

November 22, 1976

TO: Members;  
North Pacific Fisheries Council

FROM: Ketchikan Alaska Trollers Association  
Box 825  
Ketchikan, Alaska 99901

Gentlemen:

Enclosed is a copy of the Ketchikan Alaska Trollers Association comments on the Draft - Pacific Coast Troll Fishery Plan - which we are forwarding to the Regional Director, NMFS.

We are discouraged that this plan was made without the input of the North Pacific Fisheries Council, especially in light of the fact that the majority of the stocks that Alaskan trollers fish on are Alaskan salmon. We feel that because the North Pacific Council was not involved, many errors in statistics and conclusions were made. We also feel that we have the right to expect that the North Pacific Fisheries Council and its advisors will have an equal say in determining the future of Alaska's troll fishery.

Sincerely,



Ketchikan Alaska Trollers Assoc.  
Southeast Alaska Trollers Assoc.

To: Regional Director  
National Marine Fisheries Service  
NOAA/DOC  
1700 Westlake Ave. North  
Seattle, Wash. 98109

From: Ketchikan Alaska Trollers Assn.  
Box 825  
Ketchikan Alaska 99901

Subject: DRAFT ENVIRONMENTAL IMPACT STATEMENT / FISHERY MANAGEMENT PLAN  
Troll Salmon Fishery of the Pacific Coast

Dear Sir;

Enclosed is a copy of the Draft Troll Fishery Management Plan that we have underlined in areas that we feel need correction, revision or comment. Of primary concern to our organization are the facts that:

1. (1.3.3.1) The Pacific Council had the responsibility for preparation of the management plan without equal input from the North Pacific Management Council or its resources.
2. The Management Plan for the Troll Fishery is actually no plan at all and perpetuates the expansion of the Canada Troll Fleet at the expense of U.S. fishermen.

As we analyzed the Draft we found that corrections, revisions, or comments were needed on the following paragraphs:

Page 32, 2.1.2

This paragraph explaining the King and Coho sport catches in Alaska is misleading because of the following reasons:

1. 1973 figures came from a Boeing Economic Survey that the ADF&G considers to be incorrect.
2. These are statewide figures that include the Cook Inlet fishery. 1974 and 1975 figures reflect a downward trend because of massive closures in Cook Inlet. It is important to note that the Cook Inlet sport fisheries are the largest sport fisheries in the state and exploit fish that are almost never exploited by a Troll Fishery.

Page 38, 2.1.3.

The figures on troll licenses in Alaska are misleading because they do not distinguish between the Commercial Power Troll Fleet and the Sport Commercial Hand Troll Fleet. Historically the Alaska Commercial Troll fleet has remained constant at around 1,000 boats with quite a lesser number actually being active in any one year. The Sport Commercial Hand Troll fleet who are primarily week-end fishermen has shown substantial increases in recent years because of the following reasons:

1. There is no catch limit and the fish can be sold.
2. They use their commercial license to buy their fuel at a discount.
3. They use their sport boats as a tax write off.
4. Commercial licenses are very cheap.

Historically this fleet has contributed only a small percentage to Alaska's total Troll catch.

Page 41.

It is very discouraging for Alaska Trollers to read of the increased efficiency of the Pacific Troll Fleet because we know that this has occurred everywhere except in Alaska. This is because Alaska Trollers are restricted to only 4 lines inside the three mile limit. Unlike the other states and Canada, Alaska's Troll Fishery occurs inside the three mile limit with the exception of the Fairweather Grounds. This 4 line restriction has also kept the size of our vessels from increasing over the years.

Figure 8.

Concerning interceptions of salmon between Alaska and Canada the balance shown in Figure 8 is in Alaska's favor only because the ADF&G and the NMFS have made no effort to find and evaluate Canada's interceptions of Alaska's fish. Furthermore, Canada has not been totally honest and has expanded interception fisheries in the Portland Canal and Dundas Island areas. Unfortunately we do not have a measurement on these problems. A good example of the poor data that we receive from Canada on interceptions of Alaska's fish is exemplified on page 45 where Canada's Troll effort in Alaska's off shore waters is illustrated. Any troller who has spent any time on the Fairweather Grounds could tell you that these figures are extremely low. An example is year 1974 where 34 boat days is shown. These figures are being used in the measurements for figure 8 but have never been challenged by the U.S. delegation during negotiations. Why would Canada have such incorrect figures? Obviously because the Canadian Fishermen landing their fish from the Fairweather cannot sell their Kings smaller than 26 inches unless they say they came from inside Canada. Further it strengthens their position in negotiations.

