The Sitka charter fleet catches more kings than any other port's boats, but despite being primarily lodge clientele, the size of the Sitka fleet does not vary with their Chinook catch.

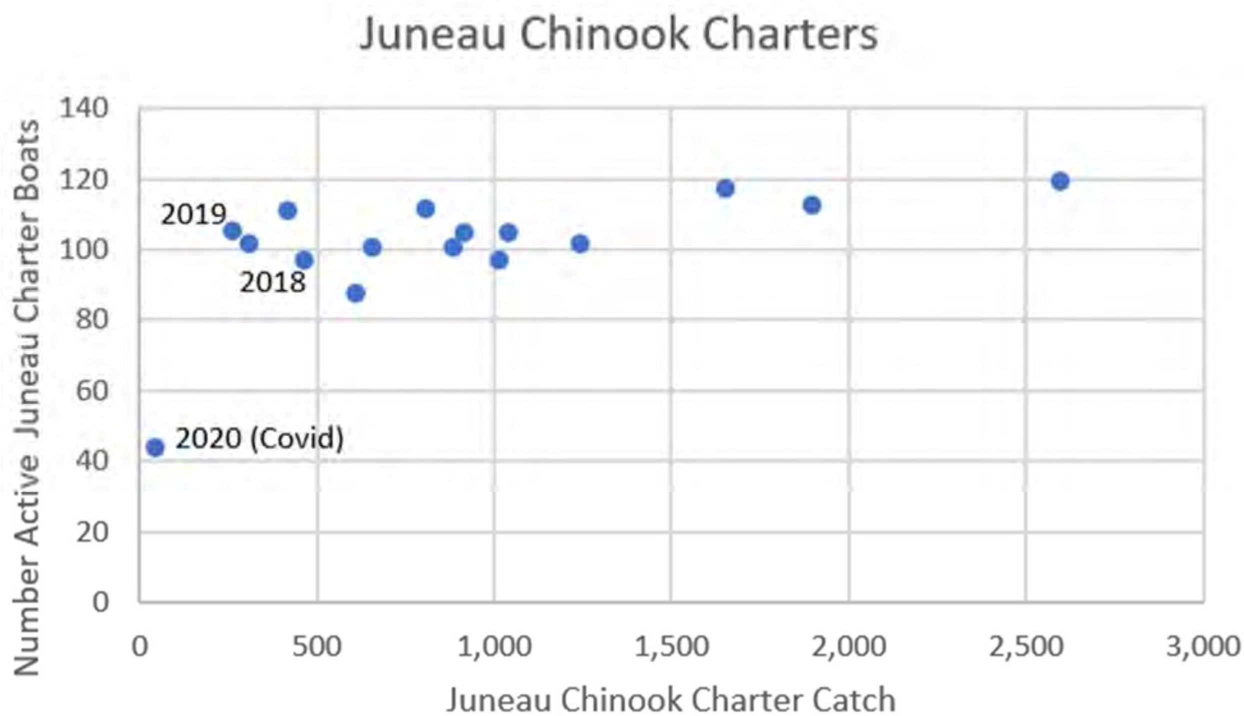




The POW charter boats are also highly dependent on lodge client and they also catch a lot of kings, but their fleet doesn't get smaller when catches are low. In fact, in 2008, the POW fleet was the biggest it has been before or since, yet only 3,099 kings were catch that year- the lowest number of kings caught by POW charter boats in decades.



The Ketchikan charter fleet includes a mix of lodge and cruise ship clients. While Covid hit them hard, they have otherwise been remarkably stable over a wide range of king catches. The Stock of Concern restrictions during the peak of the spawner run in 2018 and 2019 significantly reduced the Ketchikan charter Chinook catch, but these years had among the highest number of active charter boats despite the restrictions.



The Juneau sport king catch was also greatly restricted by the Stock of Concern plan implemented in 2018. However, just as in Ketchikan, the low catches do not correspond to any reduction in the number of active charter boats.

The last 4 graphs have shown a remarkable consistency in the size of the active charter fleet in Southeast Alaska communities. Despite the number of charter kings caught in a community varying by a factor of 5 to 10, in all cases, the number of charter boats remained stable throughout that broad range. Not only does the number of kings vary greatly within the same port from year-to-year, but there is an even greater variation in the annual catch per charter boat from one community to the next.

The community of Juneau maintains a charter fleet of over 100 boats on 9 kings per boat per year. Their operations are conducted simultaneous to Sitka charter boats that average over 100 kings per year. If the 180-ish boat Sitka charter fleet limited their catch to “only” 63 kings per year, this would reduce the sport harvest by over 7,500 kings. Note that 63 kings per boat per year is the average catch for a POW which is the 2nd highest-producing area in Southeast, and is 7 times the number of kings that the average Juneau charter boat catches in a year.

In summary:

- The troll quota has been cut over and over since the early 1980's. At this point, troll Chinook quotas under 150,000 are too small to support the troll fleet and force trollers to tie up their boats for the season. This is supported by recent ADF&G figures.
- There is no historic evidence that the non-resident sport effort declines in years of low sport quotas.
- Neither is there any evident that the number of active charter boats declines in years of low sport quota
- Furthermore, there is no evidence that the Sitka, POW, Ketchikan or Juneau charter operators overall suffer to the point of being unable to maintain their businesses even in years when the local regulations restrict their king harvest to 10-20% of the high years.
- The Juneau charter industry remains viable despite a king catch rate that is less then 10% of Sitka's. If the number of kings being caught actually determined the economic viability of charter operations, Juneau wouldn't have a significant charter fleet and Sitka's would be extraordinarily profitable in even the worst years.