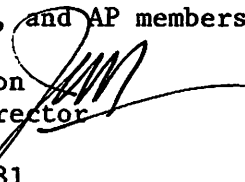


M E M O R A N D U M

TO: Council, SSC, and AP members

FROM: Jim H. Branson
Executive Director 

DATE: March 20, 1981

SUBJECT: Final Action on Salmon Amendment #2

ACTION REQUIRED

Final action on all proposals.

BACKGROUND

In January the Council and the Alaska Board of Fisheries met jointly to discuss regulations for the 1981 troll fishery and changes to the High Seas Salmon FMP. The Board and Council concurred on several proposals but some major differences remain. The preferred alternatives accepted in January were incorporated into the draft amendment, draft Supplemental EIS, and draft Regulatory Impact Analysis (RIA), which were submitted to the Secretary for review. The Council must now make their final decision on the amendment package, which includes both the regulatory changes and a new set of FMP objectives. An outline for the tentatively preferred actions and their alternatives are included as Agenda Item E-1(b).

List of Attachments

- E-1(b) Summary of Salmon Proposals
- E-1(c) Letter on hand troll issues from Robert Stanker, Ketchikan
- E-1(d) Limited Entry Qualification Proposals
- E-1(e) Summary of Juneau Public Hearing, January 1981
- E-1(f) Alaska Trollers Association Economic Analysis
- E-1(g) United Fishermen of Alaska, Resolution 81-3

SUMMARY OF SALMON PROPOSALS

I. MANAGEMENT OBJECTIVES

A. Present Objectives

1. Control the expansion of the salmon troll fishery in the Fishery Conservation Zone.
2. Allocate the salmon resource among user groups without disrupting present social and economic structures.
3. Regulate the catch of salmon to assure adequate escapement for spawning.
4. Reduce the catch of salmon with potential growth to increase the poundage yield from the troll fishery.
5. Make cost effective the public investment in the high seas salmon fishery.
6. Promote the eventual development of a Pacific Coast salmon fishery management plan.

B. Proposed Objectives

1. Manage the troll fishery in conjunction with other Southeast Alaska fisheries to obtain the number and distribution of spawning fish capable of producing the optimum total harvest on a sustained basis from wild salmon stocks harvested in Southeast Alaska.
2. Allocate the optimum yield to the various Southeast Alaska user groups as directed by the Alaska Board of Fisheries and North Pacific Fishery Management Council.
3. Decrease directed and incidental harvest of smaller, immature fish and reduce sublegal chinook hook/release mortalities where possible, consistent with allocation decisions and with the objective of maximizing benefits to user groups.
4. Control and reverse recent trends of expanding effort and catch in outer coastal and offshore Southeast Alaskan waters to accomplish conservation goals.
5. Develop fishery management techniques which will allow full utilization of salmon returning to supplemental production systems while providing necessary protection for intermingling natural runs which must be harvested at lower rates.

6. Work towards the development of an integrated coastwide management plan for chinook salmon.

II. REGULATORY PROPOSALS

A. Problem: Continued Increased Effort in Catch of Depressed Chinooks Offshore

1. Optimum Yield (OY)

- a. Status Quo (286,000 to 320,000 chinook salmon)
- b. 10% reduction (257,000 to 288,000)
- c. Proposed action: 15% reduction (243,100 - 272,000)
- d. Greater reduction

The Board tentatively approved a harvest guideline of 272,000 - 288,000 chinook salmon, which represents a 10-15% reduction.

2. Chinook Season

- a. Status Quo (April 15 through October 31)
- b. Proposed action (May 15 through September 20)

The Board concurred with the proposed action.

3. Coho Season

- a. Status Quo (June 15 through September 20)
- b. July 1 through September 10
- c. Allow fishing for other species during closures.

The Council and Board accepted the status quo.

4. Area Closures

- a. Close the outer FCZ beyond a geographic baseline measured from the surf line.
- b. Exempt the Fairweather grounds.
- c. Close the entire FCZ.
- d. Status Quo (entire FCZ east of Cape Suckling open)

The Council tentatively approved the status quo.

5. Gear Restrictions

- a. Status Quo: 6 lines north of Cape Spencer, 4 lines south of Cape Spencer for power troll.
- b. 4 operating gurdies for power troll, 2 gurdies or 4 sport lines for hand troll.
- c. Treble hook ban

*Keep
Bk's def
to ban it*

The Council tentatively approved current state regulations, which they understood to include 2 gurdies or 4 sport lines for hand trollers. The Board approved a 1 gurdy or 4 sport line limit. (A letter discussing the merits of the 1 line regulation is included as agenda item E-1(b).)

The Board also accepted the treble hook ban. The Council did not.

B. Reporting Requirements

- 1. Status Quo: All fishermen must report catch within five days after landing out of state.
- 2. Proposed action: All fishermen must submit fish tickets or equivalent document before leaving Alaska waters with salmon on board.

The Council and Board concurred on reporting requirements.

C. Heads-on Landing Requirements

- 1. Status Quo: All troll-caught salmon will be landed with heads-on.
- 2. Proposed action: Heads will be retained on fin-clipped fish only.

The Council and Board concurred on this proposal.

III. LIMITED ENTRY

Limited entry has been separated from salmon Amendment #2. A discussion of qualifying criteria can be found under agenda item E-1(d). The Council members received a report from the Coast Guard at the February meeting which provided an estimate of the cost of enforcing an FCZ limited entry program. They estimate it would cost \$1 million annually to effectively enforce a separate limited entry program.

Clem Tillion
North Pacific Fishery Management Council
P. O. Box 3136DT
Anchorage, Alaska 99510

MAR 10 1981

AGENDA E-1(c)
March 1981

ACTION	ROUTE TO	IN
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	Staff Asst. 10	
	Staff Asst. 11	
	Staff Asst. 12	

MARCH 4, 1981

DEAR SIR:

We understand that there is considerable pressure on the board of fisheries and the S.E. legislators to remove the Hit Gear Reduction Regulation which was adopted in JAN of this year by the fisheries board.

We feel that the board's decision was fair, equitable and justified because of the following reasons:

- ① it applies to ALL Hand trollers
- ② it removed the band & weekly closures.
- ③ it removed discriminating time and area closures between H.t.'s and H.t.'s and power trollers.
- ④ it decreased permit speculation.
- ⑤ it devaluated the permit.
- ⑥ the board accepted the 2150 Limited Entry permits and point system for Hit permanent permit system.
- ⑦ it will return 7 day a week hand trolling to traditional and customary areas
- ⑧ it is more in line with the views and perspective of the other Gear Groups that compete for salmon.
- ⑨ it will stabilize the salmon allocations and quotas granted H.t.'s.
- ⑩ most of all, it is a conservation measure, which at the present time and the near future, is in very much demand.

LOCAL REACTION FROM H.T.'S DURING CASUAL CONVERSATIONS INDICATE OVER 90% FAVOR THE GEAR REDUCTION REGULATIONS, PARTICULARLY THE OLDER LONG TIME PARTICIPATING H.T.'S WHO HAVE A HISTORY OF CONTINUOUS PARTICIPATION OF 10-20 30 AND EVEN 60 YRS. OF H.T. . AT THE JOINT MEETING IN JAN. THE NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL SUGGESTED 300 H.T. PERMITS BUT THE BOARD WOULD ALLOW 600, AT THE PRESENT TIME THIS WOULD SHUT OUT AN AWFUL LOT OF PEOPLE. IN ORDER TO COMPENSATE FOR THE LARGE NUMBER OF PERMITS, 2150. A SOLUTION WAS NEEDED FOR THIS IMBALANCE. THE GEAR REDUCTION REGULATION WAS NECESSARY IN THAT IT WOULD EQUALLY PERTAIN TO ALL PERMITS AND ALL HAND TROLLERS ALIKE. WE ALL KNOW THAT THE NEWLY INTRODUCED, LARGE EFFICIENT OCEAN GOING, 7 DAY A WEEK (SOME WITH PLUG IN GURDY POWER) HAND TROLLERS WERE CONTRIBUTING TO 95% OF ALLOWABLE H.T. SALMON QUOTA THIS TYPE OF VESSEL AND ITS POTENTIAL ARE NOT THE INTENT OF HAND TROLLING. AND CANNOT BE JUSTIFIED, WHILE TRADITIONAL AREAS, GEAR, AND HAND TROLLERS WITH TYPICAL TRADITIONAL SMALL BOATS WERE PENALIZED WITH CLOSURES.

WE FEEL THAT THE BOARD AND OTHERS WILL RECEIVE SOME UNFAIR CRITICISM FOR MAKING

this type of HARD decision, But they MADE IT, AND
IN VIEW OF THE POTENTIAL, AND UNMANAGEABLE
RECENT HISTORY OF HANDTROLLING, WE ARE SURE THAT
IT WILL EVENTUALLY WORK OUT FOR THE BEST, AND IN
THE BEST INTEREST OF HANDTROLLING CONSERVATION AND
ALL INVOLVED. WE SUPPORT THE BOARD'S DECISION, AND
RECOMMEND THAT POWER TROLLING IS AVAILABLE TO THOSE
THAT INTEND TO EXPAND THEIR FISHING DESIRES.

Sincerely

ROBERT STANKER (Representative)

PRE-1978 HANDTROLLERS ASSOCIATION

P.O. BOX 5260 KETCH, ALASKA 99901

Copies to:

BOARD OF FISHERIES

ALASKA TROLLERS ASSN.

SEINERS ASSN (Ketch)

CLEM TILLION N.P.F.M.C.

