



STATE OF
WASHINGTON

Dixy Lee Ray
Governor

DEPARTMENT OF FISHERIES

115 General Administration Building, Olympia, Washington 98504

Agenda Item 6

May 1978
2067753-6500

May 18, 1978

2
Mr. Harold E. Lokken, Chairman
North Pacific Fishery Management Council
P.O. Box 3136 DT
Anchorage, AK 99510

Dear Harold:

I will be unable to personally attend the May meeting of the North Pacific Fishery Management Council due to prior commitments. However, we have carefully reviewed the first draft of the NPFMC's Fishery Management Plan for the High Seas Salmon Fishery off the Coast of Alaska East of 175 Degrees East Longitude and have very serious concerns which must be brought to the attention of the Council members.

Our primary problem lies with the paradox created by an FMP which states that no allowable harvest can occur for conservation reasons and then attempts to justify a major fishery solely on "socio-economical" grounds. We do not advocate elimination or even serious reduction of the commercial troll fishery off Alaska, but firmly believe that its continuance as a major, viable fishery must be based upon grounds other than those currently expressed in the plan. Specific management principles must be developed for guidance when a historical but mixed stock fishery exceeds the harvest rate which is appropriate for one or more of the stocks present in the fishery. In turn, management principles must be developed which acknowledge the historical presence of other fisheries which rely on the specific stocks which are harvested by the mixed stock fishery.

With respect to chinook salmon, we believe the weight of available evidence indicates that Alaskan-origin fish are only a relatively minor component in the offshore troll catch. Since the aggregate of Washington, Oregon, and Canadian stocks available to the fishery predominates to a high degree and generally has some harvestable surpluses, there is a question whether it would be practical to regulate a major mixed stock fishery on the basis of a small, weak component being present. In terms of practical fishery management, protection of Alaskan chinook stocks should occur selectively in those inshore waters where they would constitute a significant proportion of any chinook catch which might be made. The FMP should reflect this fact.

To illustrate our degree of involvement with respect to chinook salmon, my staff has summarized certain results from recoveries of marked and tagged fish in 1975 and 1976. The Oregon Department of Fish and Wildlife publishes a comprehensive report each year giving results from all U.S. Pacific Coast salmon fisheries. The attached table lists those experimental groups providing at least 50 estimated recoveries in U.S. fisheries for a single age class and a



Mr. Harold E. Lokken
Page Two
May 18, 1978

contribution of at least 10% from the Alaskan troll catch. It is obvious from the table that the Alaskan troll fishery is a major U.S. harvester of certain Washington coastal, Columbia River, Oregon coastal, and Puget Sound chinook salmon stocks. The FMP should include such relevant data and the status of the Canadian, Washington, and Oregon stocks upon which the fishery is dependent.

Given these facts and the paradox created by the FMP, we firmly believe a conservative approach is warranted. Such a conservative approach does not justify expansion of the optimum yield by 25% or any other percentage. The plan must rely on the "best data available" while we are awaiting the more finite data acknowledged as needed to fully manage this fishery. We would submit that the only data which qualifies at this moment is the unbiased catch records of the fishery in recent years as obtained by the staff of the Alaska Department of Fish and Game. We also believe that the supposed lack of information is overstated to some degree since certain available technical data have yet to be provided in the plan. These include, for example, hundreds of daily records on troll fishing off Alaska collected during Washington's 1970-71 log-book program. We will attempt to provide these data and anything else of relevance through our member on the plan development team and would hope that subsequent versions of the Alaskan troll plan can reflect these additions.

In the case of coho salmon, where Alaskan stocks predominate to a high degree in the offshore fishery, we believe the fishery should be managed to meet the basic conservation needs of this resource. If coho stocks normally contributing important quantities of fish to the offshore fishery are in need of partial or even complete protection, then the troll fishery should be managed accordingly in a straightforward manner to achieve this protection. Obviously, the potential for a major chinook-only fishery on mature stocks still exists from mid-April to about mid-July even if coho are found in need of complete protection during years of poor abundance.

