

December 5, 1976

The Honorable Elliot Richardson  
Secretary of Commerce  
Main Commerce Building, Room 5851  
Washington, D.C. 20230

Dear Secretary Richardson:

The members of the North Pacific Fishery Management Council in their review of the Draft Environmental Impact Statement/Preliminary Fishery Management Plan Troll Salmon Fishery of the Pacific Coast, are very concerned with wording in Section 1.3.3.1 which assigns responsibility for preparation of the Management Plan for this fishery to the Pacific Fishery Management Council. The North Pacific Council requests that the preparation of the Troll Fishery Management Plan be a joint responsibility of the Pacific Council and the North Pacific Council for the following reasons:

- (1) The management of chinook stocks harvested by the troll fishery will involve actions affecting the troll fishery conducted in waters under the jurisdiction of the State of Alaska. It is recognized that a substantial portion of the Alaskan troll catch of chinook salmon is taken from stocks originating in rivers outside of Alaska, although certain Alaskan chinook stocks also contribute to the catch.
- (2) Available information indicates that the troll catch of coho salmon along the Alaskan coastline is composed primarily of fish of Alaskan origin, with some contribution from streams in northern British Columbia.

- (3) Any management decisions affecting the Alaskan troll fishery will affect the economics of the substantial fishing industry in Alaska.
- (4) Any meaningful plan to manage the Pacific Coast troll fishery will have to include the Canadian portion of this fishery. Settlement, possibly through treaty, of the U.S.-Canada interception problem will be necessary before this inclusion can be made.

Section 304 (f) of the Fisheries Conservation and Management Act provides that fishery management plans may be prepared jointly by two Councils when a fishery extends beyond the geographical area of any one Council. Your designation that the Pacific Coast troll salmon plan be prepared jointly by the Pacific and North Pacific Councils will assure the development of a sound plan in conformance with all requirements of the Act.

Sincerely,

Elmer Rasmuson, Chairman  
North Pacific Fishery  
Management Council

prepared by James W. Brooks, Commissioner, ADF&G

ERasmuson:fmm 12/6/76, Anchorage, AK