ROBERT H. ZEIGLER

ORAL E. FREEMAN

TERRY GARDINER

RICHARD T. ELIASON

BILL RAY

JIM DUNCAN

BEN F. GRUSSENDORF

E. J. HAUGEN

M E M O R A N D U M

TO: Council, SSC, and AP members
FROM: Jim H. Branson
Executive Director
DATE: March 20, 1981
SUBJECT: Limited Entry Qualification Proposals

DISCUSSION

We received a computer printout of the number of hand troll and power troll permit holders who landed fish caught in the FCZ or outer districts during 1975, 76 and 77. Based on the criterion that a fisherman must show fish tickets for FCZ-caught fish for at least two years during this three-year base period, the following numbers of troll fishermen would qualify for FCZ limited entry permits.

HAND TROLL				<u>Number of Permits Landing FCZ Fish in those years</u>
<u>1975</u>	<u>1976</u>	<u>1977</u>		
	x	x		59
	x	x		13
	x			38
(all 3 years)	x	x	x	<u>46</u>
			Total	156

If, in addition, these fishermen must hold a current Alaska permit, the total would probably be lower.

POWER TROLL				<u>Number of Permits Landing FCZ Fish in those years</u>
<u>1975</u>	<u>1976</u>	<u>1977</u>		
	x	x		83
	x	x		53
	x			48
(all 3 years)	x	x	x	<u>287</u>
			Total	471

As with hand trollers, this total would probably be lower if fishermen must also hold a current permit.

SUMMARY: COUNCIL/BOARD OF FISHERIES PUBLIC HEARING
ON AMENDMENTS TO THE TROLL SALMON FMP
January 5 - 7, 1981
Juneau, Alaska

A public hearing on the 1981 amendments to the Troll Salmon FMP was held in conjunction with the joint Council/Board of Fisheries meeting in Juneau, January 5 - 9, 1981. Members of the public in attendance included those attending the joint meeting. Synopses of individual testimony are given below.

JIM CANARY, Chairman of the Ketchikan Advisory Committee, recommended a maximum of 600 hand troll permits if a limited entry system were implemented, and discussed hand trolling in the Ketchikan area in general.

BOB LOOMIS, hand troller from Sitka, opposed the two-line limit and CFEC's proposal to issue 2,150 hand troll permits. He felt the two-line limit would make hand trolling a part-time fishery.

BILL STOKES, Chairman of the Sitka Hand Trollers Association, said that hand trollers consider themselves commercial fishermen. He advocated the four line, two gurdy configuration to promote maximum participation in the fishery. He urged the Board to consider the National Standards to assure that policies established are not discriminatory. He said that hand trollers demand no more -- and no less -- than equality.

JOHN MURRAY, Sitka, said the CFEC proposal for 2,150 hand troll permits is not indicative of the communities involved and would make entrance into the fishery economically unfeasible. He supported the ban on treble hooks.

ERIC JORDAN and GARY ERB, representing themselves and the Sitka Advisory Committee, favored the two-line limit, limited entry for hand and power trollers combined, based on prior participation in the fishery, and management of the fisheries as a single unit. They opposed the 20/80 allocation split, and said that if the allocations are continued, hand trollers should receive from 25% to 35%. They suggested that a buy-back program be implemented in conjunction with the limited entry program. They favored the ban on treble hooks and a later opening date for the coho season for all areas except Ketchikan.

LINDA DANNER, Juneau, said that 2,150 hand troll permits were too many and felt that CFEC is relying on the buy-back program too heavily to compensate for mismanagement of the fishery. She proposed establishment of a separate fishery for rural areas and supported the ban on treble hooks.

PAT GARDNER, of Craig, Alaska, endorsed the CFEC proposal.

ROD DARNELL, Juneau power troller, felt that an OY of 300,000 would eliminate the need for other regulations. He suggested setting an OY for coho as well.

D. W. FINDLEY, Secretary/Treasurer of the Juneau Hand Trollers' Association, advocated doing whatever is necessary to conserve the resource, but stressed that hand and power trollers should be treated equally in suffering the effects of any conservation measures employed.

LARRY COTTER, representing ILWU - Juneau, opposed the reduction in OY because of the probable socioeconomic impacts on the communities of Pelican and Elfin Cove. He felt that Alaskans should not be asked to bear the brunt of the damage done by the Canadians.

RAYMOND DICK, WALTER FRANK, RON WILLIAMS, JOE HOTCH, DANIEL PAUL, and BILL THOMAS, representing the Alaska Native Brotherhood, opposed CFEC's proposal and felt that hand and power trollers should be regulated as a single unit. They said that if limited entry were inevitable, however, they would favor 2,150 permits as a means to include rural residents and villagers in the fishery. They opposed the use of treble hooks and said they would go along with the 10% reduction in OY if the Regional Director had authority to adjust OY based on the run size.

LARRY GAMMON, Elfin Cove fisherman for eight years, stressed the economic dependence of his community on the troll fishery. He preferred no change in OY for 1981. He said there is concern among U.S. fishermen about the number of salmon being taken by the foreign offshore trawl fleet in the Gulf.

WILBUR JOHNSON and CHIP McCONNOHAY, representing the Columbia River Inter-Tribal Fish Commission, supported the Washington Department of Fisheries' suggested 24% reduction in OY to prevent depletion of the Columbia River bright stocks. They also recommended that catches be documented before leaving Alaskan waters; supported the heads-on landing requirement; and asked the Council to work with the Pacific Council to develop a coastwide salmon FMP.

LONNIE THOMAS, purse seiner from Craig, favored the CFEC proposal.

GORDON WILLIAMS, five-year hand troller from Angoon, said that CFEC's proposal is feasible only if distinctions for class and gear types are made. He suggested two classes for hand trollers: one for those who troll for their living, and one for recreational trollers. Without those distinctions, he predicted disaster.

VAN BAKER, troller and purse seiner for 22 years, said that the reduction in OY would make people start fishing earlier and push harder to get the first 288,000 fish. He supported the ban on treble hooks and reporting before leaving Alaskan waters.

ROBERT STANKER, Ketchikan hand troller, was concerned about the foreign trawlers' interception of salmon and halibut. He said the late opening and early closure would adversely affect hand trollers who depend on the fishery for their living.

TOM JACOBSEN, Point Baker hand troller, advocated combining the hand and power troll limited entry systems to regulate the fishery as a single unit. He said that CFEC's proposed point system would not accurately reflect true hardship cases.

STEVEN MEYER, ten-year troller from Pelican, said the PDT's proposed changes to the plan objectives did nothing more than obscure them. He opposed the reduction in OY, heads-on requirement, and banning of treble hooks.

LARRY CALVIN, Chairman of the Sitka Advisory Committee, preferred a later closing date for the coho season and supported the ban on treble hooks and gear restrictions. He urged the Board to do a detailed study on the effects of a buy-back program.

LUNCINDA HITES, Skagway hand troller, said the proposed gear restrictions for hand trollers and the 80/20 allocation split were discriminatory and in violation of the National Standards. She said the Board has not lived up to its obligation to morally and ethically manage the state's fisheries. She opposed CFEC's proposal for 2,150 hand troll permits.

KEN PROCTOR, representing the Sitka Hand Troll Association, opposed any allocation between the hand and power troll fisheries and suggested taking the catch from the winter troll fishery off the next year's OY. He also addressed various Board regulatory proposals unrelated to the Council's proposals.

PAT MILLARD, Juneau fisherman, opposed gear restrictions, particularly in the Fairweather Grounds, and the ban on treble hooks. He said that treble hooks rust away quickly and do less damage to shakers than single hooks. He opposed the 10% reduction in OY because of prior measures which trollers have been forced to take for conservation reasons and cited the Columbia River dams as the culprit in the problem with the bright stocks.

GAIL GOOD, Juneau fisherman, supported the 80/20 split for power and hand trollers and opposed any limited entry system for outside waters. He opposed the reduction in OY; suggested mandatory observers on all foreign trawlers to help deter interceptions of cohos and chinooks; wanted longer and later seasons; favored heads-on for fin-clipped fish only.

JOHN WILCOX, of the Juneau Hand Troll Association, was concerned about the accuracy of ADF&G's estimates of salmon taken in the foreign trawl fishery. He felt that many more fish are actually taken than estimated. He supported CFEC's proposal for 2,150 hand troll permits to encourage entrance into the fishery.

DAN REAR, representing the Pelican Advisory Committee and the City of Pelican, addressed the economic effects of the proposed 10% reduction in OY for that community, and advocated no reduction for 1981. He said that Columbia River dams are the single most devastating factor for Columbia River bright stocks.

WALT PASTERNAK, Sitka power troller, thanked the Board and Council for the opportunity to testify. He recommended the status quo on OY for 1981 and either the elimination of all foreign trawling in the Gulf of Alaska or 100% observer coverage for those vessels.

PAUL JOHNSON, fisherman from Elfin Cove, advocated closing the Gulf of Alaska to all foreign trawling to protect salmon stocks.

BARRY McCLELLAN, Ketchikan troller, said any reduction in OY would be economically devastating for fishermen who rely on trolling for 100% of their income. He felt that single hooks do more harm to small fish than treble hooks and that delaying the chinook season opening discriminates against small boat fishermen.

CHUCK PORTER, Juneau, suggested institution of predator control measures in all major spawning areas. He suggested the possibility of "paying off the Columbia River Indians" as a method for dealing with the Columbia River bright stocks. He said that use of treble hooks or single hooks is a matter of choice, and that neither is preferable over the other.

DAVE PITCHER, power troller, supported the 80/20 allocation split between hand and power trollers. He said the proposed closures would provide only minimal relief to salmon stocks while skewing the data necessary for in-season management.

