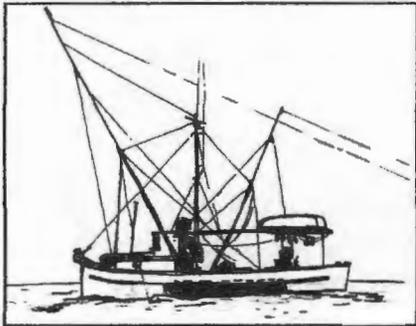


RC 86
Submitted by USAA



Alaska Trollers Association

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December 1, 2014

Southeast Joint Regional Planning Team
c/o Garold Pryor
Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

RE: 2015 Hatchery Allocation Board of Fisheries Proposals

Dear RPT Members:

It appears that you may be considering allocation proposals 175 & 176 during the December Regional Planning Team (RPT) meeting in Petersburg. This is to inform you that Alaska Trollers Association (ATA) opposes both of those proposals and requests that you do so as well.

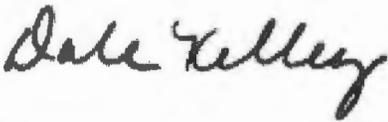
Proposal 175 seeks to reconvene the Southeast Alaska Allocation Task Force to review the Southeastern Alaska Area Enhanced Salmon Allocation Management Plan (5 AAC 33.364). While the troll fleet has chronically lagged behind under the current allocation plan, we do not support re-opening the plan for review. At this point in time, doing so would be an unnecessary expenditure of time and monetary resources. The reasons that have thus far prevented the troll fleet from reaching its allocated percentage are many and varied. The RPT and individual operators have been working hard to find the right mix of solutions to address the problem. There are a number of new and expanded projects set to come online over the next several years, which could positively impact the troll fleet's hatchery allocation percentage. Therefore, ATA prefers that the RPT continue to work within the parameters of the current allocation plan, in hopes of achieving the goals originally established for all of the Southeast commercial fleets.

Proposal 176 would require NSRAA and DIPAC to develop annual hatchery harvest plans with the intent to achieve the goal of reducing the current troll allocation underage by half over the next 5 years, and completely correct the imbalance by 2024. These plans would have to be approved each year by the Board of Fisheries. ATA is concerned that the proposal might not have the desired effect without significantly disrupting other fisheries. ATA encourages all

operators to manage hatchery production and harvest with intent to achieve allocation goals. However, we also believe that it is important to allow hatchery boards the latitude to problem-solve and make decisions based on their unique circumstances. Requiring annual management plans to be developed by date certain, with subsequent Board of Fisheries approval, would create additional workload for the Board and remove important flexibility that our associations need to achieve their many goals and objectives. The RPT and Board of Fisheries' policies and processes allow for periodic review of production, management provisions, and hatchery outcomes - including allocation. ATA prefers to work with the other gear groups to find solutions within the existing system.

Thank you for considering ATA's point of view. Please don't hesitate to contact me if I can provide additional information on this or other issues of concern to the troll fleet.

Best regards,

A handwritten signature in cursive script that reads "Dale Kelley".

Dale Kelley
Executive Director