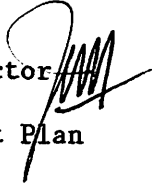


Agenda Item G-1
October, 1979

MEMORANDUM

DATE: September 28, 1979

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

FROM: Jim H. Branson, Executive Director 

SUBJECT: Troll Salmon Fishery Management Plan

COUNCIL ACTION

No Council decisions required - Information attached for public comment session topics and for consideration prior to the December meeting.

BACKGROUND INFORMATION

The PDT has identified certain regulatory changes for the 1980 fishery which have been proposed for Council consideration as topics for the public hearing and possible amendments to the existing FMP to continue it through the 1980 fishing season.

A package has been prepared for the public comment session on Wednesday, October 3; that material is included here and consists of information on:

1.	4-line limit	Encl: Page 1
2.	salmon mutilation	1
3.	possession of coho in closed area	1
4.	time/area closure #1	2-4
5.	time/area closure #2	5-6
6.	limited entry (power troll)	7-18
7.	hand troll prohibition	19-22

As with the Tanner crab material, Council action will not be necessary until the Alaska Board of Fisheries meets in December.

Attachments

Oct, 3, 1979.

RATIONALE

4-LINE LIMIT

THE MAXIMUM NUMBER OF LINES FISHED FROM A TROLL VESSEL SHALL BE FOUR LINES:

The four-line limit has been in existence in waters under State of Alaska jurisdiction for several years. The regulation is intended to stop expansion of effort on the resource.

The four-line limit is also more efficient in terms of reducing shaker mortality. When more than four lines are fished, there is a potential for additional mortalities to shakers, through drowning, as the lines take longer to work if there are more than four.

A four-line limit in Council waters would be valid for the above reasons; in addition, such a regulation is compatible with the State regulation for enforcement purposes.

RATIONALE

MUTILATION (FILLETING AT SEA)

The subject of mutilation (filleting of salmon) has arisen as a result of the possibility that a market may exist in 1980 for salmon fillets in Seattle. Should such filleting occur at sea, it makes obvious the problems of (1) identification of the fillet and (2) the possibility that the fillet is from a species for which a minimum size has been established.

If the Council wishes to address the subject, it may consider the proposal to prohibit the dressing, cleaning or preparing of any salmon at sea in such a manner as to render obscure the identification of the species.

RATIONALE

No troll vessel may fish for coho in an area closed to the taking of coho if they have coho aboard that have been caught in an open area. Failure to adopt such a regulation would render moot the effects of time/area closures on coho designed to protect the stocks.

October 3, 1979

RATIONALE

GoA TIME/AREA CLOSURE #1

In the area shown in the accompanying figure,

THE TROLL SEASON SHALL BE FROM APRIL 15 THROUGH JUNE 30 EXCEPT THAT COHO SALMON MAY BE TAKEN FROM JUNE 15 THROUGH JUNE 30.

Closure of this area to trolling is recommended for conservation of coho and immature chinook.

With current information and management techniques it is difficult to directly monitor the effect of the outside troll fishery on coho since it is the first fishery to intercept these fish. This fishery was acceptable historically, when enough fish escaped to the outside fishery to provide allotments of inside fisheries and stream escapements. However, because of the intensity of recent fishing pressure, the Board has dramatically increased conservation measures for the inside fisheries in an attempt to provide for stream escapement and maintenance of net fisheries directed on pinks and chums. (The need to provide an incidental harvest of coho in these net fisheries was identified in the "Problem Statement"). This is demonstrated by: closures, 8 on /6 off fishing periods, no sport fishing from commercial vessels, etc. Even these measures have not been sufficient. Further, the outside area was closed to hand trolling to prevent an increase in effort there by this user group. However, restrictions on the outside (e.g., 8 on / 6 off) have motivated a redistribution of some power troll effort to the coastal zone.

Recent tagging studies have shown that the coastal area north of Cape Spencer serves as a migratory route for coho destined for Southeast Alaska streams. Further, harvest rates on these stocks have been excessively high and the coastal troll fishery north of Cape Spencer is a significant contributor to these high rates.

In other words, it is necessary to allow these coho to enter inside waters where their harvest can be more effectively monitored and managed.

