



# Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway

Juneau, AK 99801

Phone: 907-586-6652

Email: [seafa@gci.net](mailto:seafa@gci.net)

Fax: 907-523-1168

Website: <http://www.seafa.org>

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March 28, 2018

North Pacific Fisheries Management Council

Dan Hull, Chair

605 West 4<sup>th</sup>, Suite 306

Anchorage, AK 99501

Dan Hull, Chair and NPFMC Members,

RE: C6 – GOA CV Chinook PSC Limit Adjustments – Initial Review

Southeast Alaska Fishermen's Alliance (SEAFA) **supports Alternative 1 - the status quo for this action on the GOA CV Chinook PSC Limit Adjustments.** As the analysis points out the status of most Chinook stocks are not healthy coastwide. We appreciate the information provided on the status of chinook stocks and providing the minimum restrictions to be implemented in the Board of Fish action plans. In addition to the information provided, Canada has agreed to additional restrictions<sup>1</sup> this year, and restrictions for the Pacific Northwest salmon fisheries are working their way through the Pacific Council process but it is possible that there will be no salmon fisheries in Oregon for recreational or commercial. In a press release issued by ADF&G March 29<sup>th</sup> **Restrictions Coming in 2018 to Southeast Alaska Chinook Fisheries**, it said, "Southeast Alaska and transboundary-river Chinook stocks are experiencing a period of very low productivity," said Deputy Commissioner Charlie Swanton. "Escapement objectives are not being met, so we're calling for an **all-out conservation effort**<sup>2</sup> on behalf of Alaskans and our Canadian neighbors alike." The same press release also states, "As a result of meetings between Alaska and Canada Pacific Salmon Commissioners, Canada has agreed to share the Chinook conservation burden. Reductions in Canada could include time, area, bag limit, and gear restrictions to sport and commercial fisheries. An allowable catch reduction and non-retention are also being considered<sup>3</sup>." The Council analysis on page 74 sums up the effect

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<sup>1</sup> <https://www.thenorthernview.com/news/dfo-contemplating-sweeping-north-coast-salmon-fishery-closure/>

<sup>2</sup> Emphasis added

<sup>3</sup> <https://www.thenorthernview.com/news/dfo-contemplating-sweeping-north-coast-salmon-fishery-closure/>

of management restrictions by saying, “These restrictions have resulted in significant forgone effects across coastal and interior Alaska communities.”

The Council analysis describes the impacts of the action alternatives in qualitative terms and states that these impacts are justified by the fact that annual Chinook PSC levels vary widely and without a predictable trend (Table 74), so neither the status quo PSC limits nor the modified limits considered under the action alternatives guarantee that a fishery will be curtailed or fishing behavior will be modified in any year. In other words, the direct effect of the action alternatives is a **reduction in the likelihood**, all else equal, that the GOA non-pollock trawl CV fisheries will be closed by Chinook PSC in any given year. With the current status of Chinook salmon, the downstream directed users being affected by more restrictive management measures, Alternative 1 – Status Quo provides the best use and protection of Chinook Salmon throughout its range, **balancing** National Standards 1 (optimum yield), 2 (best science), 3 (management units), 8 (community considerations) and 9 (bycatch minimization).

Thank you for considering our comments and the effects all users of Chinook are facing at this time.

Sincerely,

A handwritten signature in black ink that reads "Kathy Hansen" followed by a long horizontal line extending to the right.

Kathy Hansen  
Executive Director