

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

DATE: _____

I wish to testify on:

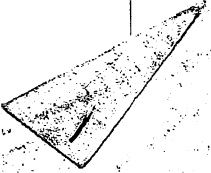
AGENDA TOPIC: TROLL SALMON

AGENDA Numbers: A 1

Time required for presentation: 5-10 min.

NAME: Scott Starnes

MAILING ADDRESS: 2208 NW Market, Seattle



The first part of the document
 discusses the importance of
 maintaining accurate records
 and the role of the
 committee in overseeing
 the process. It also
 mentions the need for
 transparency and
 accountability in all
 actions taken.

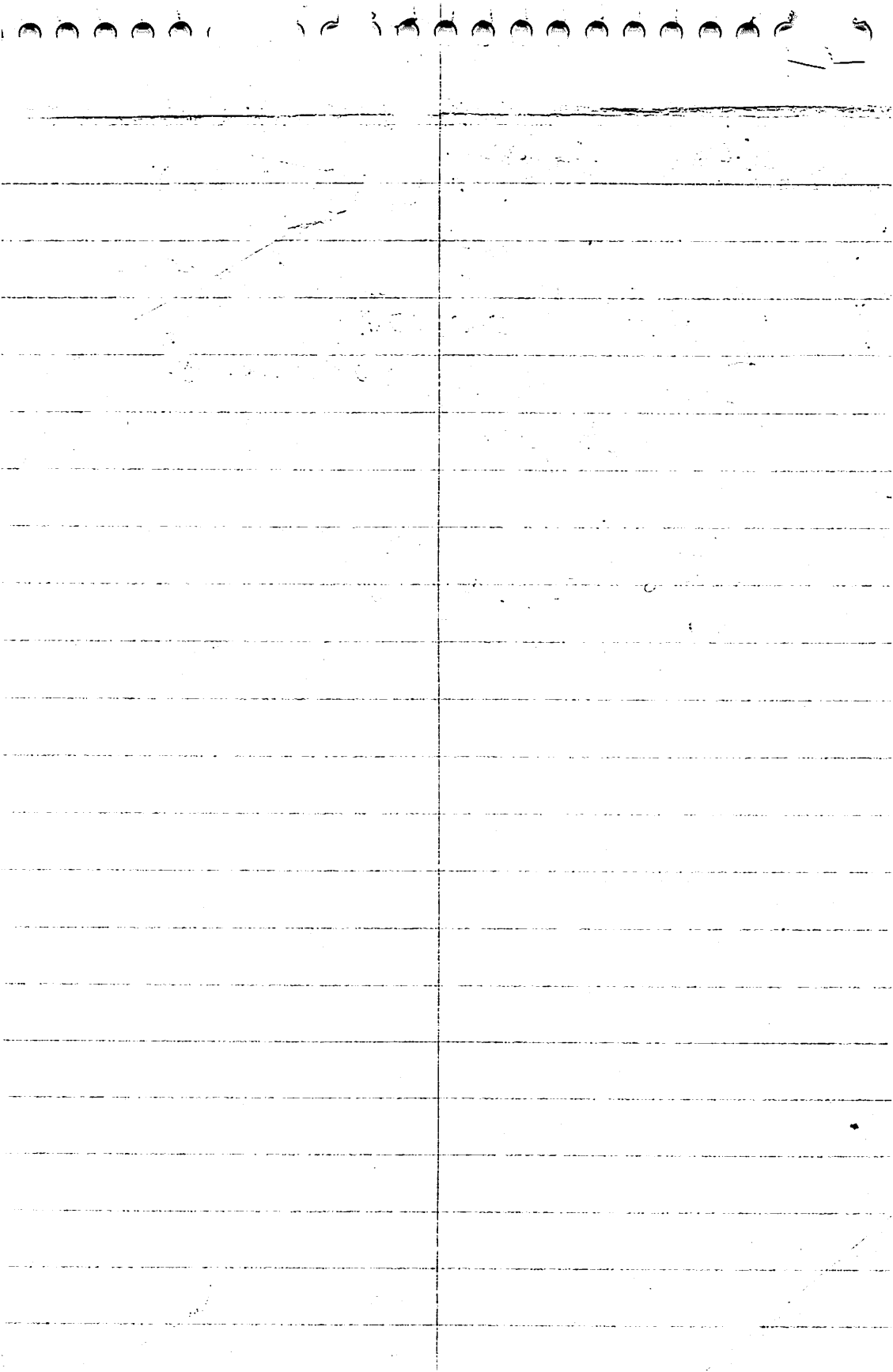
Alex Heindl

Co-chair Inter Tribal Fish
Commission

83 83 NE Sandy Blvd #320
Portland OR 97211

Salmon discussion
paper

ltr from Jutzell
to Tillini




Agenda Item G-4
March, 1980

MEMORANDUM

DATE: March 21, 1980

TO: Council Members, Scientific & Statistical Committee
and Advisory Panel

FROM: Jim H. Branson, Executive Director 

SUBJECT: Troll Salmon Fishery Management Plan

ACTION REQUIRED

Adopt a course of action for the 1980 Troll Salmon Fishery in the FCZ and comment on the issues raised concerning our proposed amendment.

BACKGROUND

The review of our 1980 amendment to the Troll Salmon FMP has raised some questions to which Terry Leitzell has asked for further guidance from the Council. In his March 17th letter to the Council, (Attachment 1) Leitzell acknowledges that the chances of the hand troll ban being approved are not very good. A broader concern of the letter, however, questions the extent to which the FMP as amended would be administered to recognize the depressed state of certain individual chinook salmon stocks. The letter requests further advice from the Council as to whether it would support implementation of the amended FMP by NMFS and ADF&G in a manner that would take special account of the depressed state of individual chinook stocks originating both in Southeast Alaska and in Washington and in Oregon.

Representatives from the Alaska Department of Fish and Game, the Washington Department of Fisheries, Oregon Department of Fish and Wildlife, the National Marine Fisheries Service and the Council met in Juneau on March 19th to discuss this letter and the questions it raised. I have developed a SALMON DISCUSSION PAPER which lays out the 'courses-of-action' available to the Council on this matter.