LAIRD JONES, of the Alaska Native Brotherhood, said that further research is needed before the OY is reduced. He supported the ban on treble hooks.

ANNA BRIESMAN, Pelican, said that trollers are worried about the proposed cutbacks because of the serious economic effects on villages such as Pelican.

DON NASH, representing the City of Pelican, addressed the employment situation in Pelican and the probable effects of the proposed OY reduction. He opposed further gear restrictions, and offered his boat and room and board if the State wished to put an observer aboard to gather statistical information.

PAUL HEARD, full-time hand troller, opposed CFEC's limited entry proposal because it would make it impossible for trollers to depend on the fishery for 100% of their livelihood. He said that if the limited entry system is inevitable, then classes of hand trollers must be distinguished.

CHARLIE JIM, SR. and GABRIEL GEORGE, Angoon, opposed limited entry in any form for hand trollers because it would ruin a historic culture. They suggested area registration as a possible solution to the problem and asked the Board to publish all testimony received so the public could review it.

CLINT BUCKMASTER, representing himself, supported the ban on treble hooks. He opposed the reduction in OY as long as the Canadians did not sacrifice equally. He suggested moving the surf line to 10 or 12 miles offshore with no fishing beyond that point. He proposed that trollers register in 2 of 4 possible areas for a given season, and that they be "stuck" with area in which they are registered.

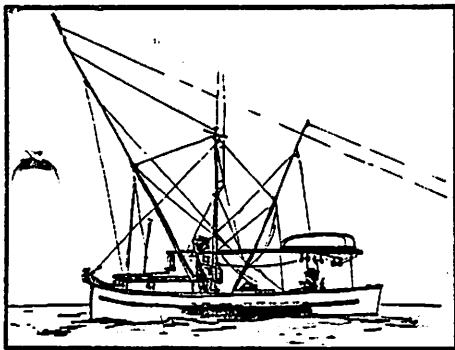
DOUG BARNES, Sitka hand troller, opposed CFEC's proposal for limited entry and said that the number 2,150 was arbitrarily chosen without proper supporting data.

JALMAR SZAVICO, power troller since 1930, described hand trolling in the early days and urged hand trollers to stop fishing when their 20% quota is reached.

LEWIS SCHNAPER, SCOTT STAFNE, ERIC McDOWELL, BRUCE BACHEN, et al, representing the Alaska Troll Legal Fund, presented written information to support their opposition to the proposed 10% reduction in OY. They said that the Washington Department of Fisheries computer model's findings are not verified by the catch rate statistics for the bright stocks. ERIC McDOWELL submitted a written report on the socioeconomic impact of the salmon power troll industry in Southeast Alaska. He stated that power trollers provided \$15 million to the economic base of Alaska in 1980, whereas hand trollers provided only \$5 million. The group supported the 80/20 allocation split between hand and power trollers and opposed the ban on treble hooks.

RICHARD LUNDAHL, representing the City of Pelican, suggested that elimination of the minimum size limit for chinooks would solve the OY problem. He said approximately 16% of all chinooks caught are shakers. By allowing the shakers to be kept, the total chinook harvest would be reduced by 16%. He said the FMP does not address chinook mortality caused by the Columbia River dam system and urged that this aspect be included in the FMP.

JOSEPH RIEDERER, Juneau, expressed concern over the number of salmon caught by foreign trawlers in the Gulf of Alaska. He said that in early August near Icy Bay almost 10% of the fish he caught were net-marked.



Alaska Trollers Association

AGENDA E-1(f)
March 1981

REPRESENTING ALASKA POWER TROLLERS

205 North Franklin Street
Juneau, Alaska 99801
(907) 586-9400

March 9, 1981

Dear Council Member:

Attached is a copy of a letter we've just received from Eric McDowell, the Juneau economist who did the socio-economic study of the troll fishery which was presented to you at the January meetings.

McDowell's conclusions are disturbing. He finds that the average economic costs to fishermen of your proposed 15% OY reduction will actually be 19% of their incomes, and more significantly, that this reduction represents the difference between operating costs and "take home pay."

I'd like to ask you to read this letter carefully. As we have said many times in the past, the power troll fleet is willing to accept any restrictions which are dictated by needs to conserve the resource, but all indications are that any fish let go by Alaska trollers will be taken by Canadian fishermen or the fleets in Washington and Oregon.

Indeed, current Canadian management proposals for their trollers appear to create a situation which will actually increase the Canadian catch of king salmon. By taking their big boats off of pinks, reds, and chums, and by not protecting kings, Canadian fishermen will certainly shift their effort to kings and cohos.

With these figures for the costs of this management action before you, please consider whether the benefits projected will in any way approximate these severe costs.

We suggest that the answer is NO, and that until assurances are given that the fish which we avoid will actually be allowed to pass through other fisheries to their breeding areas, this OY reduction is premature.

Sincerely,

Lewis Schnaper
Executive Director

LS:ne

HOMAN-McDOWELL

Economic and Management Consultants

Frank Homan
Eric McDowell
Peter McDowell

March 9, 1981

Lewis Schnaper
Alaska Trollers Association
205 N. Franklin Street
Juneau, Alaska 99801

Dear Lewis:

The following is a brief discussion of the income lost to power trollers as a result of the proposed King salmon OY reduction of 15%, to 272,000 from 1980 harvest levels. It is inaccurate and misleading for fishery managers and others to regard this as simply a 15% reduction. Even the most cursory analysis of the economic impact of the OY reduction should consider the following important points:

(1) The reduction of power troll King salmon catch will be over 19% rather than 15%. Seine and gillnet "incidental" catch are not likely to decline. Also hand troll effort on Kings is almost entirely prior to August 1, when the OY could be reached in a good year. A portion of the power troll fleet continues fishing on Kings after August 1 while hand trollers target almost entirely on cohos. If no additional gear, time or area restrictions are placed on hand trollers for the 1981 season, their catch of Kings is likely to be at least as much as 1980, especially since fishing effort is stabilized under the 80-20% guideline.

For these reasons it is reasonable to assume the OY will have no significant effect on seine, gillnet, setnet, hand troll or trap catch of King salmon in southeast in 1981.

If we assume the catch of other gear types remains at 1980 levels, then the entire OY reduction will be borne by the power troll fleet as shown in the following table:

Historical and Projected King Salmon Catch 1978-1981

Gear Type	1978	1979	1980	1981	% change	
					1978-1980	1980-1981
Power troll	321,050	279,187	248,292	199,500	-32.9%	-19.3%
All other	82,877	87,514	72,376	72,500	-12.5	0.0
	403,927	366,701	320,668	272,000	-28.7%	-15.2%

This table assumes all other gear types at 1980 levels but it could be more or less depending on fishing conditions. Based on recent years, winter conditions, and on escapement and hatchery release data, former ATA biologist Bruce Bachen indicates 1981 could be similar to the catches of the 1978-1980 period. This means power trollers will be taken off Kings earlier than expected.

(2) Income losses to power trollers will be greater than the 19% reduction in catch. Power trollers will be forced to forego King salmon caught in the late summer and fall. For several reasons explained below, these fish are much more valuable than those caught earlier in the season.

- Late season fish are larger. In some areas August and September Kings outweigh June fish by an average of 2-5 pounds or by 15% to 30%. This is due to summer food abundance, feeding patterns and migration trends.
- Late season fish are almost exclusively red in flesh color. Early season Kings are 5-15% white which sell for less than half price. Due to this factor alone, August fish are perhaps 5% to 7% more valuable than June fish.
- Prices are significantly higher in August and September than in early season. Dockside prices are commonly 15-30% higher for King salmon in late season than early season. For example, the 1980 price rose by 15% just from June 15 to August 15. For 1981, in-season price rises should be substantial due to no Kings in West Coast freezer storage, cutback in Japanese Bering Sea catches, and absence of trawlers off of SE Alaska. Power trollers will not benefit from these price increases under an OY if fishing is stopped in late July or early August.

(3) Power trollers will be forced to forego all or most of their "take home pay," even though the loss of income is only a portion of the total.

Sea Grant Program statistics show that the average troller in 1979 (a record year for prices and an excellent one for catch) took home about 21% of his gross income as the return on his labor and management. With lower prices and a 29% lower King salmon catch, the average power troller is now expected to take home nothing or even incur a loss for his efforts.

In other words, power trolling, which is an economically stable and healthy industry at recent catch levels, becomes a marginal economic venture at the proposed OY levels.

Since most costs of trolling are fixed costs (boat, gear, fuel, food, repairs) a significant reduction in gross income could have disastrous effects on many members of the fleet.

Income Loss to Power Trollers

Loss of Income to Power Trollers
as a Result of 15% OY Reduction

	<u>1980</u>	<u>1981</u>	<u>Income Loss</u>	<u>% Loss</u>
King salmon	\$8,065,300	\$5,726,400	-\$2,338,900	-29%
All other	<u>4,272,700</u>	<u>4,272,700</u>	<u>0</u>	<u>0</u>
	\$12,338,000	\$9,999,100	-\$2,338,900	-19%

Source: Commercial Fisheries Entry Commission,
preliminary 1980 data

If we assume the average late season King has 50% more value than early season Kings (+20% for size, +25% for price and +5% for color) then we can compute income loss for a 15% decrease in OY.

Power trollers will experience an actual income loss of over \$2.3 million or 29% of the value of their King salmon catch if the OY is reduced by 15%. This is derived by estimating power trollers will lose 19.3% of their catch and since these fish will be late season Kings their value is 50% higher. If the OY is reduced by 10% then King salmon income loss becomes approximately 20%.

