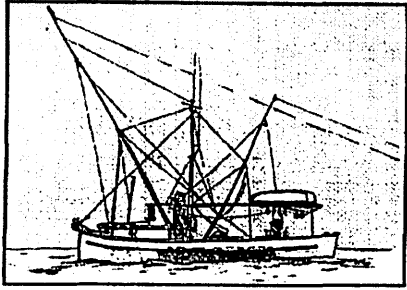


PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-3 SALMON FMP

| NAME (PLEASE PRINT) | TESTIFYING ON BEHALF OF: |
|--|--------------------------|
| <input checked="" type="checkbox"/> 1 George Hutchings | F/V Hickory Wind |
| <input checked="" type="checkbox"/> 2 Dale Kelley | Alaska Trollers Ass'n |
| <input checked="" type="checkbox"/> 3 Greg Gabriel | UCIDA |
| <input checked="" type="checkbox"/> 4 Paul A. Shadura II | Kenai Pen. Fish. Assoc. |
| <input checked="" type="checkbox"/> 5 STEVE TVENSTRUP | UCIDA |
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.



Alaska Trollers Association

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December 9, 2010

Chairman Eric Olson
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, AK 99501-2252

Dear Chairman Olson and Council Members:

The Alaska Trollers Association (ATA) represents hook and line salmon fishermen who fish in state and federal waters off Southeast Alaska. The troll fleet is directly affected by the terms of the *Fishery Management Plan for the Salmon Fisheries in the US EEZ off the Coast of Alaska* (FMP).

ATA has been involved in the FMP since its inception and is familiar with the host of other international, national, and state laws that impact our fishery. ATA is concerned about the ramifications of new Magnuson-Stevens Act (MSA) requirements to impose annual catch limits (ACL) and accountability measures (AM) for salmon, which are very different than most other fish managed by the Council. ATA strongly believes that Alaska's robust salmon management program is most appropriate for the ongoing management of our fishery, as it provides the best set of tools and oversight to achieve the goals of the national standards embodied in the MSA.

ATA fully supports ongoing deferral of salmon FMP management authority to the State of Alaska and urges the Council to find the means to provide for this arrangement into the future. We believe the state has lined out a strong case as to why state management provides a reasonable and responsible 'alternative approach' to ACL's and AM's, as allowed under MSA.

We recognize that several other options have been outlined by state and federal staff, which could be eventually drafted into alternatives for a broader public discussion. We will reserve specific comments on those options until we better understand the intent and implications to our fishery and others.

On December 8th, the Advisory Panel discussed formation of a stakeholder panel to discuss this matter. While it is not yet clear what the goals and objectives might be for such a panel, ATA is willing to participate. Given our history with the FMP, and the direct relationship that already exists between the FMP and our fishery, we request that ATA be included should a group be convened.

We look forward to working with the Council and agencies as this matter progresses. Please don't hesitate to contact me if ATA can be of assistance in any way.

Best regards,

Dale Kelley
Executive Director

The Council directs staff to initiate analysis of updates to the Salmon FMP based on the following draft problem statement, alternatives, and options.

Draft problem statement:

Although the North Pacific Fishery Management Council's *Fishery Management Plan for the Salmon Fisheries in the United States Exclusive Economic Zone off the Coast of Alaska* (Salmon FMP) has been amended nine times in the last two decades, no comprehensive consideration of management strategy or scope of coverage has occurred since 1990. State fisheries regulations and Federal and international laws affecting Alaska salmon have changed since 1990 and the reauthorized Magnuson-Stevens Fishery Conservation and Management Act (MSA) expanded the requirements for FMPs. The Council recognizes that the Salmon FMP is vague with respect to management authority for the three directed commercial salmon fisheries that occur in the EEZ west of Cape Suckling. The Salmon FMP must be updated in order to comply with the current MSA requirements, and it should be amended to more clearly reflect the Council's desires with regard to the State of Alaska continued management authority over commercial fisheries in the West Area EEZ, the Southeast Alaska (SEAK) commercial troll fishery, and the sport fishery.

Updating the Salmon FMP in the West Area EEZ to include pre-season stock status determination criteria and exploitation rate based annual catch limits through the Council process as described in NS-1 guidelines would not be appropriate for Alaska salmon fisheries given the unique characteristics of salmon biology, the state's escapement-based management strategy for salmon, and current state abundance-based inseason management approaches which have been applied for many years and historically have sustained high yields. The same concerns would apply in establishing annual catch limits in SEAK. The distinction between the East and West Area EEZ's needs to be retained due to Pacific Salmon Treaty and Endangered Species Act issues associated with the SEAK salmon fisheries.

Alternatives: Area of application

- Alternative 1:** No action, no changes to the FMP.
- Alternative 2:** Maintain the existing geographic scope of the FMP and update the FMP.
- Alternative 3:** Modify the FMP to specifically exclude three historical net commercial salmon fishing areas in West Area EEZ from the FMP and update the FMP.
- Alternative 4:** Maintain the FMP in the East Area EEZ only and update the FMP.

Applicable to Alternatives 2-4: In areas where the Salmon FMP applies, management under any alternative would be deferred to the State of Alaska.

Component: FMP updates

Develop options to update the Salmon FMP to meet the MSA required provisions in section 303(a) for an FMP, using existing state salmon management to the extent possible.

ACL/AM options (not mutually exclusive):

- Option 1: Use the NS-1 exception for stocks managed under an international fishery agreement with regard to ACL/AM requirements for Chinook salmon harvests under the Pacific Salmon Treaty.**
- Option 2: Use the State's salmon management program as an alternative approach to satisfy MSA requirements.**