

October 18, 2017

John Jensen, Chairman
Alaska Board of Fisheries
Juneau, AK 99802

Dear Chairman Jensen and Board Members:

Our organizations oppose the Board of Fisheries' (BOF) October 18th decision to convene a task force prior to the Southeast-Yakutat meeting, to make recommendations on the allocation of enhanced and wild salmon under 5 AAC 33.364. Southeastern Alaska Area Enhanced Salmon Allocation Management Plan (Enhanced Salmon Allocation Plan). A proposed charge statement for the task force, submitted by another gear group, was also discussed. We have not seen that document, or the official motion, so don't know if our groups agree with the topics and scope of work. **We request that you reconsider action on the Enhanced Salmon Allocation Task Force.**

Our understanding was that the BOF would simply decide at this meeting if a non-regulatory proposal requesting a task force would be considered at the Southeast meeting. We are unaware of any Southeast task forces being assigned, or even discussed, at previous BOF work sessions. Some gear groups, aquaculture associations, and the Regional Planning Team (RPT) may have been unaware of this proposal; others didn't comment or attend this meeting because they believed there was time to weigh in during the normal Southeast comment period. Moving to appoint and convene this task force during the work session makes it appear the BOF supports adding wild stocks to the enhanced salmon plan and effectively circumvents the public process.

In 1991, the BOF asked Northern Southeast Regional Aquaculture Association (NSRAA) and Southern Southeast Regional Aquaculture Association (SSRAA) to develop a plan to allocate enhanced salmon. Chairman Martin was quite specific in limiting that request to hatchery fish. NSRAA and SSRAA established the Southeast Allocation Task Force (SATF), which ultimately submitted proposal #329 for deliberation and action during the 1994 BOF meeting (BOF Finding 94-148-FB). The SATF worked for three years to develop an allocation plan for enhanced fish, period - the regulation was never intended to address wild stocks.

Neither ATA or SEAS support adding wild stocks to the **Enhanced** Salmon Allocation Plan. Wild stocks were not included when the regulation was enacted and we see no merit in amending the plan to include them now. Wild salmon stocks are fully allocated in Southeast and there are several plans already in place to share wild fish among the fleets – how will adding these stocks to the Enhanced Salmon Allocation Plan impact current wild stock allocations? Will all wild stock allocation plans now be subject to BOF action at the Southeast meeting? Shouldn't the public have been allowed to speak to those issues before the BOF voted to approve a task force to develop allocative recommendations for both enhanced and wild stocks? There is already a proposal slated for the Southeast meeting where this issue, and the question of a task force, could be properly vetted with the public, so why is the BOF acting now and outside of the region?

We take exception to the BOF assumption that the entire industry desires a task force aimed at merging the allocation of wild and enhanced salmon. As the groups representing the two fleets that have chronically been under the enhanced allocation, we should have some say about whether the plan should be revamped and what process should be used to do so, particularly since we would have to expend time and money we did not budget to help get the job done. This issue can be highly contentious, even without the addition of wild stocks, and there is

limited time and resources for organizations and individuals to adequately review regulations, data, and policy, and participate in a meaningful way.

During today's deliberations we learned another Southeast gear group submitted as background a discussion paper on the hatchery program. The public has not seen it, but we suspect it is some variation of a draft document written by NSRAA staff at the request of the RPT. The first draft was discussed by industry and the hatchery operators, but **the RPT has not yet approved the document**, because several gear groups cited errors and omissions that need correcting to provide information and context for the reader. In addition, the last draft our organizations reviewed included conclusions and recommended actions submitted by individual gear groups. Those sections are viewed by many as perception; non-historical, not broadly supported by industry, and having no place in a retrospective document on the Southeast hatchery program. We are aware of only one gear group that supported the draft as written and are shocked that the document might have been submitted in this way.

The Enhanced Salmon Allocation Plan formula is a covenant that the hatchery operators and industry strive to achieve. We are concerned about any action that would reduce the RPT's ability to develop appropriate enhancement and allocation plans for the region. For the last 10 years, the decisions the RPT has made regarding existing facilities and increased production has hinged on if they would help or hinder correction of the enhanced salmon allocation imbalance. Several innovative programs were recently established to better distribute hatchery fish amongst the gear groups; many of those fish are already in the water; but adult returns have not been fully realized. To overhaul the allocation plan and add "wild" fish to the formula now, without first assessing the impact this added production will have on solving the imbalance, will just create new and additional strife.

In conclusion, we ask that you reconsider your action on the Enhanced Salmon Allocation Task Force. The task force proposal is not supported by all gear groups and has been acted upon prematurely by the board. The affected public hasn't seen the motion and charge statement that were passed, nor have they agreed to the problem statement - much less the goals and rules of engagement. The timeframe for this task force is inadequate to conduct a thorough review of data and information relevant to the many issues involved in this historically complex and contentious matter. Therefore, we believe that a task force is unlikely to achieve a beneficial outcome for our region, particularly in time to be considered at the January meeting.

If we can answer any questions on this matter, please don't hesitate to contact either of us by phone or at the meeting.

Best regards,

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