CFEC data shows 65.8% of 1980 power troll income came from King catches. Using this data we find a 15% OY reduction results in a 19% loss of total income to power trollers, while a 10% reduction cost power trollers 13.0% of their season's gross income.

Readers should keep in mind these reductions are from 1980 levels, an average year, rather than from the higher catch levels of the late 1970's when average troller income reached \$21,594 compared to \$14,776 for 1980 and a projected \$11,975 for 1981. In addition the preceding estimates for 1981 assume effort will be allowed to continue for cohos after the King salmon OY is reached. Otherwise, income loss will be greater than estimated above.

As you can see, the costs to the individual fishermen are extreme, especially with respect to virtually eliminating

Lewis Schnaper

-4-

March 9, 1981

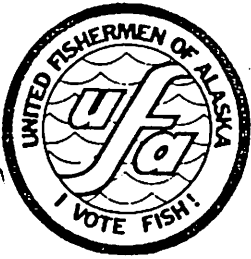
"take home pay." In researching the OY issue, I've been surprised to find no serious analysis of the severe social and economic impacts of the OY concept and the proposed reductions. For this reason we have been unable to analyze possible benefits which may otherwise balance out this dramatic change in fishermen's economic well-being.

Sincerely,

A handwritten signature in cursive script that reads "D. Eric McDowell".

D. Eric McDowell
Partner

UNITED FISHERMEN OF ALASKA



Rodger Painter
Executive Director

RESOLUTION 81-3
March 11, 1981

MAILING ADDRESS & OFFICE:
197 SOUTH FRANKLIN ST.
JUNEAU, ALASKA 99801
907 586-2820

WHEREAS, the United Fishermen of Alaska is an organization dedicated to the development of the commercial fishing industry in the State of Alaska; and

WHEREAS member fishermen of the organization fish for chinook salmon and herring along the coast and along the rivers of Western Alaska, including the Yukon, Kuskokwim and Nushagak Rivers; and

WHEREAS the fishermen of Western Alaska reside in one of the poorest areas of the nation, have the ability to harvest all of the available fishery resources, and rely upon these same resources for their subsistence use; and

WHEREAS these fishery resources which return to the waters of Western Alaska mature in the Bering Sea and are subject to incidental harvest by the groundfish trawl industry; and

WHEREAS the level of incidental harvest of chinook salmon by the trawl fishery has increased from 44,000 in 1977 and 39,000 in 1978 to over 100,000 in 1979 and 1980; and

WHEREAS this unacceptable level of incidental catch of Western Alaskan chinook salmon has been allowed to continue without any immediate remedial action after representatives of Western Alaska fishermen have petitioned the National Marine Fisheries Service, the U.S. Congress, and the North Pacific Fishery Management Council; and

WHEREAS this North Pacific Council will be considering a resolution of this issue at its March meeting,

NOW THEREFORE BE IT RESOLVED that the United Fishermen of Alaska strongly urge the North Pacific Fishery Management Council to take immediate, interim action to institute a time/area closure for foreign trawling from October 1 through March 31 in groundfish statistical areas Nos. I and II in the Bering Sea; and

BE IT FURTHER RESOLVED that the United Fishermen of Alaska believe that this is to be only an interim measure, taken at the Council's March meeting, to provide immediate relief to Western Alaska fishermen, but that also other approaches be developed to provide a satisfactory long term resolution of the incidental catch problem.

MAR 23 1981

PACIFIC FISHERY MANAGEMENT COUNCIL

526 S.W. Mill Street

Portland, Oregon 97201

Phone: Commercial (503) 221-6352

FTS 8-423-6352

SEARCHED	INDEXED	INITIAL
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FOR IMMEDIATE RELEASE		
March 20, 1981		

CHAIRMAN
E. C. Fullerton

EXECUTIVE DIRECTOR
Lorry M. Nakatsu

PACIFIC FISHERY MANAGEMENT COUNCIL SETS OCEAN SALMON SEASONS

The Pacific Fishery Management Council met in Renton, Washington on March 18-19, 1981, and tentatively adopted the following regulations for the 1981 ocean salmon fisheries:

TROLL FISHERY

CALIFORNIA (entire state)

All salmon except coho May 1-31
 All salmon June 1-15
 All salmon July 1-September 30
 Chinook minimum size limit: 26 inches
 Coho minimum size limit: 22 inches

OREGON/CALIFORNIA BORDER TO CAPE FALCON

All salmon except coho May 1-31
 *All salmon July 1-September 8
 Note: If there is an in-season closure on coho, then an all species except coho season will be allowed from Cape Blanco to Cape Falcon, with whole bait or 5" plugs only, starting at the time of the closure to September 8.
 All salmon except coho September 9-October 31
 Chinook minimum size limit: 26 inches
 Coho minimum size limit: 16 inches

CAPE FALCON TO US/CANADA BORDER

All salmon except coho May 1-31
 *All salmon July 15-September 1
 Chinook minimum size limit: 28 inches
 Coho minimum size limit: 16 inches

CAPE FALCON TO POINT LEADBETTER

Coho only September 20-October 3
 (maximum 10 boats with observers; coho gear only; out to 12 miles)

RECREATIONAL FISHERY

CALIFORNIA (entire state)

All salmon 2-fish bag limit February 14-November 15
Chinook/Coho minimum size limit: 22 inches, except that one chinook
or coho salmon per day may be less
than 22 inches but not less than 20
inches.

OREGON/CALIFORNIA BORDER TO CAPE FALCON

*All salmon 2-fish bag limit May 15-September 20
Chinook minimum size limit: 22 inches
Coho minimum size limit: 16 inches (entire state of Oregon)

OREGON/CALIFORNIA BORDER TO CAPE BLANCO

All salmon except coho 2-fish bag limit September 21-October 31

CAPE FALCON TO US/CANADA BORDER

*All salmon 2-fish bag limit May 23-September 7
EXCEPT 2+1-fish bag limit from Queets River mouth north to
US/Canada border (Areas 3 and 4)
Chinook minimum size limit: 24 inches
Coho minimum size limit: 20 inches (entire state of Washington)

*Subject to modification by in-season management provisions described below.

IN-SEASON MANAGEMENT

For the 43-day period ending on August 14 in the area from Cape Falcon
south and on August 28 in the area from Cape Falcon north

Separate harvest guidelines were established for the ocean troll and
recreational fisheries, based on the 1971-75 harvest ratios, as follows:

Washington Production Projection Area (WPP),
Cape Falcon to US/Canada Border

Total quota for area: 620,000 coho
Recreational allocation guideline: 40% or 248,000 coho
Troll allocation guideline: 60% or 372,000 coho

Oregon Production Index Area (OPI) South of Cape Falcon (including California)

Total quota for area: 772,000 coho
Recreational allocation guideline: 29% or 223,880 coho
Troll allocation guideline: 71% or 548,120 coho

When the separate harvest guideline is projected to be reached by either fishery, i.e., troll or recreational, that fishery would automatically close in the appropriate area, excluding California.

For the period after August 14 for the area from Cape Falcon south to Oregon/California border and after August 28 for the area north of Cape Falcon

In-season modifications may be made by the Regional Director following in-season procedures similar to those used in 1980 as follows:

- a. Adjust pre-season estimates of coho abundance, as appropriate, based on in-season data;
- b. Modify (shorten or lengthen) troll and recreational seasons and harvest guidelines for either area or any portion thereof, based on adjusted abundance levels, projected catch and effort levels, and harvest ratios between commercial and recreational fisheries.

TREATY INDIAN FISHERIES

Makah Area

All salmon May 1-October 31
Chinook minimum size limit: 24 inches
Coho minimum size limit: 16 inches

Quileute, Hoh, Quinault Tribal Areas

All salmon May 1-October 31
Chinook minimum size limit: 28 inches
Coho minimum size limit: 16 inches

The Council approved the 1981 ocean salmon plan amendment as revised above for submission to the Secretary of Commerce. However, the Salmon Plan Development Team will be meeting during the next few days to update their analysis of the impact of the regulations the Council adopted. The Council meeting was recessed until 10 a.m., March 26, at the Cosmopolitan Motor Hotel in Portland, in case the Council wishes to reconsider the regulations adopted in light of the Team's analysis.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration

National Marine Fisheries Service

P.O. Box 1668

Juneau, Alaska 99802

March 24, 1981

Mr. Clement V. Tillion, Council Chairman
North Pacific Fishery Management Council
P.O. Box 3136 DT
Anchorage, Alaska 99510

Dear Clem:

I am forwarding to you the comments of the National Marine Fisheries Service, Washington, D.C., Office on the proposed Amendment No. 2 to the High Seas Salmon Fishery Management Plan (FMP), Draft Regulatory Analysis, and the Draft Supplemental Environmental Impact Statement which the Council submitted on January 19, 1981.

The comments are divided into critical and substantive issues. Those issues identified as critical affect the approvability of the proposed Amendment, whereas the substantive issues concern suggested improvements to the supporting documentation accompanying the proposed Amendment.

Two issues are identified as being critical to the approvability of the proposed Amendment. These are:

1. The proposed limitation of the fishing gear for hand trollers to a maximum of two lines and gurdies or four sport poles.
2. The proposed requirement that trollers report their catch at an Alaskan port before leaving Alaskan waters by means of a document containing the equivalent information required by an ADF&G fish ticket.

The proposal to limit hand trollers to a maximum of two lines and gurdies or four sport poles raises the issue of possible violation of National Standard No. 4 by discriminating between hand and power trollers, and possible violation of National Standard No. 5 by legislating inefficiency. I don't believe these comments imply that any type of differential gear restriction between hand and power trollers will be disapproved, but only that the arguments submitted in January to justify the gear restrictions are not persuasive in overcoming the issues raised by the National Standards.