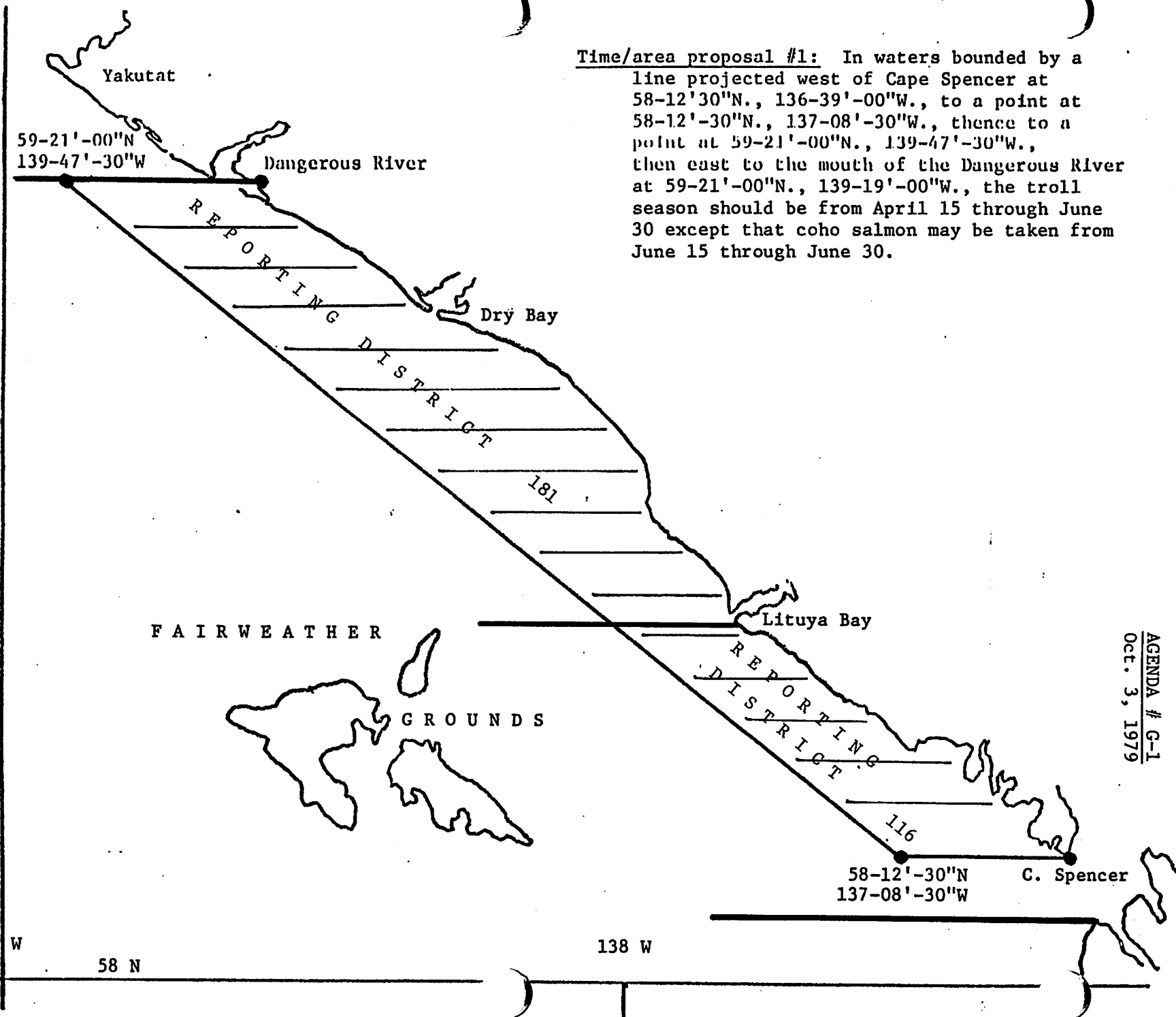
The present coho season for troll gear begins June 15. Initial catches in the outside area are small and begin to increase in July with peak harvests occurring in mid-August. The weights of individual coho early in the season are small and increase as the season progresses. A proposed closure would prevent any significant harvest of coho in the area north of Cape Spencer and in turn make these native coho available for an inside harvest at a larger size.

Coupled with the high harvest of coho in this area is the high incidence of immature, sublegal chinook particularly after July 1. The 1978 troll observer program (NPFMC leaflet #6, p. 12) reports that:

"The highest incidence of undersized fish occurred on observer trips to on-shore fishing districts adjacent to, or north of, Icy Straits (statistical areas 116-05, 181-05 and 114-21). The average incidence of undersized chinook for trips in these areas was 1.57 for each legal fish caught. For the other areas fished (statistical areas 104, 113, 116-25, 154, and 181-25) the incidence of undersized fish average 0.24 undersized chinook for each legal chinook caught."

A statistical analysis of the 1978 harvest tickets shows that the daily average weight of chinook salmon caught in areas 181 and 116 were significantly smaller than fish caught in areas 113 and 104 to the south.