We also learned that the environmental assessment submitted supporting the amendment was judged inadequate and inappropriate and a supplemental environmental impact statement has been requested. Pat Travers, General Counsel/Alaska, has responded that the supplemental EIS might address the implementing regulations rather than the relatively minor amendment changes to the FMP. Pat has also recommended that NMFS prepare this EIS and coordinate the special nature of it with EPA and CEQ.

Attachment:

SALMON DISCUSSION PAPER (3-20-80)

MIH

March 20, 1980

JHB

SALMON DISCUSSION PAPER

This paper discusses the courses of action available to the Council and their probable consequences if the amendment to the Salmon FMP is disapproved by the Secretary, as it appears that it will be. We can certainly expect that the ban on handtrolling will be disapproved. Two basic courses of action appear possible, do nothing and let the plan expire, or follow DOC's recommendations and request that management of the fishery in 1980 be aimed at a specific chinook catch somewhere within the OY range now in the FMP, which is 286,000 to 320,000 fish (the troll catch in 1979 was approximately 335,000 fish, total chinook catch, including incidental catch in net fisheries was 360,000 fish).

I. Let the Plan Expire

Two courses are then possible, of which 'b,' Secretarial amendment, is almost sure to be the one taken.

- a. Management would revert to the State of Alaska for the entire troll salmon fishery.
 - (1) There could be an expansion of effort in the FCZ by non-Alaska registered trollers delivering their catches outside of Alaska. The magnitude of the possible expansion is not known but could be fairly large since there will be a six-week closure in the west coast troll fishery at a period when there are very few alternative fisheries for the large freezer-trollers in that area.
 - (2) The ban on handtrolling offshore would be effective under State of Alaska law.
 - (3) Catch could be controlled by in-season management if resource problems can be identified in a timely manner.

- b. The Secretary could, (and probably would) amend the plan to suit their wishes and continue it in effect through 1980.
- (1) Handtrolling would be allowed outside three miles.
 - (2) Significantly reducing the catch of chinooks would probably require curtailment of the entire offshore fishery for most or all of the season. The need and timing for closures based on landing reports would be extremely difficult to determine because we could expect that there would be wholesale misreporting of the area of catch if the trollers know that there will be a ceiling on the offshore catch.
 - (3) Any unilateral closures of the FCZ would move more effort inshore with consequent severe impact on Alaska stocks of chinook and coho.
 - (4) Alaska would probably be forced into further inside closures to compensate for the shift of effort from offshore to inshore waters.
 - (5) Would eliminate the possibility of additional pressure from non-Alaska registered trollers.

II. The Council Responds positively to the Request From the Secretary to Restrict the Chinook Catch by Indicating They Want In-season Management to Hold the Southeast Alaska Chinook Catch at Some Point Within the OY Range in the Current FMP (286 to 320,000 fish)

- a. Any in-season measures taken under the Council's request should be augmented by similar action by the State of Alaska to close at least the surfline/shoreline to three mile area or they would not be effective or enforceable. In-season closures of the FCZ only would lead to a situation similar to the one outlined under I.b.(3) because it would force effort inshore. In addition, the practical problem of closing the area from 3 to 200 is much greater than closing the surfline to 200, since much of the fishery is on or very near the 3 mile line.

- b. The drop in the catch from 1979, depending on where the Council asks the Department of Commerce to hold the harvest within the OY range, could range from 40 to 74,000 chinook.
 - (1) An evaluation is needed of the impact of that catch reduction on the trollers and supporting industry.

- c. It could be expected that that lessened effort and catch would effect some savings for various depleted stocks.
 - (1) Using the rather sketchy data available, it appears that a cut of 40 to 74,000 fish from the total troll catch would reduce the catch of Upper-Columbia River fall chinook stocks but it is impossible to determine exactly how much. It is also impossible to estimate what portion of that number saved would survive through one or two more years in the fisheries of Alaska, British Columbia and Washington to finally contribute to the escapement and Indian catch in the upper Columbia.

All, or at least a very large proportion, of the increase in the troll salmon catch in 1979 occurred offshore. The eight-year average (1970 to 77 was also used to compute OY) was 171,000 chinook. In 1979 the catch offshore was 254,000 chinook. A reduction in that catch is obviously required if we are to stay within the objective of the FMP developed by the Council, that is, to stabilize the fishery in an OY range between 286,000 to 320,000 chinook for the Southeast Alaska commercial fishery.

Retyped for easier reading
on 3/19/80

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
Washington, D.C. 20235

March 17, 1980

Mr. Clem Tillion
Chairman, North Pacific Fishery
Management Council
P.O.Box 3136DT
Anchorage, Alaska 99510

Dear Clem,

I have reviewed the amendment package for the Fishery Management Plan for the High Seas Salmon Fishery off the Coast of Alaska (FMP), that was forwarded to me by Jim Branson on February 22, 1980. This review has raised some questions upon which I believe further guidance from the Council to be necessary before I take final action approving or disapproving the amendment. Our review of some of the other provisions of the amendment is incomplete and this letter should not be interpreted as approving measures not discussed herein. The 1980 amendment will probably need a draft Supplemental Environmental Impact Statement. Further guidance on this will be forthcoming.

Initially, I must acknowledge that the chances of the hand troll ban being approved this year are probably not very good. In response to the vigorous encouragement of the Alaska Regional staff, as well as Jim Branson's excellent exposition of the reasoning that underlies the Council's support of the ban, I have reconsidered carefully the conclusion we reached last year that the hand troll ban would violate National Standard 4. I have yet to make a final decision on this matter, but I am currently inclined to adhere to the position we took last year. I recognize that the competing beliefs concerning this issue are deeply rooted, and that disapproval by me of the hand troll ban in light of the Council's repeated expressions of support for the measure is an action of extreme gravity. I can ask only that you understand the sincerity of my belief, reached after careful and lengthy analysis, that I do not have discretion under the FCMA to approve the hand troll ban proposed by the Council.