The proposal requiring trollers to report their catches in person before leaving Alaskan waters also raises the issue of possible violation of National Standards No. 5 and 7 by legislating inefficiency and by adding to costs rather than minimizing costs where practicable. The issues raised by National Standards No. 5 and No. 7 might be overcome by offering trollers the option of either: (1) filing in-person reports



in an Alaskan port, (2) reporting the equivalent information by radio, or (3) filing a written report within a specified time of selling their catch outside Alaska. Option 3, as you know, has been a requirement for the past two years with very little compliance and would defeat the purpose of obtaining landing information in a timely manner for in-season management. By offering at least the first two alternatives, fishermen could choose between bearing the additional cost of returning to an Alaskan port or reporting by radio. There is a possibility that radio reporting may violate certain confidentiality requirements. Alaska Region General Counsel is exploring that possibility and should be able to advise the Council this week.

The remaining issues are substantive and relate primarily to clarification of the information and rationale contained in the supporting documentation for proposed Amendment No. 2. Alaska Region staff has already made substantial progress addressing issues No. 3 (Reduction in Chinook OY) and No. 4 (Economic Analysis). We will continue working with Council staff to respond to the remaining comments and to prepare the necessary documents to be submitted for Secretarial Review with Amendment No. 2 as approved by the Council this week. In order to remain on schedule to complete the Secretarial Review and promulgate emergency regulations by May 15, 1981, the approved Amendment package must be received in Washington, D.C., by April 6, 1981.

The comments contained here should not be interpreted as comprising an official Secretarial Review. They are meant to be a preliminary review of the proposed amendment to aid the Council in its task of approving a final version. The official Secretarial review will commence when the Council submits its approved version of the amendment.

Sincerely,



Rev Robert W. McVey
Director, Alaska Region

NATIONAL MARINE FISHERIES SERVICE COUNCIL ON THE
DRAFT AMENDMENT NO. 2 TO THE
HIGH SEAS SALMON FISHERY MANAGEMENT PLAN (FMP) AND ON THE
RELATED DRAFT REGULATORY ANALYSIS AND
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

These comments are separated into critical and substantive issues. Critical issues affect the approvability of Amendment No. 2 (amendment) to the FMP and substantive issues identify specific items needing improvement or clarification. Additional rationale should be developed to mitigate the criticality of the hand troll line and reporting requirements issues.

Critical Issues

1. Number of Hand Troll Lines or Sport Poles Allowed in the Fishery Conservation Zone (FCZ).

The amendment would limit hand troll vessels to two lines and gurdies or four sport lines in the FCZ. Alaska state law limits hand troll vessels in territorial waters and inside waters to one line and gurdy or four sport poles. Without additional justification or explanation, this proposal raises the issue of possible violation of National Standard No. 4 by discriminating among fishermen and a violation of National Standard No. 5 by legislating inefficiency.

The concern over gear discrimination is that the proposed restriction discriminates between power trollers and hand trollers. Hand trollers would be allowed two lines anywhere in the management area, however, power trollers are allowed four lines south of Cape Spencer and six lines north of Cape Spencer. Hand trollers are currently restricted to the same number of lines, gurdies, and poles as power trollers. Considering the very small number of hand trollers relative to the number of power trollers operating in the FCZ, the need for more restrictive gear controls on hand trollers should be better explained. If the Council decides to reduce the number of hand troll lines to one line and gurdy or four sport poles to conform to the latest action by the Alaska Board of Fish and Game, the apparent discrimination between hand trollers and power trollers will become acute.

The Council argues that the proposed limit on hand troll lines of two is in parity with the current limits on power trollers. If this were so, the

proposed limits on hand trollers would more logically be two lines south of Cape Spencer and three lines north of Cape Spencer. The proportional gear rationale for this proposed management measure will become even less convincing if the Council adopts the latest State controls on hand trollers. The inconsistency in proposed Federal controls on fishermen in the ECZ versus State controls on Alaska fishermen also creates a problem of enforcement.

A concern over inefficiency also arises from restricting hand troll effort. Inefficiency would be imposed on hand trollers by reducing their catch per unit of effort, i.e., catch per hand troll vessel will decrease as the number of hand troll lines and gurdies are decreased. Inefficiencies will also result from restricting the hand troller's flexibility in fishing practices, i.e., more fuel usage per salmon caught. Beyond a slowing of harvest on mixed stocks, it is unclear what the Council expects to gain by restricting gear usage, and thereby advocating inefficiency, when the harvest is already limited by the equivalent of a numerical quota.

The optimum yield (OY) reduction should more or less come about by shortening the season (particularly the late opening), and closure of the fishery after the quota has been reached. Without additional justification or explanation, we do not have sufficient information to conclude that a restriction on the number of lines, gurdies, or sport poles used by hand trollers is warranted and in compliance with National Standards 4 and 5.

2. Reporting Requirements.

The amendment would require fishermen leaving Alaska waters to submit in person a document indicating the number and weight of salmon on board. This proposal raises the issue of possible violation of National Standard No. 5 by imposing inefficiency, and violation of National Standard No. 7 by adding to costs rather than minimizing costs where practicable. The proposed reporting requirements also should be reexamined in terms of Section 303(a)(5) of the Magnuson Fishery Conservation and Management Act (the Act).

Some boats land their catch outside Alaska prior to the season closing, while other landings occur after the season closes. A problem is that chinook salmon landed outside Alaska are normally not reported until after the end of the season and, it is feared, some landings are not reported at all. The Council feels this data is necessary for inseason adjustments.

An estimated 3-5 percent of the chinook salmon taken last year off Southeastern Alaska were landed outside Alaska. This represents approximately 8-12,000 chinook salmon caught by 20-30 vessels out of the 950 salmon trollers fishing in the ECZ off Alaska. The proportion of the chinook salmon catch landed outside of Alaska, which was taken in the ECZ, is not available. It is suspected that 3-5 percent, as a maximum, is statistically not critical for that fishery. Hence, the need for actual data on these landings rather than estimated data is lessened.

The proposed reporting requirements would impose a burden on non-Alaskan fishermen who would not otherwise enter Alaskan ports (i.e., discrimination) by requiring them to expand time and operating costs (i.e., lower efficiency and higher costs) when reasonable reporting alternatives exist. To facilitate reporting of landings outside Alaska and to avoid national standards problems, we suggest that fishermen be given the option of complying with one of the following requirements: (1) file written reports when they come into Alaska ports; (2) radio report their catch; or (3) file written reports within 48 hours (rather than within the one week period currently allowed) after unloading outside Alaska.

The reporting requirements are subject to the Regulatory Flexibility Act which is concerned with the impact of regulatory and reporting requirements on small entities, such as individual fishing vessels. The Paperwork Reduction Act also applies. Analysis and specific evaluation of burdens and costs (i.e., running time) imposed by the landing requirement is needed under both these laws.

Substantive Issues

1. Rationale for Changes in the FMP's Objectives.

The amendment would revise the FMP's management objectives to reflect the need to reduce chinook salmon harvests in order to increase spawning escapements and rebuild depressed stocks to levels that will produce optimum total sustained harvests. More specific and elaborative justification for changes in the FMP's objectives would improve the documents considerably.

2. Clarification of Escapement Goals.

The derivation of escapement goals identified in the amendment and related documents needs to be clarified. The documents should explain what process was used by the Alaska Department of Fish and Game to set these goals and why the Council has determined that they should be accepted. A clear explanation is needed as to why "the maximum number of spawners observed since the 1950s" was used to establish minimum escapement goals for Southeastern Alaska chinook. Why and how the proposed management measures will maximize escapement and why these proper goals should be explained more clearly. A definition of "escapement" that makes it clear that the amendment is seeking increased escapement to spawning rather than increased escapement to ECZ, inside, and inland fishing would be helpful.

3. Reduction in Chinook OY.

The amendment would reduce the allowable biological catch range and OY range by 15 percent and use the upper limit of the OY range as a harvest ceiling. The best justification with the data presented is for a reduction in OY of 10 percent. The 15 percent reduction should be justified as well as the 10 percent reduction. The specification of the OY reduction is important to

fishermen, managers, and others affected by the FMP, particularly when there is a substantial reduction in catch contemplated. The data is somewhat inconclusive and inadequate in explaining the linkage between the reduction and the anticipated results. Alaska troll fishermen will experience the greatest cost while Columbia River fishermen will experience the greatest benefit over the next 15 years at 15 percent or higher reduction levels according to data presented. A better biological justification for the recommended reduction in OY would make the disparate costs and benefits to the various user groups more palatable. To the maximum extent practicable, the specific impacts from the recommended harvest reduction should be identified and explained. For example, to what extent will a 15 percent harvest reduction impact outside, inside, inland, and spawning stocks off Alaska, Canada, Washington, and Oregon? Conclusions of improved biological productivity levels need to be strengthened by better biological cause and effect analysis. In addition, the overall biological benefits to the nation and at what years those benefits will accrue should be identified for each of the catch reduction percentages considered by the amendment. As written, the amendment and related documents pose problems relative to Section 303 of the Act (i.e., Sections 303(a)(1) and 303(a)(3)).