Fishermen concentrate in this coastal area beginning in July to harvest the large availability of coho and thereby also harvest a large number of shaker chinook. It can be argued that if the coho were not available, the fishermen would look elsewhere for chinook of a larger size. By closing the area to fishing, not only will the coho be allowed to enter the inside waters but the pressure on shaker chinook will be reduced.



Time/area proposal #1: In waters bounded by a line projected west of Cape Spencer at 58-12'30"N., 136-39'-00"W., to a point at 58-12'-30"N., 137-08'-30"W., thence to a point at 59-21'-00"N., 139-47'-30"W., then east to the mouth of the Dangerous River at 59-21'-00"N., 139-19'-00"W., the troll season should be from April 15 through June 30 except that coho salmon may be taken from June 15 through June 30.

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Oct. 3, 1979

-4-

RATIONALE

GoA TIME/AREA CLOSURE #1

In the area shown in the accompanying figure,

THE TROLL SEASON SHALL BE FROM APRIL 15 THROUGH JUNE 30
EXCEPT THAT COHO SALMON MAY BE TAKEN FROM JUNE 15 THROUGH JUNE 30.

The closure of this area to trolling after July 1 is recommended for the conservation of coho and immature chinook. This area takes in the statistical reporting districts that serve as migration routes for coho which are destined for Southeastern Alaska streams.

The districts are presently open to power troll gear only, which, in 1978, took significant numbers of coho from these areas that were bound for major river systems in Districts 11, 12 and 15. Harvest rates in District 116 ranged from 18.2% for Berner's River to 40.3% for Chilkat Lake. These high harvest rates prompted the board to restrict fishing times and areas for all gear in 1979 and in inside waters to protect returns of coho. Harvest of cohos by power troll gear in Districts 116 and 181 will increase as a result of this action because of the redistribution of effort.

Coupled with the demonstrated high rate of coho harvest in these districts is the phenomenon of a high incidence of undersized chinook. The 1978 Alaska Trollers Association Logbook report indicates that these districts were higher in reported "shaker" incidence and lower in incidence than other coastal districts.

The 1978 Troll Observer Report indicated that shaker catches of twice the legal catch occurred in these districts after July 1. The average weight of chinook reported from these districts indicates a preponderance of small chinook. Most fishermen would look elsewhere for larger chinook if coho could not be taken in large numbers in these districts (public testimony - NPFMC hearing, Sitka & Pelican, 1978). Therefore, fishermen continue to fish on intermixed stocks of coho that will receive additional exploitation elsewhere, and catch, incidentally, small chinook, many of which are sub-legal. If the proposed districts were closed the chinook would be larger and worth more to the fisherman when harvested in subsequent years in other districts. The coho would be available for harvest in other Southeastern districts later in the season and at a larger size as they approached their terminal areas.

RATIONALE

GoA TIME/AREA CLOSURE #2

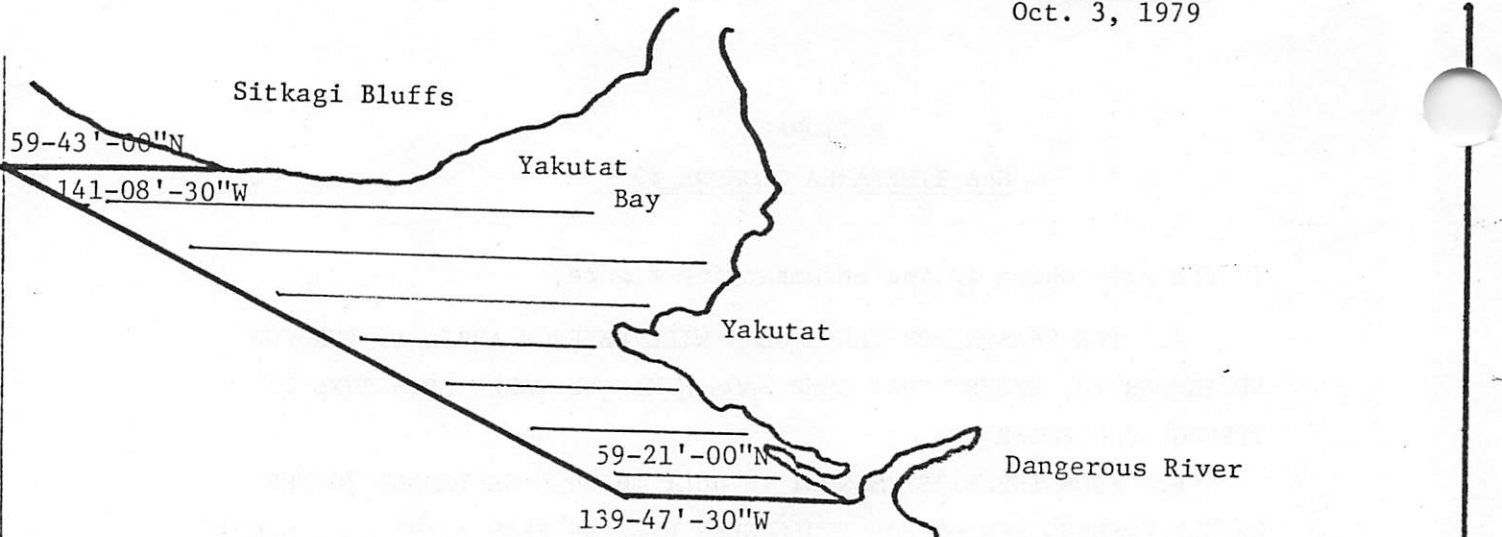
In the area shown in the accompanying figure,

