

M E M O R A N D U M

TO: Council, SSC, and AP members

FROM: Jim H. Branson  
Executive Director

DATE: June 18, 1986

SUBJECT: Salmon FMP

ACTION REQUIRED

Decision on FMP rewrite.

BACKGROUND

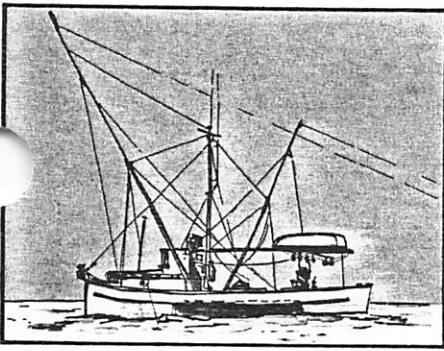
NMFS prepared a discussion document on rewriting the Salmon FMP which went out for public review on May 10. The plan team believes that federal management should continue, and that the FMP needs to be updated and revised. The plan team supports the need for management flexibility and therefore endorses Option 4, although some team members feel that total closure of the FCZ is the best option from a biological perspective. Closure of the FCZ was proposed by the original Plan Development Team in early drafts of the FMP, but it was rejected because of the economic impacts on some fishermen.

Five comment letters were received on the discussion draft, and these supported three of the five options (Options 3, 4, and 5). In addition, the Columbia River Tribes have requested that the final decision be postponed until December or January, after the U.S. and Canada have determined whether chinook stocks are meeting the rebuilding schedule. Adjustments to catch ceilings may be approved at that time. They also feel that it is not appropriate to take final action on troll salmon issues in Kodiak (instead of Southeast) and when the fleet is out fishing.

You received the Discussion Paper in a mailing in early May and we have not included the document in your notebooks. The five alternatives are summarized below:

1. Withdraw the FMP (and federal management). The state would not have authority to prevent new entrants from fishing in the FCZ, and a major fishery could develop. It may be possible to limit this expansion under the terms of the Treaty, which states that no new fisheries shall be allowed.
2. Make minor revisions to the FMP but not substantive changes. Management measures must be based on the best scientific evidence available, so the revision would need to at least meet this standard. If no major changes in the resource or fishery this approach might be sufficient for another few years.

3. Delegate management authority to the State (this still requires an FMP). Given the State's refusal to accept the king crab delegation of authority, it is doubtful that this is a viable alternative.
4. Make major changes to bring the FMP up to date and to provide greater federal management flexibility. This is a comprehensive rewrite which would require a major commitment by agencies with plan team members to ensure adequate staff support to accomplish this task within a reasonable time frame. The FMP would be provide a flexible management regime which would address treaty requirements and could respond to changes in the fishery and resource. Everything from objectives to the concept of MSY to inseason management would need to be addressed in the rewrite.
5. Close the FCZ to all <sup>Commercial</sup> salmon fishing. This proposal would in effect give nearly complete management authority of the salmon fisheries to the state (within state waters), but the cost would be dislocation of the Fairweather fishery and disruption of several troll drags which cross over into the FCZ. If the 3-mile line were strictly enforced, enforcement costs may increase. Offshore salmon fisheries are interception fisheries, and in general the farther offshore the higher the proportion of non-Alaskan stocks.



# Alaska Trollers Association

REPRESENTING ALASKA POWER TROLLERS

130 Seward St., No. 213  
Juneau, Alaska 99801  
(907) 586-9400

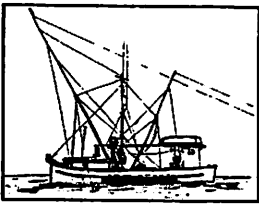
6/19/86

James O. Campbell  
Chairman NPFMC  
Box 103136  
Anchorage, AK 99510

Dear Mr. Chairman:

Our Association wishes to comment on the options before the Council regarding the salmon FMP. Certainly some action is required if you plan to remain within compliance of the National Standards discussed under Section 301 (a) (7) of the FCMA. The continuance of the status quo certainly does not promote compliance since a new Federal regulatory group, directed under an International Treaty, has assumed management of this fishery. This new Pacific Salmon Commission encompasses coast wide jurisdiction, and is designing guidelines for the management and rebuilding of the stocks coast-wide. Such an entity is certainly much closer to the actual issues affecting the salmon fishery than the Council whose direction is focused on ground and shellfish in the Gulf and Bering Sea. As you are well aware, the Council must still allocate time, money and staff toward the salmon FMP until a new alternative can be initiated. We are puzzled that in times of massive Federal deficits, that not only the Federal bureaucracy is dealing with this fishery on more than one level - all the same players have to attend all the same meetings -, but also the private sector is being forced to cover these issues on more than one front. For the salmon industry, this includes not only developing a working relationship with the Pacific Salmon Commission, but working through the Alaska Board of fish also. If we were to totally ignore the forum of the NPFMC, under option 4 we would be leaving a forum open to individuals from the lower 48 who have sought control of our fishery for allocative reasons, we would certainly be shirking our responsibilities. To allow those individuals more than one forum on the same issue would be encouraging "end runs" where none were ment to occur under the negotiated treaty or the FCMA.

Of the five alternatives, Number three appears to be the most rational in deleting duplication between Federal regulatory groups. If the State can be encouraged to formally take up the mantle of management, with its direction from the Pacific Salmon Commission, the concerns of the Council will be addressed. The Council's main concern, seeing that another Federal management organization is



Alaska  
Trollers  
Association

overseeing the salmon fishery in Alaska, should be: 1) reducing duplication of effort and 2) ensure that if the new Pacific Salmon Commission were to ever be desolved (ie. the Treaty desolved) then the Council needs the ability to step back in to the drivers seat in the Federal zone. The suggestion of Alternative 5 is totally untenable for Alaska. Though most of our fishing occurs within State waters, many of our most productive troll drags weave back and forth between the State and Federal zones. The actual enforcement of this option would be exceptionally expensive and would be a negative gain to the nation. More importantly, environmental years occur, such as 1983-84, where the coho salmon, which are directly managed by the State, laid 12 - 15 miles offshore for a month or more. If we were unable to fish within the FCZ the ability to fully utilize this resourcs would not have occurred and the social-economic impacts would have been catastrophic.

Whichever alternative the Council decides upon, I sincerely hope it addresses the above mentioned concerns.

Respectfully,

A handwritten signature in cursive script, appearing to read "Earl E. Krygier".

Earl E. Krygier  
Executive Director

EEK/md