Perhaps of greater significance than the issue of the hand troll ban are some questions raised by my review of the amendments concerning the extent to which the FMP, as amended, would be administered in a manner that recognizes the depressed state of certain individual chinook salmon stocks. As you are aware, certain of the chinook stocks that are harvested off Alaska are in a depleted, sometimes a severely depleted condition. In the case of some of these stocks originating in Washington and Oregon, the situation is made more urgent by Indian treaty fishing rights, but even in the case of chinook salmon originating in Alaska itself, National Standard 1 plainly requires that special efforts be made to assure that fishing effort in the FCZ does not interfere with the rehabilitation of depressed stocks.

During 1979, the upper limit of the OY range for chinook salmon off Southeast Alaska was expanded by about 7,000 fish by the troll fishery alone. It also appears that fishing effort on chinooks in the FCZ increased substantially during the year. Both of these developments are inconsistent with the avowed purpose of the FMP to maintain a "status quo" with respect to chinooks pending the acquisition of more data on the relationships between offshore fishing effort and the condition of individual chinook stocks both from Alaska and from the Pacific Northwest. These considerations would seem to call for a very conservative management regime during 1980 for chinooks. Such a regime may be within the scope of the FMP as the Council has prepared it.

Both in its current form and as proposed to be amended, the FMP seems to authorize alternative management regimes that permit allowing varying degrees of protection to depleted stocks. The NMFS Alaska Regional Director, in concert with the Alaska Department of Fish & Game (ADF&G), is given broad discretion to close the fishery when the apparent condition of the stocks so warrants. For example, the chinook harvest could be limited to the lower end of the OY range through the exercise of the concerted closure authority of the Regional Director and the ADF&G. In so restricting the harvest, NMFS and ADF&G might, in order to avoid expansion of effort offshore, agree to specify the respective portions of the OY that might be taken in the FCZ and the State waters.

Before taking final action on the amendments, therefore, I would like to request further advice from the Council as to whether it would support implementation of the amended FMP by NMFS and ADF&G in a manner that would take special account of the depressed state of individual chinook stocks originating both in Southeast Alaska and in Washington and Oregon. Any guidance that the Council might provide as to its own consideration of the needs of these stocks and of their users, and any explanation that it might provide concerning management measures within the scope of the FMP as currently proposed that would address these needs, would do much to relieve our concerns about the approvability of the amended FMP.

The staff of NMFS and of the NOAA Office of General Counsel will be available to the Council staff to assist in the consideration of these matters in preparation for the Council meeting of March 26 28. I would encourage close consultation with the Alaska Department of Fish and Game and the Alaska Board of Fisheries as alternatives for a management regime focusing on the condition of chinook stocks are explored. The joint meeting of the Council and the Board that will take place in conjunction with the March Council meeting would be a particularly suitable forum for cooperative exploration of these alternatives. I assure you that we will do all we can to assist the Council in these efforts, and to implement a management regime for the 1980 troll fishery without disruption of the fishing effort.

Enclosed please find a memorandum to the Pacific Council providing guidance on the nature of the Secretary of Commerce's obligation to the treaty tribes of the Pacific Coast. Briefly, the memorandum notes that the Secretary must manage the salmon fisheries in the FCZ in a manner consistent with the treaty obligations of the United States. This obligation applies equally to management of the FCZ waters off Alaska. In this regard, salmon management in the FCZ off Alaska should take into account both the need to conserve the salmon resources of interest to the treaty tribes and the fact that a portion of the salmon harvest off Alaska is by citizens of Washington State. I realize that there is a good deal of uncertainty regarding the impact that the Alaskan harvest has on these salmon stocks, and that you have undertaken a thorough analysis of that impact. I wish to stress the importance of completing and acting upon this analysis as soon as possible.

For the longer term we are encouraged to hear of closer working relationships between the North Pacific and Pacific Fishery Management Council and that there is additional 'lower 48' representation on your High Seas Salmon Plan development team. As we learn more about distribution of salmon stocks it may require the development of a unified coast wide regime that would allow closer coordination among the various U.S. management authorities and their Canadian counterparts.

Sincerely, yours,

Terry L. Leitzell
Assistant Administrator
for Fisheries

Enclosure

STATUS OF SALMON MANAGEMENT AND STOCKS

SSC only

Alaska

The Alaskan ocean troll fishery operates on an ill-defined, complex mixture of chinook and coho stocks which spawn in streams originating in Alaska, Canada, Washington and Oregon.

Troll catches of chinook peaked in the late 1930's with catches exceeding 800,000 fish compared to the current catches of about 300,000. Troll catches of coho peaked in 1951 and currently amount to more than one million fish annually.

Gradually the troll fleet introduced power gear, number of lines per boat increased, size of boat increased, and the proportion of boats which fished in outside or offshore waters increased. Rapid growth in the number of hand trollers has resulted in an increasing share of both chinook and coho being taken by the gear type. In 1975, the first year when trollers were distinguished as hand or power, there were 1,100 hand trollers which landed fish. In 1978 this number increased to 2,600.

Although it is not possible to sort out the Alaska component in the troll catch, there is little doubt that Southeast Alaska chinook runs have declined significantly from previous levels. It is not clear whether these declines in Southeast Alaska should be attributed to the management of the fishery, natural mortalities (e.g. habitat degradation) or both. Coho catches also have declined from historic levels although catches have somewhat stabilized over the past several years.

Operating under the assumption that the troll fishery was inefficient and overwhelmed by the nature of the mixed stock fishery, it has only been in recent years that Alaska has applied restrictions and in-season management measures to this fishery.

Although no fishery developed west of the longitude of Cape Suckling, the troll fishery has been restricted since 1975 to the east to prevent its expansion to other stocks which have been harvested historically with inshore net fisheries.

ADF&G's primary management objective is conservation oriented and designed to provide appropriate brood stock escapement levels to spawning streams.

Since 1975 there have been a number of closures for various times and areas to accomplish this main objective.

Secondary to the conservation goal, ADF&G attempts to set regulations which will allow fishing by the various user groups. The Board has adopted a policy of allocating 20 percent of the total coho catch to the hand troll fishery.

Limited entry puts a ceiling on total troll effort, but does not prohibit an expansion of troll effort in offshore waters and does not apply to the hand troll fishery.

