

Alaska Trollers Association

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December 27, 2010

Karl Johnstone, Chairman
Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposal 69

Dear Mr. Johnstone and Board Members:

I am writing to inform you of the Alaska Trollers Association's (ATA) opposition to Proposal 69, which seeks to establish a troll fishery in the Kodiak management area.

ATA represents hook and line salmon fishermen operating in both state and federal waters off Southeast Alaska. Our members are committed to maintaining access to high quality Alaska salmon for consumers worldwide. There are over 2000 hand and power troll permits active in Alaska and about half are fished each year. The troll fleet is 85% resident and roughly 40% live in rural communities. Vessels range in size from 14' skiffs to vessels up to 60'.

Ironically, every troller in Alaska currently holds a *statewide* permit card and for the majority of the fleets' 130 year history trollers were allowed to fish in most all regions. ATA tried for many years to re-establish the troll fishery west of Cape Suckling, which was closed for conservation purposes in the mid-70s and remains closed today due, in part, to allocation concerns expressed by a variety of fishing interests.

For a great many years, both the Alaska Department of Fish and Game and the Alaska Board of Fisheries have insisted that the troll fishery remain limited to the Southeast region due to complications that could erupt within the Pacific Salmon Treaty arena. The US/Canada Salmon Treaty was signed in 1985 and includes a provision mandating no 'new or redirected' fisheries. Since trolling statewide was a pre-Treaty endeavor, we are told that re-opening the troll fishery West of Suckling would constitute a violation of the commitments made by, and between parties within, the United States. To say the least, this has been a disappointment, and the situation would be further aggravated if the state now chose to allow a select group of fishermen the opportunity to troll in areas closed to our fleet.

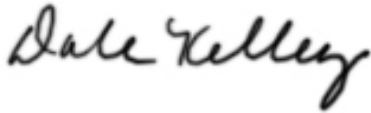
Makers of the proposal suggest limiting this fishery to coho only, during times when Gulf of Alaska Chinook spawners have passed through Kodiak fisheries. However, the concept side-steps the fact that a mix of feeder kings, from a variety of areas, is known to be present in the area year-round.

Another issue of concern is the matter of allowing Kodiak fishermen to switch their permits between gear types, as opposed to buying a separate troll permit. There are more than 2000 troll permits in Alaska – many unused -- why add more? If this fishery is allowed to open, then existing troll permit holders should be free to fish the area, and/or sell their permits to willing buyers. ATA simply can't support such permit conversions and what, in effect, is super-exclusive registration.

ATA appreciates that other fishermen are interested in accessing under-utilized species, improving the quality of their landed catch throughout part or all of the season, and adding more troll product to the market. In fact, we would like to see our own fleet spread out to other regions to accomplish the goals of superior quality and increased access and opportunity for all of Alaska's salmon fishermen. Unfortunately, the current political climate for West Coast salmon fisheries is not conducive to that notion. Nor does it make sense to establish new, exclusive use opportunities for pocket fisheries, which could negatively impact existing, displaced fishermen who have been prevented from fishing the area in question for the past three decades.

If ATA can be of assistance on this or other issues of concern to our fleet and the commercial fishing industry, please don't hesitate to contact me.

Best regards,

A handwritten signature in black ink that reads "Dale Kelley". The signature is written in a cursive, flowing style.

Dale Kelley
Executive Director