A. THE SEASON FOR TROLL GEAR WILL BE FROM APRIL 15 THROUGH SEPTEMBER 20, EXCEPT THAT COHO SAOMON MAY BE TAKEN FROM JUNE 15 THROUGH SEPTEMBER 20.

B. FROM THE FIRST MONDAY IN JULY THROUGH SEPTEMBER 20 THE WEEKLY FISHING PERIOD FOR TROLL GEAR WILL BE FROM 12:01 p.m. MONDAY THROUGH 12:00 NOON FRIDAY.

Coho salmon taken in Yakutat Bay, and along the coast immediately outside the bay, appear to be stocks bound for Yakutat District streams. A local troll fleet has developed a dependency on a portion of the harvest from these streams, but set gillnet fisheries located in river mouths in the Yakutat District have historically, and continue, to harvest the majority of these fish. A weekly fishing period for troll gear inside Yakutat Bay has stabilized troll effort in recent years, but troll effort, largely by hand trollers, is increasing outside the bay and allocation problems will soon develop unless some restrictions are imposed. Extending the fishing period to waters immediately outside of Yakutat Bay is intended to check effort increases on Yakutat District coho stocks and still allow the established troll fishery to continue.

Chinook salmon harvested in, and around, the mouth of Yakutat Bay are probably comprised of the same stocks that migrate through, and feed along, the coast from Dry Bay to Cape Spencer. The average weight of chinook salmon caught in Yakutat Bay is usually small, and effort on these fish should not be increased. Some streams in the Yakutat area have chinook salmon runs, but are depleted and cannot support increased effort.



Time/area proposal #2: In waters bounded

by a line projected west from the mouth of the Dangerous River at 59-21'-00"N., to a point at 59-21'-00"N., 139-47'-30"W., then to a point at 59-43'-00"N., 141-08'-30"W., then east to Stikagi Bluffs at 59-43'-00"N., 140-39'-00"W., the following regulations should be in effect:

- A. The season for troll gear will be from April 15 through September 20, except that coho salmon may be taken from June 15 through September 20.
- B. From the first Monday in July through September 20 the weekly fishing period for troll gear will be from 12:01 Monday through 12:00 noon Friday.

F A I R W E A T H E R
G R O U N D S



LIMITED ENTRY DISCUSSION

Alaska's Limited Entry System

The State of Alaska passed limited entry enabling legislation in April of 1973, which established the Commercial Fisheries Entry Commission (CFEC) and charged it with promulgating regulations to limit entry into those fisheries which, in CFEC's judgment, require limitation. The Southeast power troll salmon fishery was limited by CFEC in December of 1974. Entry into the Southeast hand troll fishery has not been limited.

Regulations implementing power troll limited entry established the maximum number of permits at 950, although this could be exceeded so as to prevent exclusion of persons who would suffer "significant economic hardship." (See. Appendix 8.3.1.3, December 1, 1979 final draft of the Salmon Plan approved on May 15, 1979 (44 FR 33250, June 8, 1979), for a discussion of how the State system was developed.) As of May 15, 1979, 934 power troll permanent entry permits had been issued. Approximately 40 more applications for such permanent permits were still in adjudication, the applicants for which were allowed to continue fishing under power troll interim-use permits. Thus at the time regulations for the 1979 salmon plan were first implemented, there were about 974 units of power troll gear allowed to fish under Alaska's limited entry system.