Because of the lack of understanding of stocks in the area of the troll fishery, several measures have been incorporated into the management scheme, primarily designed to prevent expansion of effort. These include:

1. Limited entry for power trollers (1974);
2. A prohibition of hand trolling outside the surf line (1978);
3. A line limit of 4 lines south of and 6 lines north of Cape Spencer (1980);
4. The implementation of a power gurdy limit on boats (1980);
5. A line limit of 2 gurdies or 4 sport rods for hand trollers (1980);

6. A provision for a 10-day closure of the entire troll fishery in mid-July (1980).

A research program with several aspects is underway to enhance biological understanding of the mixed stock situation. This includes:

1. Marking programs;
2. Troll log book programs;
3. CPUE analysis
4. Port sampling

U.S. - Canadian Salmon Interceptions

The main issues to be settled are:

1. The Canadian interception of several million U.S. chinook and coho salmon annually, primarily off the west coast of Vancouver Island.
2. The U.S. interception of 3-4 million Fraser River salmon annually. The U.S. has some interest because of enhancement of these stocks from U.S. funds.
3. The utilization of salmon spawning in Canada and migrating in rivers through Alaska. Presently these stocks are fully harvested by U.S. fishermen enough though the spawning grounds are in Canada.
4. The mutual catches by Alaska and Canada of hundreds of thousands of salmon originating in each other's streams.
5. The mechanism by which any interception formula would be implemented.

RRW

Retyped 3/21/80

March 19, 1980

Conservation of the depressed chinook stocks of the West Coast can only be achieved following resolution of U. S. - Canada salmon interception negotiations and completion of research to identify times and areas of concentration of these stocks. Once these two items are completed we can accomplish the goal of conservation of depressed stocks. At the present time the Alaska troll fishery and the High Seas Salmon FMP are being made the "whipping boy" for all the problems of Washington and the Columbia River stocks. The criticisms laid against the existing FMP and the amendment package are grossly overstated. For example, as Table 1 shows the salmon fisheries of Southeast Alaska account for only 9% of the chinook salmon harvested on the West Coast south of Cape Suckling, Alaska and north of California.

We recognize that all stocks are not harvested at the same rate. However, we have seen no data that demonstrates an unacceptable harvest of Columbia River stocks by the Alaska troll fishery. The only information we have seen was strongly biased against Alaska because it considered only the ocean harvest of Columbia River chinook and ignored the inshore and in-river harvests.

Also in your letter you mention an apparent overharvest of chinook during 1979. This overharvest is a complex subject and I wish to discuss this issue in detail. It is true that the 1979 commercial harvest of chinooks exceeded the upper limit of the Optimum Yield as stated in the FMP. The Optimum Yield was never intended as the criterion for evaluating the achievement of the FMP's objective to "control the expansion of the salmon troll fishery conservation zone." The Council's intent was to establish a status quo fishery. This intent has been interpreted as limiting the fishery to a level of effort and harvest comparable to the base years 1971-1977. Harvests for these years are given in the following table.

Commercial Harvest of Chinook in Southeast Alaska
State waters and FCZ

<u>1971</u>	<u>1972</u>	<u>1973</u>	<u>1974</u>	<u>1975</u>	<u>1976</u>	<u>1977</u>
334,000	287,000	344,000	347,000	302,000	242,000	285,000

mean harvest = 306,000 standard error = 14,500

The Optimum Yield for the FMP is the mean harvest plus and minus one standard error (291,500 - 320,500 chinook). For the years 1971-1977 in only one year did the harvest fall within the range. This means that in only one year out of seven was the Optimum Yield achieved. Even when the Optimum Yield range is the mean plus and minus two standard errors only four of the seven years fell within the range. It was not necessarily the Council's intent to measure the success of its plan on the basis of annual harvests relative to the Optimum Yield or to establish the upper end of the Optimum Yield range as the maximum acceptable harvest.

The largest harvest during the base period was 344,000 chinook. The 1979 harvest was 360,000 chinook which is only 16,000 fish above the highest catch of the period. An overharvest of this magnitude (i.e., fine-tuning to within a few percent of the total harvest) is very diffi-

TABLE 1

Pacific Coast Chinook Harvests
all fisheries -- troll, net, and sport
(1000's of fish)

(North of California and Southwest of Cape Suckling, Alaska)

	1974	1975	1976	1977	1978	1979	Mean	%
S.E. Alaska	374	321	249	302	407	374	338	8.9
Canada	1,785	1,820	2,127	2,067	1,889	1,557	1,874	49.4
Washington	1,103	1,298	1,286	1,085	840	709	1,054	27.8
Oregon	466	532	575	698	449	450	528	13.9
Totals	3,728	3,971	4,237	4,152	3,585	3,090	3,794	100

Source: 1974-1976 INPFC Reports
1977-1979 Respective Resource Agencies (some data preliminary)

cult to anticipate prior to the end of the season. Most of the chinook harvest is taken over a five to six month period and much of it is taken incidental to other fisheries. Further, the holding capacity of the troll fleets is greater than the experienced "overharvest."

We do not pretend that there are not problems associated with the harvest of depressed chinook stocks or that nothing more can be done to control expansion of the high seas troll fishery. Last year the fishery did expand. A larger proportion of the troll catch occurred in outside waters of Southeast Alaska than has occurred in the past. We are seeking to ensure that this does not happen again this year. The elements included in the amendment package for the FMP are helpful in accomplishing this. The limits on the number of lines which can be used will obviously impact fishing effort. The conditional midseason closure during July will help in reducing fishing effort on chinook. During recent years the catch for this time period has exceeded 30,000 chinooks.

The Alaska Department of Fish and Game is continuing to address the troll fishery by: one, conducting a biometrical analysis of logbook data, catch information, and coded wire tag data for the troll fishery through a contract funded by the North Pacific Fishery Management Council; two, continuing to expand the coverage of the coded wire tag recovery program; and three, beginning in July the Department will commence a port sampling program to document fishing performance and to enhance our in-season management capability based on catch per unit effort data; and four, unlike many other jurisdictions, Alaska is conducting an aggressive program on tagging native stocks of chinook and coho.

