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