In July of 1979, however, the Alaska Supreme Court handed down a decision which will require CFEC to issue an as yet undetermined number of additional permits. Essentially, CFEC will have to award a certain number of points to persons who did not hold a gear license, and were thus prevented from applying for an entry permit, but who nevertheless were partners of, and equal in status to, the power troller who held the gear license and got the entry permit. CFEC is now drafting the regulations to implement this decision, but it is just too soon to know how many persons will apply for permits, and how many of those applicants will be granted interim-use permits until decisions on their applications are made. CFEC estimates that the number of additional interim-use and perhaps permanent entry permits may range from as low as 25 to as high as 200, although 50 is suggested as the most realistic estimate.

As stated, CFEC has not implemented limited entry for hand trollers. Whether or not this fishery should continue to remain open to entry has been a hotly debated issue for the last few years. Those who wish the fishery to continue to remain open feel that there should be at least one unlimited salmon fishery to provide a relatively low-cost entry opportunity to anyone who wishes to become a fisherman. Those who want the fishery included under the limited entry system cite the tremendous growth in the fishery over recent years and the resulting management problems (See Problem Statement-The Troll Fishery).

CFEC is now taking initial steps to limit the hand troll fishery. Studies are being conducted to determine characteristics of fishermen participation. The results of these studies and their applicability to a limited entry system will be the subject of public hearings held this year. Subsequently, regulations establishing a point system will be drafted and presented at a second round of hearings. These regulations, or a modified version, will then be adopted. However, it is unlikely that access to the hand troll fishery will be controlled prior to 1981.

Council Moratorium

The Salmon Plan prepared by the Council now in effect states that limited entry is necessary to maintain present levels of effort and catch in the power troll fishery in the FCZ, that limited entry will promote efficient operation of other management measures, that without limited entry there is a significant probability that persons affected by restrictions in other fisheries will turn to Alaska, and that limited entry is less socially and economically disruptive than alternative management measures designed to restrict trolling in the FCZ. Earlier drafts of the plan proposed a separate limited entry system for the FCZ which would have only granted access to power trollers who could document having fished there in the years 1975-1977. This was rejected, however, partly due to allegations by power trollers that the fish ticket data upon which such a scheme

would be based was faulty, but primarily due to the recognition by the Council that the power troll fishery was a single fishery and should not be split by the three-mile boundary line. Accordingly, the plan "adopted" Alaska's limited entry system, thus permitting all holders of power troll entry permits to fish in the FCZ. The plan also granted access to persons not holding an Alaska permit but who could document having fished in the FCZ. Nobody has yet qualified under this last provision.

During preparation of regulations to implement the plan, it became apparent that there was little, if any, guidance in the plan on just how the State system should be "adopted." The most significant problem was expressed by the Assistant Administrator for Fisheries, NMFS, in a letter to the Chairman of the Council explaining approval of the salmon plan:

In examining the details of the Alaska system, it became apparent that under this system, State officials make certain discretionary judgments that could affect the rights of individuals to fish in the FCZ under the FMP. Some of these discretionary judgments involve revoking existing permits, granting additional permits, determining the optimum number of permits, and transferring permits. The FCMA contemplates that the Secretary is responsible for promulgating and carrying out the regulations for plans. It would be inappropriate under the FCMA if State, regional or local officials, or private parties, were to be given the authority to determine the rights of individuals in the FCZ. Accordingly, we have implemented the limited entry system in a manner which is consistent with the

intent of the Council, by allowing those persons holding State permits to fish in the FCZ in 1979. The many difficulties associated with developing a unified Federal-State limited entry system, however, should be addressed before that system is extended beyond 1979.

As further explained in the preamble to the proposed regulations (44 FR 29080, May 18, 1979), the plan's "adoption" of the State system was implemented as a one-year moratorium on issuance of commercial power troll permits for the FCZ. Only those persons who held a State power troll permanent entry or interim-use permit on May 15, 1979 were allowed to fish in the FCZ in 1979, which, as discussed above, was approximately 974 persons.

The regulations implementing this moratorium provided that the Regional Director could override a decision by CFEC which affected an individual's right to fish in the FCZ. For example, if CFEC denied transfer of a State entry permit, which effectively would also deny transfer of the FCZ authorization, the parties involved could apply to the Regional Director to have that FCZ authorization transferred. Although the Regional Director would make his decision based on the same criteria as the State decision, it is possible that he could approve such a transfer, which would effect a severance of the FCZ authorization from the State permit. If this happened, the State permit holder could no

longer fish in the FCZ and the Federal permit holder could not fish in State waters. Unfortunately, a severance as described would have a result contrary to the management objectives of the salmon plan in that where there formerly was only one unit of gear, there would, after a severance, be two units of gear, although each would be restricted to a separate area. In addition, that a separate FCZ-only authorization or permit would result from a severance, and possibly in other situations as well -- override of a State denial of an emergency transfer, revocation of a State permit, and more -- raises serious enforcement problems in determining which permit holder is allowed to fish where.