You must realize that the troll fishery occurs predominantly in State waters. Alaska has on its own initiative without court involvement or threat of litigation imposed regulations on the troll fishery as the need became evident. Among the actions which the State has taken to protect chinooks are:

1. Limited entry for power trollers (1975);
2. A 28 inch minimum size limit for chinooks (1977);
3. Elimination of directed net fisheries for chinook (1975-1977);
4. Closure of terminal areas to trolling (1975-1977);
5. Closure of outside waters to hand trolling (1978);
6. Establishment of 8 day opening/6 day closure fishing periods (1979);
7. Restrictions on sport fishing bag and possession limits (1975);
8. Moratorium on entry into the hand troll fishery (1980) and limited entry for hand trollers (1981); and
9. Reduced line limits for power and hand troll fisheries (1980).

Needless to say, I feel that the ban on handtrolling in the FCZ is a critical element in controlling effort in the troll fishery. We have supplied your office with ample documentation of our position and justification for the ban. For the sake of my staff I greatly fear the impacts that would fall upon us if you should specifically authorize

March 19, 1980

handtrolling in the FCZ. It would be a true tragi-comedy if you were to allow handtrolling in the FCZ and then subsequently impose severe restrictions on the entire troll fleet because of the greatly increased effort.

I strongly urged you last year to take an administrative position on handtrolling that would compliment Alaska's current regulations. Action by you at that time would have enhanced the effectiveness of the high seas salmon FMP, rather than hinder it. The fishing industry would have respected such a decision.

The Alaska Department of Fish and Game is responsible for the management of salmon fisheries which catch an average of over 50 million fish each year. The Department is virtually the only source of data and expertise for these fisheries. Any information you receive from any other agency is second hand. We have established a close working relationship with the Alaska Region of the National Marine Fisheries Service. We consider the Regional Office to be our link between your office and the State of Alaska. I hope that you respect the actions and advice of the Alaska Regional Office as representative of regional fishery management expertise that can be only acquired by proximity to the resource and industry. If the management decisions for this fishery are taken out of the hands of the Regional Office it is incumbent upon you to consult with my staff prior to taking any action.

You have asked us to recognize your sincerity in the decisions which you make. We only request that you recognize the well established sincerity of our efforts to address the problems which may be associated with the high seas troll fishery. Your forbearance is requested that we can achieve our own solution without the complicating involvement of Washington D. C. A more equitable and speedier resolution to the issues is certain to occur if the West Coast Councils can address them with a minimum of outside involvement. We ask you not succumb to the pressures from the various interest groups which seek selective advantage by your involvement in the allocation of high seas chinook.

Sincerely,



Ronald O. Skoog
Commissioner

Conservation of the depressed chinook stocks of the West Coast can only be achieved following resolution of U. S. - Canada salmon interception negotiations and completion of research to identify times and areas of concentration of these stocks. Once these two items are completed we can accomplish the goal of conservation of depressed stocks. At the present time the Alaska troll fishery and the High Seas Salmon FMP are being made the "whipping boy" for all the problems of Washington and the Columbia River stocks. The criticisms laid against the existing FMP and the amendment package are grossly overstated. For example, as Table 1 shows the salmon fisheries of Southeast Alaska account for only 9% of the chinook salmon harvested on the West Coast south of Cape Suckling, Alaska and north of California.

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Also in your letter you mention an apparent overharvest of chinook during 1979. This overharvest is a complex subject and I wish to discuss this issue in detail. It is true that the 1979 commercial harvest of chinooks exceeded the upper limit of the Optimum Yield as stated in the FMP. The Optimum Yield was never intended as the criterion for evaluating the achievement of the FMP's objective to "control the expansion of the salmon troll fishery conservation zone." The Council's intent was to establish a status quo fishery. This intent has been interpreted as limiting the fishery to a level of effort and harvest comparable to the base years 1971-1977. Harvests for these years are given in the following table.

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handtrolling in the FCZ. It would be a true tragi-comedy if you were to allow handtrolling in the FCZ and then subsequently impose severe restrictions on the entire troll fleet because of the greatly increased effort.

I strongly urged you last year to take an administrative position on handtrolling that would compliment Alaska's current regulations. Action by you at that time would have enhanced the effectiveness of the high seas salmon FMP, rather than hinder it. The fishing industry would have respected such a decision.

The Alaska Department of Fish and Game is responsible for the management of salmon fisheries which catch an average of over 50 million fish each year. The Department is virtually the only source of data and expertise for these fisheries. Any information you receive from any other agency is second hand. We have established a close working relationship with the Alaska Region of the National Marine Fisheries Service. We consider the Regional Office to be our link between your office and the State of Alaska. I hope that you respect the actions and advice of the Alaska Regional Office as representative of regional fishery management expertise that can be only acquired by proximity to the resource and industry. If the management decisions for this fishery are taken out of the hands of the Regional Office it is incumbent upon you to consult with my staff prior to taking any action.

You have asked us to recognize your sincerity in the decisions which you make. We only request that you recognize the well established sincerity of our efforts to address the problems which may be associated with the high seas troll fishery. Your forbearance is requested that we can achieve our own solution without the complicating involvement of Washington D. C. A more equitable and speedier resolution to the issues is certain to occur if the West Coast Councils can address them with a minimum of outside involvement. We ask you not succumb to the pressures from the various interest groups which seek selective advantage by your involvement in the allocation of high seas chinook.

Sincerely,


Ronald O. Skoog
Commissioner

North Pacific Fishery Management Council

Clement V. Tillion, Chairman
Jim H. Branson, Executive Director

Suite 32, 333 West 4th Avenue
Post Office Mall Building



Mailing Address: P.O. Box 3136DT
Anchorage, Alaska 99510

Telephone: (907) 274-4563
FTS 271-4064

March 28, 1980

Mr. Terry L. Leitzell, Assistant
Administrator for Fisheries
National Marine Fisheries Service
3300 Whitehaven Street, Page Bldg. 2
Washington, D.C. 20235

Dear Terry,

The Council, at its meeting of March 26-28, 1980, carefully considered your letter of March 17 concerning the 1980 amendments to the Fishery Management Plan for the High Seas Salmon Fishery off Alaska (FMP).