Page 48, 2.1.5.

We wish to take strong exception to the statement that Canada conforms and point out that:

1. Canada does not enforce its 26 inch limit on outside waters and therefore does not have a limit. Never have any of our members observed BC trollers shaking small fish. The U.S. recognizes and enforces the 26 inch limit.

2. Canada has no restrictions on number of lines fished while Washington is restricted to 6 and Alaska to 4. Canadians have been observed fishing as many as 12 lines. Obviously a troller's efficiency is related to the number of lines fished and has a direct bearing on the size of the vessel that would be efficient in the fishery.

Page 50, 2.1.6.

Concerning the "History of Cooperative Research and Statistical Exchange" we have already pointed out problems resulting from this exchange on Figure 8. We would further like to bring to your attention the Alaska Position concerning the Bilateral talks. We are enclosing *not included* a copy for your perusal. It is generally recognized by Mr. McKernan that research and statistics in the northern sector (northern BC and Alaska) are totally lacking or unusable.

Page 59, 2.2.2.

Alaska's history in the troll fishery we feel disputes the contention that we are totally unmanageable and dangerous. Alaska's share has been constant for many years through regulation. Furthermore, the Alaska Troller has provided science with much of the ocean research on salmon and will in the future play an even greater role in this research.

Page 60, 2.3. Page 62, 3.2.

The sentences underlined in these two paragraphs are extremely strong arguments for adopting Alternative Plan 6.1 "Eliminating the Canadian Fishery". It is our belief that Alaskan would not receive similar treatment from Canada if the status quo were retained. The draft noted in the text that in recent years U.S. Trollers have quit fishing the Canadian coast. There is a good reason for this. That is that the Canadian Govt. has been extremely hard on U.S. fishermen forced into Canada by weather.

Page 65, 5.2.2.

The statement underlined in this paragraph is obviously false when the U.S. 26 inch limit is considered. We would like to point out further that there have been no studies made on mortality at sea due to natural predation, disease and loss to foreign draggers to show that it is more advantageous to catch salmon as spawners. Irregardless, troll caught salmon bring such a high price that the loss in weight is more than offset by the high price.

Page 66, 5.2.2.

It is generally recognized that Alaska has no shaker problem.

Page 68, 5.4.

We feel that the 200 Mile Commissions have the responsibility to inact this "legislation" as it was intended. U.S. Trollers are already being restricted from Canada. Any negotiations with Canada from this time on should reflect the will of Congress through this law. The only U.S. fishermen who might gain from this inaction would be U.S. draggers and this would be only short term. We also feel that circumventing this law through inaction at the direction of the State Dept. would be a dangerous precedence that could be further damaging to U.S. fishery interests.

Page 69, 6.1.

It is the opinion of this organization that the North Pacific Commission and the Pacific Commission jointly approve Alternative Plan 6.1. Elimination of the Canadian Fishery.

Page 70, 7.0.

The paragraph underlined spells out who will pay in both the short run and long run if no action is taken. The Canadian Troll Fishery will continue to expand at the expense of the U.S. people.

SUMMARY.....

In summary this organization finds that this Draft is lacking in the descriptions of the History of Alaska's Exploitation, Alaska's vessels and Gear Employed, Alaska's part in Competition for Stocks and The History of Management, expecially in regard to Canada's willingness to conform to coastwide regulations. We also disagree in general with the Draft recommendations.

The Ketchikan Alaska Trollers Assoc. recommends the following action be taken:

1. That the Draft Management Plan for the Troll Fishery be reviewed jointly by the North Pacific Fishery Council and the Pacific Fishery Council.
2. That Alternative Plan 6.1., "Elimination of the Canadian Fishery" be recommended and inacted.

Sincerely,

*J. B. Colant*  
Ketchikan Alaska Trollers Assoc.  
Southeast Alaska Trollers Assoc.