Alternatives for the FCZ for 1980

A. Power Troll Fishery

Four alternatives are identified for limited entry for the FCZ for 1980. These are: having no limited entry or moratorium; extending the moratorium now in effect, which means no entry into the FCZ for anyone who obtained a State interim-use or permanent entry permit after May 15, 1979; broadening the current moratorium to include any persons who obtain a State permit after May 15, 1979, mostly as a result of the recent Alaska Supreme Court decision; and establishing the limited entry system proposed last year, which would allow into the FCZ only those power trollers who can document having fished in the FCZ during the base years 1977-1979.

1. No Limited Entry or Moratorium

This alternative would essentially reopen the FCZ to any power trollers who desired to fish there, including all Alaska entry permit holders as well as other power trollers who don't have Alaska permits but land their catches out of Alaska (eg. Washington).

Advantages:

- Eliminates all administrative and enforcement problems associated with having a limited entry system in the FCZ.

Disadvantages:

- Does nothing to restrain or control expansion of the power troll fishery in the FCZ; and

- Would probably necessitate rather severe time and area limitations in the FCZ in order to accomplish such restraint or control.

2. Current Moratorium

This alternative would leave matters as they now exist - the number of units of gear would be limited to the approximately 974 allowed in the FCZ as of May 15, 1979. New interim-use or permanent entry permit holders, that is, who became such after May 15, 1979, would not be allowed to fish in the FCZ. The intent would be to exclude those persons who obtain their permits as a result of the recent Alaska Supreme Court decisions. Of course, transferees of permanent permits which had been issued by May 15, 1979 would not be excluded from the FCZ.

Advantages:

- Prevents the number of units of power troll gear allowed in the FCZ from increasing beyond the approximately 974 units now allowed, which promotes the management goal of restricting increased effort; and

- By controlling effort in that manner would do nothing to worsen current West Coast salmon problems, including treaty entitlements of Washington State tribes.

Disadvantages:

- Raises problems in administering two types of State permits - those allowed into the FCZ, and those recently issued permits not allowed into the FCZ;
- Creates potential enforcement problems associated with having the two sets of permits; and
- Contemplates almost a "separate" limited entry system in the FCZ.

3. New Moratorium

This alternative would extend the current moratorium but in revised fashion -- persons who receive a State permanent entry or interim-use permit after May 15, 1979, mostly as a result of the recent court decisions, would be permitted to fish in the FCZ. There would still be a restriction on entry by persons who did not have a State permit.

Advantages:

- Alleviates the enforcement problems associated with allowing some, but not other, State permit holders to fish in the FCZ; and

- Eases many problems with administering the two sets of permits.

Disadvantages:

- Gives, by CFEC estimates, anywhere from 25 - 200, but probably around 50 additional persons the right to fish in the FCZ, which is contrary to the stated goals of the plan; and

- Allows such additional effort at a time when the issue of interception of Canadian and Washington State bound stocks is quite sensitive.

4. Entry Limited to Actual Participants

This alternative is essentially the same as one proposed, but rejected, by the Council last year -- entry into the FCZ would be limited to only those power trollers who could document having fished in the FCZ during the base years 1977-1979. This proposal is raised again primarily as an option to alternative 2 above. If the Council were to retain the current moratorium as that alternative suggests, which necessarily means that the Council would be moving toward a limited entry system that is

not coextensive with, but in fact separate from, the State's system, then it seems logical to consider a separate system for the FCZ that would be the most effective in holding effort to current levels.

Advantages:

- Provides the most effective and meaningful restriction on increases of effort beyond present levels; and
- As such, accomodates the recognized goals of maintaining present harvest and interception rates but also maintaining, and even increasing, escapement.

Disadvantages:

- Creates the same administrative and enforcement problems with administering two limited entry systems as suggested by alternative 2, only to a much greater degree; and
- Involves many, though not all, of the same data problems thought to be objectionable last year.

B. Hand Troll Fishery

If the prohibition against hand trolling in the FCZ is not accepted by the Council, or is rejected by the Secretary of Commerce, a limited entry system for hand trollers could be instituted for the FCZ. Only those hand trollers who could document having fished in the FCZ during the base years 1976-1978 would be allowed to fish there in 1980. Current data indicates that relatively few hand trollers would gain entry under this system.