The Council is concerned about the increase during the last two years in the troll harvest of chinook salmon off Alaska. As you noted, the increases are contrary to the stated goal of the FMP to stabilize the level of this harvest. This goal was adopted pursuant to the Council's statutory obligation to foster the productivity and rehabilitation of all chinook stocks that are subject to the troll fishery off Alaska, wherever they might originate, in a manner that provides the greatest benefit to the Nation.

The manner in which this problem should be addressed has, since receipt of your letter, been carefully considered by the Council and its staff in close consultation with the Alaska Department of Fish and Game and the Alaska Board of Fisheries which have management authority over the greater part off the troll fishery for chinook off Alaska, and will have most of the responsibility for enforcement of the FMP and its implementing regulations during 1980.

The Council's Advisory Panel and Scientific and Statistical Committee both dealt at length with possible solutions to this question, and reported their findings to the Council. Throughout the review, careful consideration was given to the effect of the troll fishery off Alaska upon chinook stocks originating in Washington, Oregon and Idaho, as well as upon the chinook stocks originating in Alaska.

Based upon the consideration of the issues raised in your letter, the Council has concluded it to be necessary that the chinook troll harvest off Alaska be managed in a very conservative manner during 1980, so as to assure, insofar as possible, that the OY range specified in the FMP

is not exceeded. The Council has urged the NMFS Alaska Regional Director and the Alaska Department of Fish and Game to assure the attainment of this essential objective through the imposition of appropriate time and area closures or such other inseason management measures as may be necessary and appropriate. Commissioner Skoog indicated at our meeting that the Alaska Department of Fish and Game concurs in this recommendation, and will exercise its management authority over the troll fishery for chinook in a manner designed to implement it. We expect these measures to reduce the troll catch of chinook salmon off Alaska by 40,000 to 70,000 fish from 1979 levels.

The Council has directed special attention at its March 26-28 meeting to the relationship between the troll fishery off Alaska and the conservation needs of chinook stocks originating in Washington, Oregon and Idaho. It is concerned with the current lack and unavailability of data concerning the distribution of these stocks in various salmon fisheries of the Pacific Coast. The Council has already spent more than a quarter of a million dollars in the attempt to improve the quantity and quality of this information, and plans to sponsor even more intensive research and analysis efforts during the next nine months. Even in the absence of this improved information, the Council will do all it can to promote the rehabilitation of these stocks, based upon the best information available, in accordance with its statutory mandate. It should be noted that the Council has established a committee of three of its members with the duty to assure that all future salmon management measures adopted by the Council are coordinated with those adopted by the Pacific Fishery Management Council.

Based upon our discussions with the Alaska Department of Fish and Game, we are confident that reduction of the chinook harvest to the OY levels specified in the FMP can be achieved through the contemplated time and area closures. In the unlikely event that this should prove unsuccessful, however, additional measures to limit effort can be invoked. The Alaska Department of Fish and Game has adopted a wide variety of such measures over the past three years. One of these, the ban on hand trolling in waters seaward of the surfline has been rejected by you once as a provision of the FMP. The Council vigorously urges you to reconsider your current position on the hand troll ban, and to recognize its importance to the conservation of all salmon stocks that are harvested off Alaska, particularly chinook stocks originating in other states.

I cannot leave this subject without pointing out to you Terry, the actions that have been taken by the Council and the State of Alaska in the last few years to control this fishery and to learn enough about it to manage it rationally. State measures are clearly stated in Commissioner Skoog's letter to you of March 19, 1980. They include the elimination of all directed net fisheries for chinook, limited entry for power trollers, great restriction of areas open to hand trolling, inseason closures on all trolling, a 28" size limit on chinook, tagging of wild chinook stocks, closures of many areas to all trolling, heavy restrictions

on sport fishing and reduced line limits for all trollers. The Council, in conjunction usually with the Alaska Department of Fish and Game, has initiated and funded tag recovery programs, logbook and other data analysis studies, and an observer program in the troll fleet. I believe those actions demonstrate a very genuine concern for this resource and Council's sincere attempt to control expansion of the catch in this fishery, recognizing that there are depleted natural stocks from all areas of the coast involved in it. The fact that those stocks are as yet inextricably mixed, and masked, by hatchery produced stocks that are not depleted or in trouble has done nothing to improve our ability to solve the problem.

The Council has just approved a request for a proposal that will provide a non-agency scientific coordinator to work with the FMP Plan Development Team in developing a document that will assess all the information that is now available on chinook stocks in the fishery off Alaska, identify specific information needs, recommend alternative management measures for the fishery, and serve as the 1981 FMP. We expect it will also serve as the cornerstone for a comprehensive west coast salmon plan and to that end have directed the contractor to recommend a method, time schedule, and estimated costs for such a plan. We hope to finish that study by October of this year.

If you wish to discuss the Council's response to the concerns raised in your March 17th letter, we would be happy to consider sending one of our number to Washington to consult with you in person. Any such consultation should also include the Council's Executive Director, the NMFS Regional Director, the NOAA Alaska Regional Counsel, and a representative of the Alaska Department of Fish and Game.

We hope that we have addressed your concerns to your satisfaction, and that implementation of the FMP during 1980 in the conservative manner outlined above will proceed expeditiously. The contents of this letter have been reviewed and approved by the full Council.

Sincerely,

Clement V. Tillion
Chairman

Washington Department of Fisheries

Harvest Management Division

March 1980

*Presented by
Mike Fredinburg*

1980 COLUMBIA RIVER SALMON AND SOUTHEASTERN ALASKAN TROLL FISHERY

1980 Anticipated Columbia River Salmon Status

Spring Chinook

Upriver Stocks: Adult return will be 50,000 or less; will be at or near record low.

Lower River stocks: Willamette - below average (40-45,000);
Cowlitz - questionable

Summer Chinook

Outlook continues poor; at or near record low levels of recent years.

