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Alaska Trollers Association

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Testimony of Dale Kelley Alaska Board of Fisheries Statewide Meeting Anchorage, Alaska March 2013

Good day! My name is Dale Kelley. I am Executive Director of the Alaska Trollers Association. Our office is located in Juneau.

The theme of several proposals before you is 'uniformity'. But 'one size fits all' rarely works. If it did, I'd be a Sports Illustrated swim suit model. But, I can't fit into Cyndi Crawford's swimwear... and the makers of some of these proposals probably can't fit into mine. Supporters of **216** suggest that managers statewide need more clarity to help achieve escapement goals. **217** was offered by someone who believes that steadily increasing escapement goals will lead to more and bigger Chinook. We've seen ADFG ask for guidance when management plans are unclear or there are road blocks to achieving the Board's goals. Just because Cook Inlet needs direction doesn't mean Southeast does. As for prioritizing Chinook and arbitrarily raising escapement goals -- sometimes a simple solution is best, but in this case it could hurt. All stocks and fisheries are unique and when there is a specific problem, it should be carefully analyzed and the appropriate remedy applied. Please, don't ask our fishery managers to don the wrong swim suit -- the results might not be pretty.

I have been involved in the Board of Fish process for nearly 30 years. I've seen many board members come and go, but rarely have I seen a Board Generated Proposal, until recently. Why is that? Is it just circumstantial, or does the Board intent to start writing more proposals?

There is no question that you have broad authority to develop fishery regulations. Policies and procedures are in place, to use at your discretion, as you work towards the twin goals of conservation and development.

Petitions and Agenda Change Requests allow issues to be raised between meetings, but include side-boards to ensure that only the most critical are granted an emergency hearing; and, emergencies are rarely found to exist.

Some proposals at this meeting failed to meet the ACR litmus test, so you drafted your own. It's worrisome when the Board writes proposals to restrict access, like **247**, especially when the issue was recently vetted. Apparently, 'new information' points to *potential* public safety issues, yet the situation is not described and the affected public is not privy to the video evidence in question, so can't defend themselves. Enforcement will be on the fishing grounds this season, which should defuse safety concerns. Please take a wait and see approach.

Board Generated Proposals should rarely be used, kept narrow in scope, and avoid allocation. It's hard to envision too many situations that demand a Board Generated Proposal over applying the existing, transparent protocols to public proposals.

It's also hard to comment on criteria when there is no problem statement and it's unclear how the policy will be used. Some of the criteria are subjective and redundant. I strongly recommend criteria that better integrate with existing regulation and policy. Perhaps the solution is more surgical, like amending the ACR provisions to include 'public safety' and inclusion of a separate policy statement specifying why, how, and under what circumstances Board Generated Proposals will be used.

We appreciate your taking feedback on these criteria and urge you to develop them with the fishing public, to boost confidence that the Board of Fish will remain a transparent process.

Thank you.