If the prohibition against hand trolling in the FCZ is upheld, then the Council should wait for CFEC to develop its hand troll limited entry system before taking independent action to limit entry of hand trollers into the FCZ.

Oct. 3, 1979

HAND VS POWER TROLL

Distinct and differential treatment between these two user groups is and will continue to be a significant aspect of managing the resource.

Policies adopted by the Board of Fisheries concerning hand troll gear were designed to control expansion of the exploitation of chinook and coho salmon stocks by that gear. Restrictions placed on the gear as a result of those policy decisions were applied only where significant growth in terms of numbers of vessels had occurred or where there was already other gear types present in numbers so abundant as to be able to fully harvest the available resource. In several instances, as a result of Board policy, hand troll gear was awarded special consideration and areas that had previously been closed were opened. The Board reviewed all information available in making these decisions. The recognized differences in socio-economic characteristics, potential for rapid increase in numbers, improving efficiency, and biologically detrimental results of no action on its part prompted the Board's action. Hand troll gear continues to support those dependent upon that fishing gear type at historic levels. Lack of time or area restrictions on hand troll gear for these areas not effected by Board action continues to allow for substantial harvest of chinook and coho.

Difference Between the Two Gear Types

Hand trollers and power trollers are two groups of fishermen who do not use essentially the same type of gear. The criterion in the State's regulation to differentiate these gear types is the method to retrieve the lines: hand power (or hand powered crank including rod and reel) vs. electrical, hydraulic, mechanical or other. This is not a fine line to draw and the difference in the two gear types (i.e., user groups) would be even more apparent in a comparison of the two fleets. A detailed analysis of each fleet's effort--expressed by criteria such as vessel characteristics (seaworthiness, hold capacity, range, electronics, etc.), number of lines and leaders, retrieval mechanism (indicating fishable depths, retrieval speed, etc.), and crew experience--would show

that a "typical" hand troller is significantly different from a typical power troller.

Looking at individual units of gear (vessels) would indeed show that some hand tollers (the "highliners") are more efficient than some of the power trollers. But these top-of-the-line hand trollers do not represent the historic hand troll fleet. They have arisen as a result of power troll limited entry and the fact that hand trolling is still open to entry to those who did not qualify for a power troll entry permit; to new entrants to the troll fishery; and to those who have upgraded within the hand troll fleet.

Impact of Permitting Hand Trolling in the FCZ

Permission by the Federal government to hand troll in the FCZ would have the following consequences:

1. This would constitute a major setback to the State's efforts to control expansion of the troll fishery.
2. Present West Coast U.S. - Canada salmon negotiations are proceeding on the understanding that neither country will allow significant expansion of the intercepting fisheries. The efforts of Alaska to limit the potential expansion of hand troll effort in its coastal and offshore intercepting have been favorably received by representatives of all parties involved.
3. The prohibition in hand trolling in State coastal waters and the acceptance of hand trolling in the FCZ would create an impossible enforcement situation for the U.S. Coast Guard and the Alaska Department of Public Safety.
4. Prior to the closure of the State's coastal waters to hand trolling in 1978, little hand troll effort took place offshore due to the nature of the boats and retrieval mechanism used by the hand troll

fishery. Small craft, many equipped with sport rods, could not effectively fish the exposed coasts of Southeast Alaska. The small number of operators who did occasionally fish offshore caught an insignificant portion of the total troll fishery harvest. However, limited entry on power trolling and the current high price paid for chinook and coho salmon has stimulated the development of a "professional" hand troll fleet which fishes full-time in State waters. Large boats equipped with hand gurdies are capable of participating in the FCZ fishery. A major increase in offshore troll effort on mixed stocks of chinook and coho salmon would occur within a few years if hand trolling is not banned. This effort increase would have the following social and biological impacts:

The chinook salmon in the FCZ include stocks of fish from Oregon, Washington, Canadian and Alaskan river systems. Many wild stocks of chinook salmon from the West Coast, including Alaska, are depleted. The states of Alaska, Washington and Oregon and the Pacific Fishery Management Council have adopted regulations designed to protect and rebuild chinook salmon runs. To allow increased troll fishing effort on the mixed stocks of chinook off Alaska would directly negate these actions as depressed stocks would be subject to even greater fishing pressure.

Mark and recapture studies of wild stocks in northern Southeast Alaska has established that some coho salmon stocks are being harvested at the 80 to 95 percent level. The major portion of this harvest is taken by troll fishing. Conservation measures will be frustrated in hand trolling effort is allowed on the mixed stocks offshore. A decline in coho escapements is apparent in Southeast Alaska in those areas where surveys are made. Methods must be found to reduce, stabilize (not increase) troll fishing effort. A harvest level exceeding 80 percent is considered much too high to insure maintenance of a wild stock. A harvest level of 60 to 70 percent is more realistic and the State of Alaska is attempting to reduce the harvest rates to this level.

