



Alaska Trollers Association

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Glenn Merrill
Assistant Regional Administrator
ATTN: ELLEN SEBASTIAN
Sustainable Fisheries Division
Alaska Region NMFS
709 West 9th Street, Room 420-A
Juneau, AK 99801-1807

RE: RIN 648 - BB77 Proposed rule to implement Amendments 12 to the Fishery Management Plan for Salmon in the EEZ off the coast of Alaska (FMP).

Dear Mr. Merrill:

The Alaska Trollers Association (ATA) has reviewed *Amendment 12 to the Fishery Management Plan for the Salmon Fisheries in the EEZ off the Coast of Alaska (FMP) and the associated environmental assessment*. The draft FMP and EA provide a good overview of the troll fishery, management structure and rationale. **ATA supports Amendment 12 as it relates to the East Area EEZ.**

General Comments

ATA represents commercial hook and line salmon fishermen who operate in both state and federal waters off Southeast Alaska. Only the troll fishery has been directly managed under the salmon FMP. The troll fleet is composed of both power and hand trollers fishing between 2 and 6 lines. Vessel size can vary from 16 foot skiffs to 58' or more. Most trollers clean and ice their catch, but a small component of the fleet freeze salmon at sea. Federal waters are very important to the conduct and success of our fishery.

Salmon fisheries in our region are managed on stocks that range from the Pacific Northwest to Alaska. Therefore, the health and well-being of Pacific salmon – and how they are managed coastwide – is something our members take quite seriously. It is therefore important to ensure that all fishing is sustainably regulated in the EEZ, and that state and federal laws are harmonized wherever jurisdictions overlap.

ATA appreciates that the Council and NOAA have focused on continued deferral to the state regulatory structure in general, and the Southeast management program in particular. ATA has worked closely with the state to hone an intricate management plan that balances the needs of both fish and our industry. As the decisional documents reveal, the troll fishery is heavily managed and there is no need to further encumber the fleet with new rules, or saddle the Council and agencies with additional tasks.

West Area EEZ

ATA has refrained from commenting on Amendment 12's treatment of the West Area EEZ, since we are relatively unfamiliar with those fisheries. However, an obvious question is whether it's appropriate to lump all three Westward areas into one, or even to consider the East and West EEZ under one FMP, particularly given substantial differences between fisheries and circumstances. Additional questions and concerns have been raised by some of the affected fisheries representatives in the West Area. Hopefully NMFS and the Secretary will give their input adequate consideration, even if it means extending the time needed to deliberate and act upon the FMP. However, we request that should this happen, provisions be made to ensure that such a delay would not negatively impact the current federal deferral to state management, nor otherwise put at risk East Area EEZ troll and sport fisheries.

East Area EEZ

ATA has been involved in the FMP since its inception and is also quite familiar with the host of other international, national, and state laws that impact East Area EEZ fisheries. We are concerned about the ramifications of imposing new Magnuson-Stevens Act

(MSA) requirements, like annual catch limits (ACL) and accountability measures (AM), on a species like salmon, which is very different than other fish managed by most of the Councils. We believe the state has lined out a strong case as to why its management system provides a reasonable and responsible 'alternative approach' to ACL's and AM's, as allowed under the MSA.

The state's abundance based program relies on vigorous reporting, inseason assessments, and escapement goal management. This allows fishery managers to react to annual variations in abundance, while in most years also ensuring a successful harvest. Fishery scientists and managers are working hard to complete the research and define peer reviewed MSY goals, where appropriate, for the many salmon streams in our region; they have successfully accomplished this task on key indicator systems. New information is constantly being added to the body of data that guides annual management plans. In addition, the state works with the industry during the season to gather real time information and ground-truth the data they receive. The health of the salmon found in Southeast and our fisheries is a testament to the state's methodology and cooperative approach. We encourage the Council to embrace ADFG's program in the East Area EEZ, particularly when establishing the status determination criteria intended to achieve National Standard 1.

As you know, trollers are subject to an intricate management program. While fewer fish are landed in the EEZ than in state waters, you can see that those fish make up a significant portion of many trollers earnings. It is important for the stability of our fleet and local fishing communities that the Council work to avoid additional, unnecessary, rules that could disrupt fishing patterns. We believe the existing state management program offers the best system to protect both salmon and salmon fisheries. Amendment 12 attempts to secure this system in the East EEZ, and therefore garners our support.

Economic Impacts

The Alaska troll fleet ranks among the largest on the West Coast. 85% of troll permit holders are resident Alaskans and most live in small communities in the Southeast region, or East EEZ.

In 2011, troll permits made up 11% of all Alaska permits fished - for all commercial species. In addition, 11% of the state's resident commercial permit holders who fished were trollers; who, in turn, employed 4% of all Alaska deckhands. In addition to fishing, the support jobs generated in the processing and private business sectors, state and federal agencies, and USCG provide important economic opportunity throughout the region and state.

Trollers are known for delivering a premium salmon product to market and the ex-vessel value of troll caught salmon is typically much higher than the statewide average. In 2006 the troll fleet was responsible for 9% of Alaska's total salmon revenues and contributed about \$1 million in raw fish tax to the state general fund, which was shared with the communities. Preliminary estimates show an ex-vessel value of \$28.3 million for the 2011 troll harvest, and a 10-year average of \$25 million per year for both state and federal waters. This does not account for the impact of those dollars as they circulate through the local economy.

The EA reveals a lack of data on sportfishing and indicates that very little sportfishing occurs in the East Area EEZ, which is true. Therefore, some of the sportfish economic data provided was puzzling and we question its relevance. These data were adjusted by economic multipliers, in stark contrast to the ex-vessel values offered for the troll fishery. There is no question that the guided sportfish industry is of high economic importance to Southeast Alaska, and the information provided makes that point. However, we encourage NOAA and all other agencies to use a better 'apples to apples' standard when providing estimates of economic value.

In conclusion, **ATA fully supports ongoing deferral of salmon FMP management authority to the State of Alaska through the East Area EEZ portion of Amendment 12.** Alaska's robust salmon program is most appropriate for the ongoing management of Southeast fisheries. The process is dynamic and proven; providing the best set of tools and oversight to achieve the goals of the national standards embodied in the MSA. We hope you agree and will work to ensure that the conduct of the Southeast fishery does not change as a result of revising the FMP.

Please don't hesitate to contact me if I can be of assistance on this or other issues of concern to the Alaska fishing industry.

Best regards,

Dale Kelley
Executive Director