4. Economic Analysis.

While the economic analysis of the proposed management measures provides a lot of information and is a good start to analyzing impacts of the amendment, it still needs to be expanded considerably. The regulatory analysis (or the Regulatory Impact Review (RIR) under E.O. 12291) needs to identify the economic benefits and costs to each region (e.g., Southeastern Alaska and Columbia River) as well as the benefits and costs to the nation. This should be specified in both a quantitative and temporal manner. Moreover, the RIR must show the impacts of the management measures on each user group, since this is a direct requirement of the Regulatory Flexibility Act. In addition, the RIR does not contain any estimate of enforcement costs (and of alternative enforcement strategies), data collection costs, data collection burdens on the fishermen and processors, as well as the incremental costs of developing this plan. It would be useful to have an estimate of the amount of money spent by the Council, Region, Coast Guard, and State of Alaska, by year, of developing, implementing, and enforcing this amendment.

The Draft Supplemental Environmental Impact Statement (DSEIS) notes that there is "insufficient economic data" to make certain determinations. In this situation, Council on Environmental Quality (CEQ) regulations (Section 1502.22) call for a "worst case analysis" along with some indication of probability or improbability of the occurrence of the worst case. This regulation also requires that the DSEIS weigh the need for actions against the risk of inaction, where the decision is based upon insufficient data.

5. Environmental Impact Statement Summary.

The summary section of the DEIS is missing discussion of some items required by the CEQ. For example, CEQ regulations (Section 1502.12) require the summary to include "areas of controversy (including issues raised by agencies and the public)."

6. Impact on Canadian Stocks and Treaty Negotiations.

Analysis of impacts on Canadian salmon stocks should be amplified. The Canadians should be made aware of the benefits to their salmon runs and fishermen as a good faith effort on the part of the United States toward coastwide salmon conservation management. These benefits should not be without reference to the Canadian interception and bilateral treaty negotiations. It should be pointed out that the proposed amendment conceptually meets the terms of the draft treaty by the United States reducing its interception of Canadian salmon. While the draft regulatory analysis mentions the negotiations problem, this aspect of the amendment needs elaboration. The ultimate benefits to Canada cannot be quantified; however, there clearly are benefits from enhanced treaty negotiations. Unquantifiable benefits accrue as a plus under E.O. 12281.

7. Controls on Treble Hooks.

The documents are inconsistent in PCB versus State controls on treble hooks.*

8. Consistency with Coastal Zone Management Programs.

The Alaska finding of consistency of the amendment with the Alaska Coastal Zone Management Program is included in the amendment. It would be useful to include in the DEIS a description of the State's rationale for the consistency determination. A determination of consistency should be requested of Oregon and Washington for their Coastal Management Programs. The basis for this recommendation is that the amendment will directly affect the salmon stock within the Columbia River.

9. Marine Mammals.

Reference should be made to benefits accruing to marine mammals as predators of salmon.

Attachment

* NOTE: Changes to the DSEIS, suggested by F/CUG on January 23, 1981, have been made. However, additional changes that were suggested should also be made in the amendment and draft regulatory analysis to avoid problems of inconsistency.



Northwest Indian Fisheries Commission

March 20, 1981

Mr. Clement V. Tillion, Chairman
North Pacific Fishery Management Council
P.O. Box 3136 DT
Anchorage, Alaska 99510

Dear Mr. Tillion:

Having reviewed the draft "Supplemental Environmental Impact Statement on Proposed Amendment Number 2 to the Fishery Management Plan for the High Seas Salmon Fishery off the Coast of Alaska, east of 175 degrees east longitude," we offer the following comments. Data previously submitted to the North Pacific Fishery Management Council indicate that the southeast Alaska troll fishery targets primarily on non-Alaskan chinook stocks. Our comments reflect management concerns for Washington chinook stocks harvested in this fishery.

We commend the North Pacific Council for its recognition of the depressed status of west coast chinook stocks, and for its proposed 1981 management recommendations, which would utilize a harvest ceiling. The Council's proposed action to reduce the harvest ceiling and protect Alaskan chinook stocks is an encouraging step in the right direction.

The Fisheries Conservation and Management Act (PL 94-265) requires that the management plans adopted by the U.S. Department of Commerce must meet Indian treaty obligations. The Pacific Fishery Management Council has listed this as a primary management objective of its troll fishery plan. Implementing federal court rulings, the Washington Department of Fisheries and treaty Indian Tribes in Washington State, the primary managers of Washington salmon stocks, have adopted as management objectives the need to meet spawning escapement goals and treaty and non-treaty allocations. The North Pacific Fishery Management Council should recognize the management objectives of the State of Washington and the treaty Tribes for Washington stocks harvested in the Alaskan troll fishery.

Recent run-size projections submitted to the North Pacific Fishery Management Council by the Washington Department of Fisheries indicate that several Washington north coastal spring/summer chinook stocks are in a depressed condition, and at least two stocks are not expected to return to the river in sufficient numbers to meet spawning escapement goals, let alone provide for treaty allocation. Although final pre-season projections are not yet available, preliminary indications are that some Washington coastal fall chinook stocks will also return in numbers insufficient to meet spawning escapement goals or treaty allocations.

Mr. Clement V. Tillion
March 20, 1981
Page two

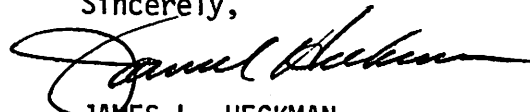
Contribution data for Washington coastal chinook stocks have been estimated by Washington Department of Fisheries for input to the Washington Department of Fisheries/National Bureau of Standards Catch Regulation Analysis Model. The contributions used in the model are estimates of the contributions of these stocks during the 1974-76 base period. They indicate that 23-26 percent of the marine harvest of Washington coastal chinook stocks is taken by the Alaskan troll fishery--the highest interception rate for any U.S. marine fishery. It should also be noted that these are probably minimum estimates for 1981, because the base period of these data is 1974-76, and recent management and effort trends indicate a greater interception rate by Alaskan fisheries.

We recommend that the North Pacific Fishery Management Council adopt a 55 percent reduction in the harvest ceiling for 1981. This is consistent with the Washington Department of Fisheries long-range proposal to return to 1974-76 harvest proportions. Lacking a better and more current data base, a reduction of this level would be a significant move toward achieving spawning escapements and treaty allocations, and would return the Alaskan troll fishery to a previous harvest level. Given the alarming downward trend in most west coast chinook stocks, the North Pacific Fishery Management Council must view any shortcomings of the existing data base as even more reason to recommend more conservative management for 1981.

Meaningful reductions in the harvest of Washington chinook stocks can be realized only through mid-season closures during time periods when non-Alaskan stocks contribute most heavily to the Alaskan troll fishery. Data submitted to the North Pacific Fishery Management Council indicate that June and July are the months of highest interceptions of Washington stocks. Special consideration should also be given to specific area closures, such as the Fairweather grounds, where the harvest is almost exclusively non-Alaskan stocks.

We trust you will seriously consider these recommendations before adopting a harvest ceiling and a regulatory scheme for the 1981 southeast Alaska troll fishery.

Sincerely,



JAMES L. HECKMAN
Executive Director

JLH:cp

cc: All Tribes
Commissioners
Coordinators
Secretary of Commerce
Secretary of Interior
Columbia River Inter-Tribal Fish Commission
Washington Department of Fisheries
Pacific Fishery Management Council
Joyce Wood



Alaska Trollers Association

REPRESENTING ALASKA POWER TROLLERS

205 North Franklin Street
Juneau, Alaska 99801
(907) 586-9400

March 20, 1981

M E M O

TO: Steve Pennoyer

FROM: Earl E. Krygier
ATA Logbook Biologist

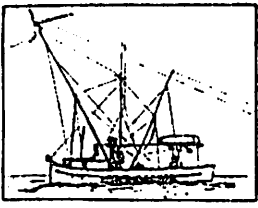
RE: The WDF Model

1. The WDF (Johnson) model was originated as a user allocation model and its present use as a predictor model without "real data" (especially catch/escapement ratios) demands the making of unacceptable assumptions. We feel it is important that the ocean catch to inriver run size ratio must be computed by using actual observed catch from tag recoveries/escapement ratio. Do you know if the updated model is using the Columbia River catch/ocean catch from expanded C.W.T. recoveries? Previously, the model assumed a 67% ocean catch ratio which was allocated to user groups based on Trask River returns. The catch by each group is considered to be the base period from the model. Once the base catch was derived, inriver run size was held constant while ocean effort was increased to calculate a new ocean-inriver run size ratio. I.e.:

In 1976 inriver run is 100,000 and Alaska catch is 75,000. In 1979 inriver run is 100,000 and if Alaska effort tripled, then Alaska catch must be 225,000.

This tenuous assumption assumes that fishing mortality is a linear function of effort and is stock independent, which implies that even if a stock is declining, as long as effort is increased, the catch of a particular substock will increase irrespective of what a particular substock population is.

2. Furthermore the model predicts long-term effects of various Alaska troll chinook catch reductions (in OY) on Columbia River fall chinooks (assuming a stable stock size at the 1980 levels). This basic assumption assumes that the abnormally low survival rates of the downstream migrants due to 1977 drought conditions do not affect stock size or



Alaska
Trollers
Association

Page Two
March 20, 1981

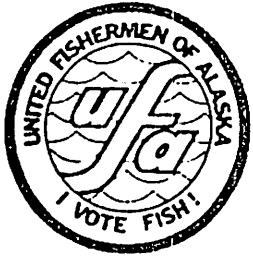
that the effect of the loss of downstream migrants during 1977 has the same effect on stock year to year. We find this an unreasonable assumption.

3. The model predicted that 80% of the upriver brights were harvested by Alaska, leaving 20% for the remaining U.S. harvest. The total catch of these tags by non-Alaskan U.S. fisheries equals 1,124, not including expanded recoveries from the 1979 and 1980 Columbia River net fisheries. This means that Alaskan tag recoveries of these stocks must equal 4,496 in order for Alaska to harvest 80% of the upriver brights. Since Alaska only harvested an estimated total of 1,582 marks by our estimates (we used only reported recoveries for the Columbia in 1979 and 1980 and not estimated marks; the Columbia net catch for those years is substantially underestimated), we have problems understanding where the 80% can come from. Does the updated model predict a more realistic Alaskan harvest of closer to 50% of U.S. harvest?