In order to protect and rebuild depleted chinook salmon stocks and to reduce the high harvest rate on coho salmon, the State of Alaska has developed a complex regulatory regime for all inshore salmon fisheries. Drift gillnetting, seining, sport fishing and commercial trolling on the inside waters have all been markedly affected. Each change in the fishing pattern of an Alaska salmon fishing fleet necessiated by new restrictions has secondary impacts on numerous rural communities. The Alaska Board of Fisheries tries to minimize these secondary impacts, but to allow further increases of trolling effort offshore could only speed the closure of more inside areas and ^{would} force a major disruption of existing fisheries and the communities which they support.

Management of high seas mixed stock salmon resources off Southeast Alaska requires immediate control of the expansion of the troll fishery and eventual reduction of harvest rates.

Hand trolling has been treated as a separate entity in Alaska since 1973 and meets the test of a different gear type. Hand troll gear has not been significantly utilized in offshore areas and to assure conservation of the salmon resources the State has prohibited this gear in its coastal zone. (0-3 N. miles offshore). A necessary element contributing to the success of this management program is the prohibition of hand trolling in the FCZ.

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		Sec. Recep.	
		Sec. Typist	
		Elfin Cove, Alaska 99825	
		September 10, 1979	

Board of Fisheries, Juneau
 Alaska Department of Fish and Game, Juneau
 North Pacific Fisheries Management Council, Anchorage
 Alaska Trollers Association, Ketchikan

SEP 28 1979

Elfin Cove is a small fishing village with a resident population of about 30 persons. The sole economic support of Elfin Cove is commercial fishing, especially trolling.

The Elfin Cove commercial troll fleet is made up of power trollers who fish only offshore, power trollers who can only fish inshore, power trollers who fish inshore and offshore, and a few hand trollers, who fish where regulations allow. There is harmony amongst these fishermen: A workable fishing relationship has been established between the users of different geographic areas.

This fishing season, area 14A, which surrounds Elfin Cove, was included in the 8-day/6-day fishing opening/closure periods. With fishing time limited by the 3-day openings and the later total closure, Elfin Cove fishermen who could not fish offshore have suffered severe economic distress, as have the local supportive businesses (restaurant, grocery stores, laundromat, etc.).

Elfin Cove fishermen recognize the necessity of fishery conservation measures, including the possible need of closures during peak fishing times for all user groups to protect a threatened stock. However, we cannot accept regulations causing economic instability and fostering social upheaval.

Elfin Cove supports a Limited Entry Program for hand troll vessels based only on criteria giving preference to those engaged in the fishery full-time.

With a regulated hand troll fleet size, the hand troll closure for the Fishery Conservation Zone should be repealed and the 8-day/6-day fishing period eliminated from area 14A.

The offshore fishermen of Elfin Cove believe a 4-line limit would be difficult to enforce. A dangerous precedent with unenforced regulations has been set this past fishing season with hand troll vessels fishing in federal waters. A law should not invite disregard for regulations, and measures which cannot be enforced do just that.

In order that regulations be based on substantial evidence Alaska Department of Fish and Game data collection needs to address many problem areas, including chinook shakers and net fishery drop-outs, the poor reporting of statistical areas on fish harvest tickets, and the serious problem of dressed net fish sold on power and hand troll gear cards.

Quite often small bush communities are the last to learn of events that may impact their day-to-day living. Information regarding the scheduling of meetings and deadlines for public comments should be disseminated to all fishermen on a timely basis. Public media, such as (Alascom) Cape Spencer Radio and commercial Am/FM radio, should be utilized. Meetings should be located and scheduled to benefit the fishermen. Pelican, during a slack fishing period, would be an ideal meeting site for area fishermen.

As decisions are made directing the future of commercial trolling, please consider the implications of regulatory measures touching the daily life of fishermen. Many Elfin Cove fishermen are beyond the age of learning a new skill, and the younger fishermen have no desire to abandon what has been a satisfying way to make one's own living.

The Community of Elfin Cove

Timothy S. Abely
Joe A. Craig
James M. Musett
George Musett
Stephen R. Alexander
Louis Matheson

Devita L. Kennedy
Jim J. Emery
Rickard Barnes
Dennis W. Enderle

Keith M. Kennedy
Frank J. Kennedy

Paul Johnson
Walter Williams