May 26, 1978

The Honorable Mike Gravel United States Senate Washington, D.C. 20510

Dear Senator Gravel:

The North Pacific Fishery Management Council, in a follow up to our letter to you dated April 11, 1978, has examined Senate Bill 2762 (a Bill to provide for the development of aquaculture in the United States and for other purposes) and would like to make the following comments and observations. We agree with the points made in our previous letter to you which (1) favored regionalization aspects of advisory subcommittees and (2) favored the enhancement and rehabilitation of traditional publicly owned fish stocks.

We do not feel that it is appropriate at this time, to support an aquaculture bill per se because of our very minor interchange with aquaculture in any aspect of our fishery management plans. We do however, feel strongly about needed regional input into any national aquaculture plan, your rehabilitation and enhancement goals, and aquaculture as a coastal activity desirous of consideration along with other competing activities. In addition, the points we feel which should be added to those in our previous letter to you deal with (1) the parentage aspects of the lead agency roles, (2) the specific areas and stocks of primary concern to

the Council and (3) the philosophical goals of aquaculture as they affect the Fishery Conservation and Management Act.

The placement of the Department of Commerce as the lead agency in this Bill we find acceptable and desirable. It appears to us that DOC/NOAA/NMFS and its associated Sea Grant programs are logical coordinators for this effort. We would hope that very careful coordination and planning would however, occur between the Departments of Commerce and Agriculture as the DOA has an important place in the long standing history of food production.

The areas and stocks of primary concern to the Council as we said, appear to be insignificant in the overall implications of the Bill. Even though the Council has the responsibility of managing anadromous fish stocks throughout their range, the direct implications of your Bill would only deal (in the immediate future) with troll caught salmon in the Fishery Conservation Zone (FCZ). The primary and major management responsibility for all salmon species lies with the State of Alaska and does not occur in the FCZ. Consideration at this time of any species other than those anadromous salmonids would be both speculative and unproductive in terms of realistic long range planning for the Council.

In addressing the questions of enhancement and rehabilitation, we are of the considered opinion, because of our unique system of fresh water river systems and marine estuaries, that priorities should be placed in stream and estuarine rehabilitation which would lead to an overall goal of the rebuilding of traditional, genetically viable salmon stocks. With full knowledge that the State of Alaska has endorsed the concepts of this Bill, we must caution any national aquaculture policy and plan to deal strongly in its priorities for rebuilding and rehabilitation of natural stocks. We also feel that the priorities and goals (and spending) should rest very heavily in the hands of those coordinating regional aquaculture policies for the State of Alaska.

In summary, Mike, we appreciate being kept informed of the developments of yours and the other aquaculture bills. I hope that the views of the Council will be of some help to you in understanding our broadest concerns as the North Pacific Council interfaces with the possibilities of aquaculture in the future.

Sincerely,

Harold Lokken Chairman

MIH