Fall Chinook (both upriver and lower river)

Return expected similar to 1979 return based upon

- (1) weak 3's in 1978 resulted in weak 4's in 1979--suggests weak 5's in 1980
- (2) weak 3's again in 1979 suggests weak 4's in 1980
- (3) return of 3's in 1980 questionable
- (4) if 3's weak, will have unusual condition of three weak brood years in 1980 Southeast Alaskan troll fishery

Coho

Jack returns in 1979 were poor and 1980 adult returns could be at or near record low

Ocean Distribution of Columbia River Fall Chinook

The ocean distribution of the two major upriver Columbia River fall chinook stocks is shown in the attached Figure 1. The two stocks are commonly referred to as upriver "Tulees" and upriver "Brights". The Tulee

stock is shown to contribute significantly to Washington coastal and B.C. ocean fisheries while "Bright" stock is shown to contribute significantly to B.C. and southeast Alaska troll fisheries.

The Spring Creek National Salmon Hatchery's stock distribution is used to model Bonneville Pool "Tulee" stock ocean distribution. This stock is essentially hatchery-produced and originates from five Bonneville pool hatcheries. The eggs from this brood stock are freely exchanged between Bonneville pool hatcheries.

The "Bright" upriver Columbia River fall chinook stock is produced (1) naturally in the mainstem Columbia River essentially in that region known as the Hanford Reach (between McNary Dam pool and Priest Rapids Dam), (2) naturally in the lower Snake River (this stock is being considered for Threatened or Endangered listing), and (3) artificially by hatcheries on the mainstem Columbia River above McNary Dam. Priest Rapids Hatchery (WDF station) is an example of the "Bright" stock being reared artificially.

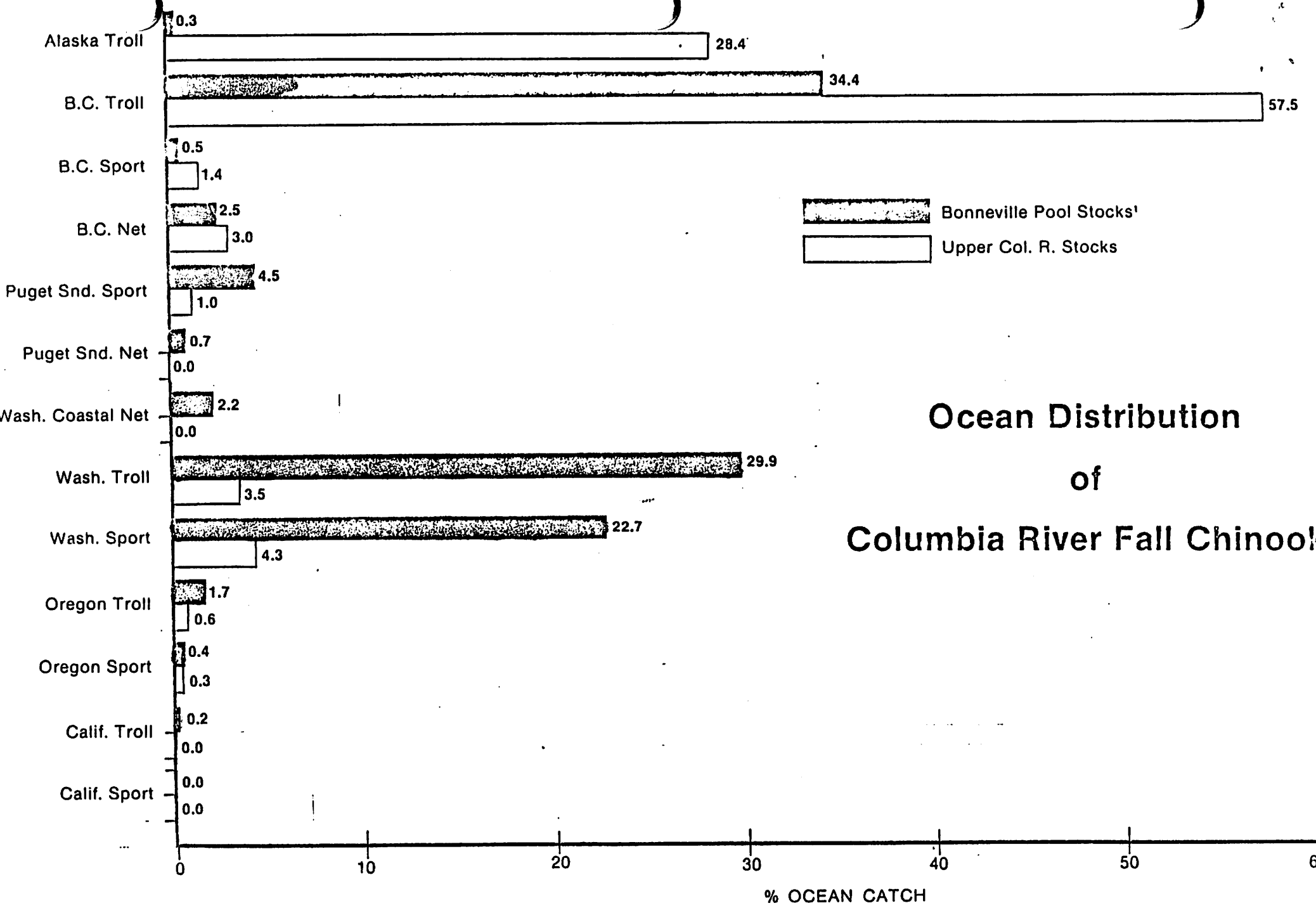
Three brood years of Priest Rapids Hatchery-reared "Brights" have been microtagged (1975, 1976, and 1977). The observed tags recovered for the 1975 brood year in the 1978 and 1979 coastal fisheries is shown in Table 1. These observed tag recoveries have not been expanded by sample size and thus the proportions of this stock contributing to the coastal fisheries is not the data presented in Figure 1.