4. Lastly, we have definite reservations with the required escapement levels the WDF wants to achieve at McNary Dam. They presented the following:

<u>Year</u>	<u>McNary Escapement</u>	<u>Between Dam Loss</u>
1978	27,300	14,100
1979	31,200	11,600
1980	29,000	30,500

Though we understand there is some dam mortality, and some loss to between dam runs of salmon, which require an adjustment to the needed escapement goals at Bonneville, we question between dam loss in 1980 larger than the McNary escapement. It is our understanding that in some years, especially in years of regulated low inriver catch, a significant percent of "inriver loss," both between Bonneville and McNary Dams and below Bonneville, could be due to poaching. A single example of the extent of poaching in the Columbia River is exemplified by the prosecution of an Indian woman in 1978 who poached 13,000 sockeye, steelhead and spring and summer chinook. Yet it has been suggested that this loss be added to the total "inriver" escapement goal at Bonneville, without any plan to decrease such unacceptable "loss" between dams.



UNITED FISHERMEN OF ALASKA

MAILING ADDRESS & OFFICE
197 SOUTH FRANKLIN ST
JUNEAU, ALASKA 99801
907 586-2820

Rodger Painter
Executive Director

RESOLUTION 81-2
March 11, 1981

WHEREAS the king salmon catch of the Alaska troll fleet has been stable for approximately 15 years; and

WHEREAS we are told that there are resource problems with the "Brite" stocks on the Columbia River; and

WHEREAS in response to this perceived problem the North Pacific Fisheries Marine Council has reduced the optimum yield by 15% and the Board of Fish by 10%; and

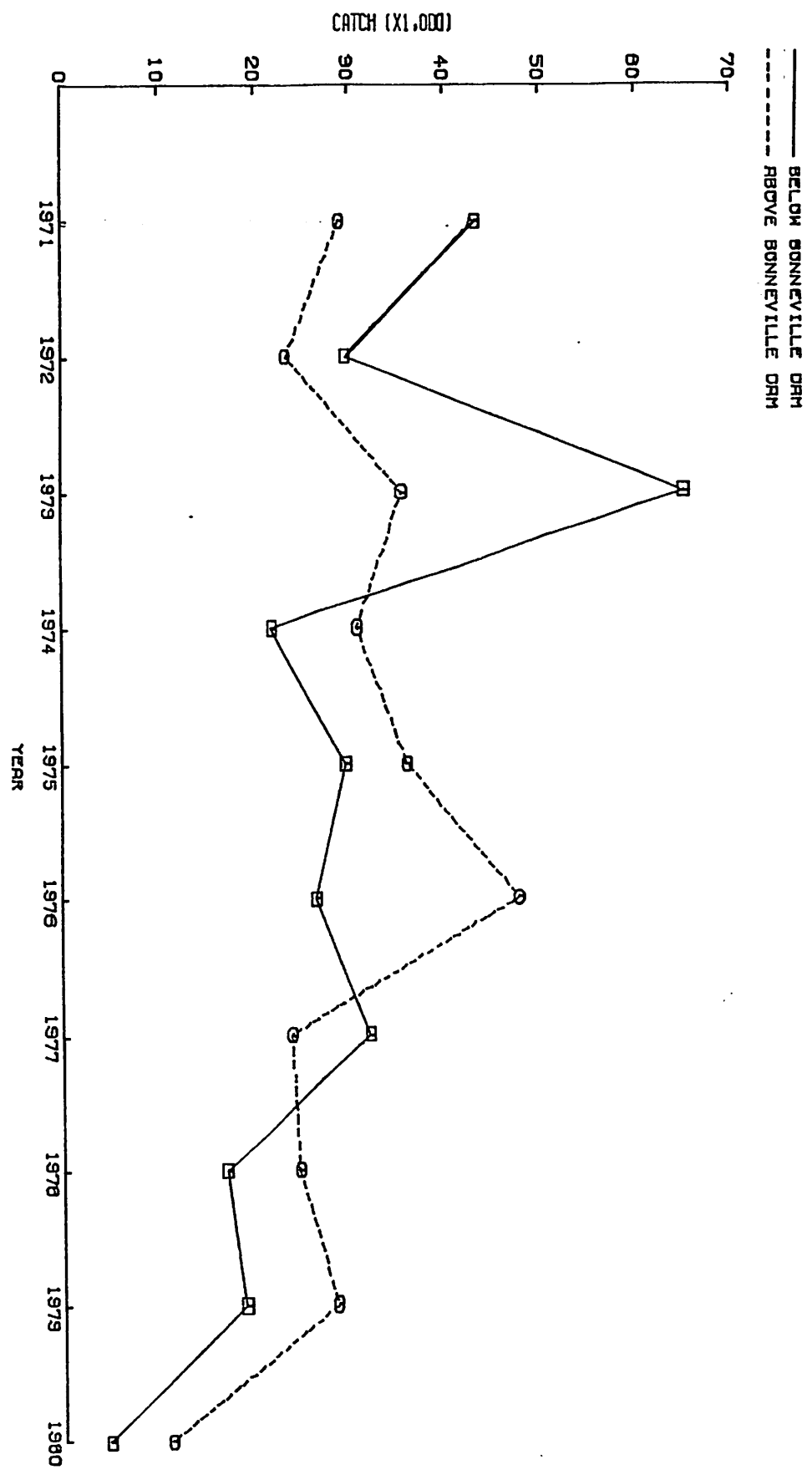
WHEREAS neither the Canadians nor the States of Washington and Oregon have made any provision to assure that these fish will be allowed to return to spawning areas, and in fact, that it appears that Canadian management measures will actually increase the Canadian interception of kings; and

WHEREAS a 15% optimum yield reduction will actually cost power trollers 19% of their incomes, and this reduction will change power trolling from an economically viable industry to one with little chance for financial return over operating costs; and

WHEREAS the costs of this proposed optimum yield reduction would be high to the fishermen and almost no benefit would accrue to the fishermen, and that any salmon avoided by Alaska fishermen will be reallocated to others,

THERE BE IT RESOLVED the United Fishermen of Alaska strongly urges both the Board of Fish and NPFMC to maintain the present optimum yield until it is shown that the proposed sacrifice by Alaskan fishermen will result in commensurate benefits.

COLUMBIA RIVER CATCH OF UPRIVER BRIGHTS 1971 - 1980



3-26-81
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Table . Comparison of estimates of harvest rates, transfer rates, escapements and other fishery characteristics for upper Columbia River Bright chinook salmon from WDF Model Analysis of December 1980 and March 1981.

Note: Data from Trask River chinook stocks used to simulate upper Columbia River bright chinook stocks in the Dec. 1980 analysis has been replaced by 1975 brood year Columbia bright data in the March 1981 analysis.

(1) Estimated catch and escapement of 1975 brood year upper Columbia River brights by area.

Fishery/Area	December 1980 Analysis		March 1981 Analysis	
	Number	Percent	Number	Percent
Alaska Catch	109,930	31	106,331	30
British Columbia Catch ^{1/}	161,043	45	108,499	31
Wash-Ore Coastal Catch	9,909	3	12,538	4
Columbia River Return	76,967	21	126,013	35
Escapement ^{2/}	-	-	60,364	17
In-River Harvest	-	-	65,649	18
Total Return	357,899	100	353,381	100

^{1/} 1980 tag recovery data for B. C. Fisheries is not yet available.

^{2/} Includes missing or unaccounted fish.

(2) Estimated transfer rates of upriver brights (mature and immature) through Alaskan and British Columbia fisheries to southern U.S. ocean fisheries and the Columbia River.

Period Closure of S.E. Alaska Troll Fishery	December 1980 Analysis	March 1981 Analysis
April	24%	40%
May	30%	49%
June	42%	60%
July	-	71%
August	-	50%
September	16%	30%
All Months	52%	63%

(3) Predicted 1981 in-river return of upper Columbia River brights.

	December 1980 Analysis	March 1981 Analysis
Total In-river Run	76,700	69,400
Escapement ^{1/} Goal	58,700	58,700
Harvestable Surplus	18,000	10,700

^{1/} Includes an estimated 18,700 missing or unaccounted fish and 40,000 spawning fish goal.

(4) Estimated percent reduction of Alaska troll harvest from 1980 OY of 320,000 to achieve conservation and hatchery surplus harvest goals for Columbia River chinook in 1981.