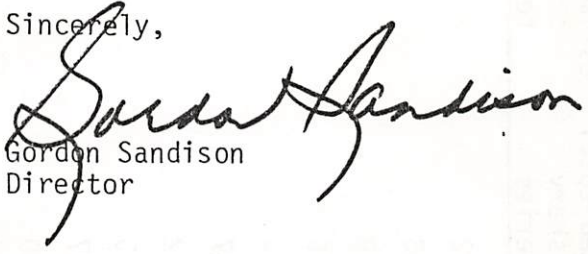
Accepting the expressed status of Southeastern Alaskan fall chinook stocks, the paradox of a fishery managed solely for socio-economic purposes and the need to minimize or stabilize the impact of a mixed stock fishery on all components which support this fishery, it is desirable to control its effective fishing rate. At a minimum, recent past rates of harvest should not be exceeded during the next few seasons while awaiting the finite data necessary to manage this fishery. In terms of immediate technical practicality, we feel that a specific limitation on days fished is the most reasonable approach. While this method has some inherent drawbacks, it provides a more effective short-term control mechanism than either catch quotas or any limitation on number of boats.

In summary, we have three major concerns with the first draft of the NPFMC's Salmon FMP. These are: (1) the development of a management plan based solely on socio-economic considerations; (2) the lack of attention given

Mr. Harold E. Lokken
Page Three
May 18, 1978

to non-Alaskan chinook stocks which comprise the major stocks present in the troll fishery and; (3) the plan's failure to provide effective controls on the fishing rates applied to these stocks. Hopefully, these deficiencies can be corrected.

Sincerely,



Gordon Sandison
Director

Enclosure

1974-75 results from sampling U.S. Pacific Coast salmon fisheries for marked and tagged fish (Groups with less than 50 estimated recoveries or less than a 10% Alaska troll fishery contribution are excluded)

Recovery year	Mark/Tag	Age at recovery	Origin	Estimated total U.S. fishery recoveries	Estimated Alaska troll fishery recoveries	% Alaska troll fishery
1974	Do-LV	4	Willamette River (Columbia River)	272	138	51
	Do-LV	3	Willamette River (Columbia River)	103	13	13
	Ad-LM	5	Elk River (Oregon Coast)	319	91	29
	Ad-RM	4	Elk River (Oregon Coast)	966	229	24
	015 000 009	3	Nemah River (Washington Coast)	54	30	56
	015 002 002	4	Nemah River (Washington Coast)	87	30	34
	015 002 004	4	Nemah River (Washington Coast)	162	53	33
	015 003 003	3	Soleduck River (Washington Coast)	115	32	28
	PK-Rd	4	Big Creek (Columbia River)	507	297	59
	PK-GN	4	Eagle Creek (Columbia River)	50	20	40
	PK-Bu	3	Big Creek (Columbia River)	313	60	19
	PK-Yw	4	Trask River (Oregon Coast)	194	179	92
	3/3	4	Kalama River (Columbia River)	86	15	17
1975	Do-LV	4	Willamette River (Columbia River)	114	48	42
	LV-RV	4	Deschutes River (Columbia River)	127	14	11
	015 000 008	4	Nemah River (Washington Coast)	156	78	50
	015 002 002	4	Nemah River (Washington Coast)	137	71	52
	015 002 003	4	Green River (Puget Sound)	102	24	24
	015 002 004	4	Nemah River (Washington Coast)	202	85	42
	015 002 014	4	Soleduck River (Washington Coast)	116	93	80
	015 003 002	4	Soleduck River (Washington Coast)	312	135	43

(Continued)

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Recovery year	Mark/Tag	Age at recovery	Origin	Estimated total U.S. fishery recoveries	Estimated Alaska troll fishery recoveries	% Alaska troll fishery
1975	015 003 003	4	Soleduck River (Washington Coast)	148	94	64
	015 006 008	4	Kalama River (Columbia River)	151	76	50
	015 006 015	4	Cowlitz River (Columbia River)	103	14	14
	015 007 015	4	Elwha River (Puget Sound)	113	16	14
	015 011 001	3	Nemah River (Washington Coast)	88	9	10
	PK-Rd	5	Big Creek (Columbia River)	347	87	25
	PK-Bu	4	Big Creek (Columbia River)	505	152	30
	PK-Yw	5	Trask River (Oregon Coast)	71	63	89