Ocean distribution is modeled for upriver Columbia River fall chinook "Brights" as shown in Figure 1 by using a composite of three complete Trask River (Oregon coastal) brood years of marked fish recoveries. When the first Priest Rapids Hatchery brood year tag recovery data is complete, the

actual percentages harvested by each ocean fishery may change but the general ocean distribution pattern will not. This conclusion is made, and Trask River stock was chosen to model the upriver "Bright" stock based upon the following facts:

- (1) Age structure of upriver "Bright" and Trask River stock is similar, i.e., high proportion of 4's and 5's in terminal run.
- (2) Ocean distribution of 3's is similar, i.e., contribution to northern British Columbia and Southeast Alaskan troll fisheries.
- (3) High proportion of 3-year-olds in escapement are males, i.e., 80-96% at Priest Rapids and 100% at Trask River (1969-70 returns).

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Ocean Distribution of Columbia River Fall Chinook

¹Same Catch Distribution Applies to Lower Columbia Fall Chinook

Figure 1. OCEAN DISTRIBUTION OF COLUMBIA RIVER FALL CHINOOK

PRELIMINARY WASHINGTON, B.C., AND ALASKA MARINE RECOVERY
DATA FOR 1975 BROOD PRIEST RAPIDS FALL CHINOOK CWT EXPERIMENTS

Tag code:	13 7/13			13 11/1			13 12/2		
	Age ^{1/} ₂	Age ^{2/} ₃	Age ^{2/} ₄	Age ^{1/} ₂	Age ^{2/} ₃	Age ^{2/} ₄	Age ^{1/} ₂	Age ^{2/} ₃	Age ^{2/} ₄
Alaska	---	25	118	---	11	145	---	39	162
B.C.	23	48 ^{3/}	Not Avail.	25	22 ^{4/}	Not Avail.	50	75 ^{5/}	Not Avail.
Wash. ocean	---	4	10	---	3	9	---	10	14
Puget Sound	---	---	2	3	2	---	2	4	---

Release data:

Code	13 7/13	13 11/1	13 12/2
No. Released	102,710	132,004	152,412
Size (#/lb)	46.0	95.0	37.0
Release Date	6/17/76	7/1/76	7/1/76
Release Site	Ringold	Priest R.	Priest R.
Stock	Priest R.	Priest R.	Priest R.

^{1/}Estimated

^{2/}Preliminary observed

^{3/}26 N. of Vancouver Island

^{4/}10 N. of Vancouver Island

^{5/}40 N. of Vancouver Island

Note: Age 3 and 4 recoveries are preliminary observed data, not expanded for sample size.

Washington Department of Fisheries

Harvest Management Division

March 1980

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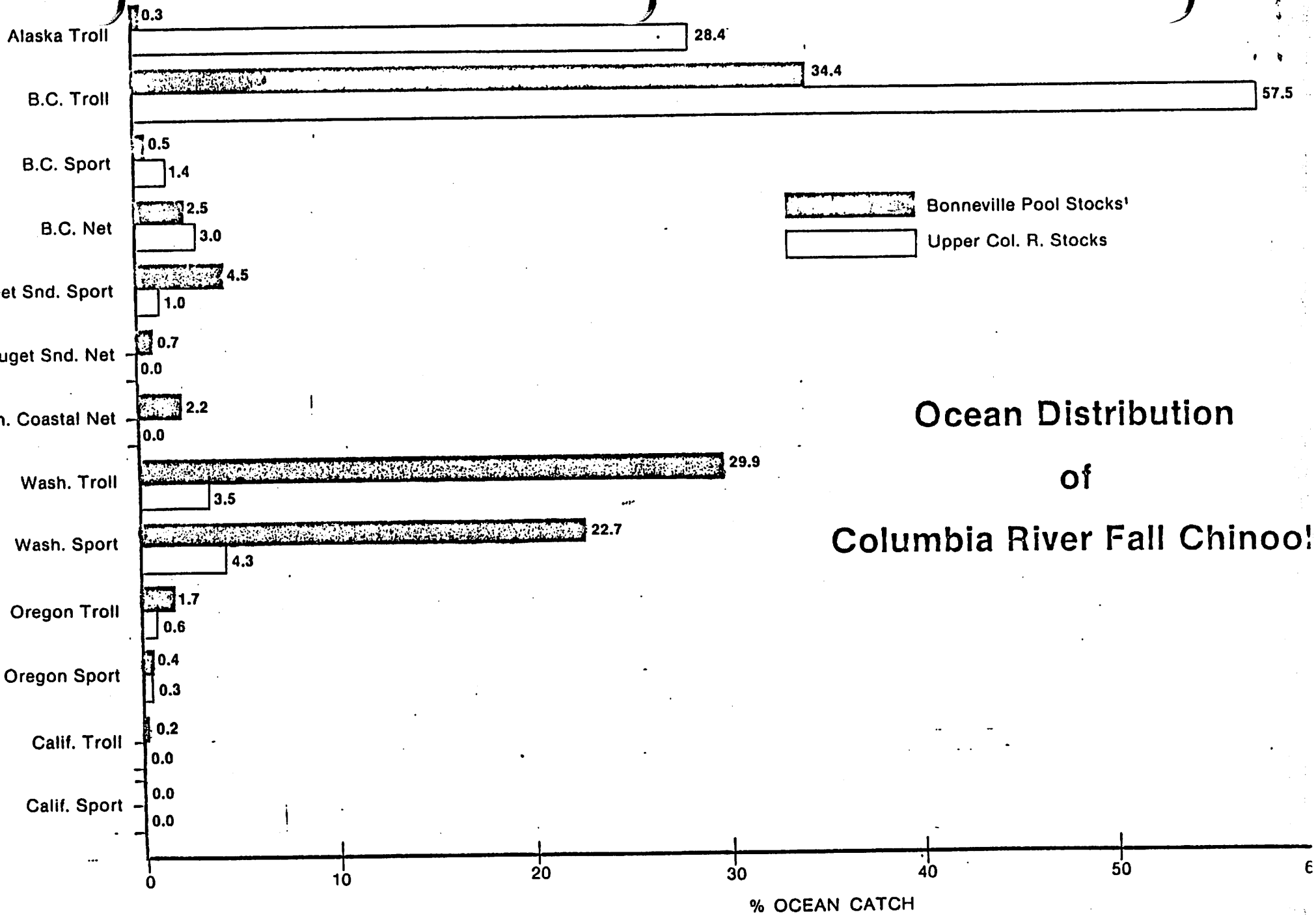
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