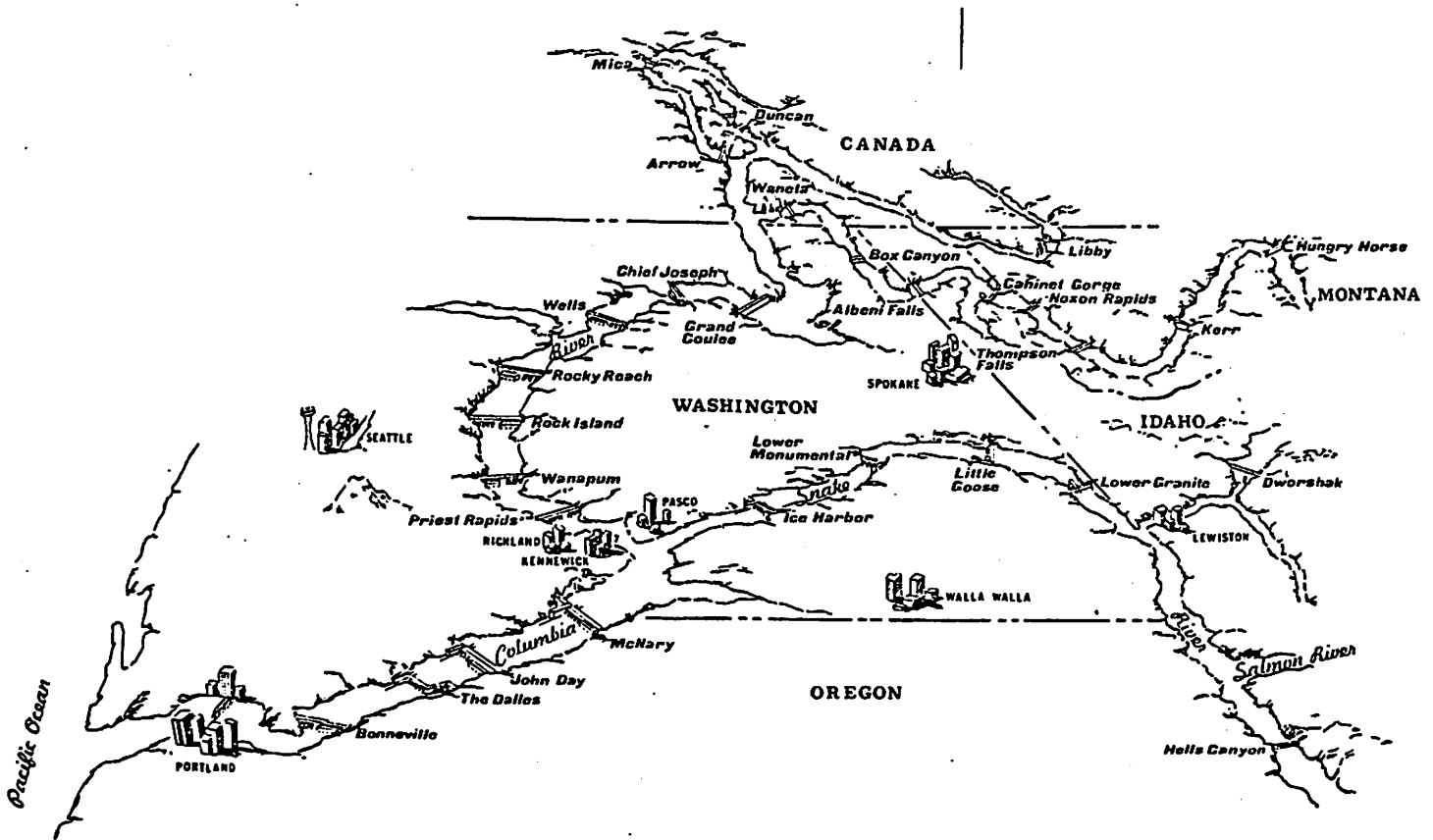
December 1980 Analysis	March 1981 Analysis
24%	29%

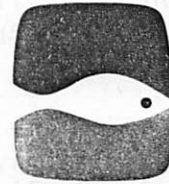
(5) Estimated U.S. fisheries harvest share proportions for upper Columbia River brights.

Long-Term Effect Under Stable Conditions Existent In	Percent of U.S. Harvestable Surplus			
	December 1980 Analysis		March 1981 Analysis	
	Alaska	Wash-Ore	Alaska	Wash-Ore
1974-1976	51%	49%	41%	59%
Projected 1981	80%	20%	77%	23%
Reduction in Alaska catch to return to 1974-76 sharing		48%		55%

Figure 4.

Except for a 50-mile reach of free-flowing river below Priest Rapids Dam — for which a dam has long been proposed — the Columbia River is a series of back-to-back reservoirs from Bonneville Dam to the U.S.-Canadian border. Anadromous fish are blocked at Chief Joseph Dam on the main-stem Columbia and at Hells Canyon Dam on the main-stem Snake River. Grand Coulee Dam alone shut off more than 1,000 linear miles of main-stem and tributary salmon and steelhead habitat. Army Corps of Engineers





March 23, 1981

COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

8383 N.E. Sandy Blvd.
Suite 320
Portland, Oregon 97220
Telephone (503)
257-0181

Mr. Clement V. Tillion, Chairman
North Pacific Fishery Management Council
P.O. Box 3136DT
Anchorage, Alaska 99510

Dear Mr. Tilliam:

This letter is to convey our comments and recommendations regarding the preferred options for the 1981 Southeast Alaska troll salmon fishery indicated by the Council at its January meeting.

The Alaska troll fishery differs from most other ocean salmon fisheries in its heavy reliance on non-local stocks. Data collected in the early 1950s by Parker and Kirkness found local Alaska stocks to be a minor component of the fishery while more recent work by Kissner, using scale analysis, indicates that non-local stocks continue to maintain the Alaska fishery.

This heavy reliance on non-local stocks imposes unique management restraints on the Alaska fishery. While more southerly fisheries can achieve a sustained yield by meeting local escapement requirements, a sustained fishery off Alaska can only occur by achieving management goals which are largely set by non-local management entities. Thus, proper management of the Alaskan fishery requires an unusually farsighted management philosophy.

In formulating their 1981 regulations, the Council has recognized the need to conserve all stocks contributing to the southeast Alaska fishery. While the measures proposed by the Council fall far short of what is required to begin rebuilding Columbia River chinook stocks, we recognize the difficulty of the initial decision regarding a cut, and trust that more meaningful measures will appear in the final regulations. We support the Council's efforts to regulate the fishery by direct methods such as through the reduction in OY rather than relying solely on less effective time/area closures.

We are also encouraged by the Council's adoption of new management objectives. These objectives recognize the need to 1) manage the fishery to obtain optimum sustained yield from all wild stocks contributing to the fishery, 2) reverse the trend of increasing catch and effort in offshore waters, 3) manage wild and hatchery stocks separately, and 4) develop a coastwide management plan.

Unfortunately, the Council's preferred options for 1981 are inadequate to achieve any meaningful benefit to non-local stocks, and only attempt to

address a painfully slow rebuilding of Southeast Alaska stocks. Little consideration is given for the mixture of stocks contributing to the fishery, almost all of which are chronically underescaped.

The lack of action to address the needs of non-local stocks can be seen by calculating the increase in escapement of upper Columbia River bright chinook that could be expected under the preferred options. Columbia River brights are one of the major stocks contributing to the Alaska fishery and have shown a steady decline in abundance for the last seven years. The following calculation illustrates the expected increase in river mouth escapement of upriver brights should there be a 15% reduction in OY and a May 15-September 20 season:

1. Total reduction in OY = 48,000
2. Number of mature upriver brights potentially saved without regard to season changes = $3,775\frac{1}{2}$
3. Portion of harvest of upriver brights occurring prior to May 15 and after September 20 = $4.8\%\frac{1}{2}$
4. Savings of upriver brights corrected for proposed season = 181
5. Transfer to Columbia River assuming 80% survival = 145

If a 10% reduction in OY is made, as favored by the Alaska Board, the savings would be only 96 fish.

This example illustrates two fundamental problems with the changes proposed by the Council:

- 1) The benefits of the proposed changes to Columbia River chinook, one of the major stocks contributing to the fishery, would be practically non-existent. Similar results would likely occur to many other non-local stocks.
- 2) In the example, the benefits of the 15% reduction in OY declined 95% when the adjustment for the proposed season change was made (cf. lines 2 and 4 above). The proposed season change restricts fishing during the time when Columbia River stocks are least abundant and concentrates fishing on the period when Columbia River stocks are most abundant.

Previous comments submitted by the CRITFC and the Washington Department of Fisheries emphasized the need for overall reductions in OY, rather than selective reductions designed only to protect local stocks. In fact, it seems apparent that the proposed action would increase effort on Columbia River stocks. Therefore, any reduction in OY must include season restrictions designed to benefit non-local as well Southeast Alaska stocks. WDF has found

$\frac{1}{2}$ WDF model data.

that a closure during June would have maximum benefit to Columbia River stocks due the high transfer rate through the British Columbia fishery during this period, and their high abundance in the fishery. We strongly urge the Council to impose significant reductions during this period.

The calculation of the actual reduction in OY required obviously depends on goals to be achieved. In comments dated March 12, 1981, as well as previous comments, the Washington Department of Fisheries calculated a reduction designed to achieve two objectives:

- 1) Meet spawning escapement requirements for upper Columbia River bright chinook.
- 2) Return sufficient harvestable bright chinook to the Columbia River to allow full utilization of Bonneville Pool hatchery stocks.

The CRITFC supports these two objectives for 1981 Management, and adds a third:

- 3) Return sufficient brights to the Columbia River to allow make-up of the 20,300 fish deficit owed treaty fishermen under the 5-Year Plan which expires in 1981. Due to the mixed stock fishing situation on the Columbia River, this deficit must be made up in both tules and brights.

To achieve the first two objectives, WDF calculates a need for a savings of 7,375 upriver bright chinook from the Alaska fishery, based on updated run size estimation. Assuming the 20,300 fish deficit would have to be in the same 3:1 tule-bright ratio used by WDF, 5,075 upriver brights would be required at the Columbia River mouth to allow make-up of the deficit. Using 80% transfer rate through the Canadian fishery, 6,344 brights ($5,075/0.80$) would need to be saved from the Alaska fishery in addition to the 7,375 fish required to achieve objectives 1 and 2. Using WDF's revised model input date, which calculates a catch of mature upriver brights by the Alaska fishery of 25,167, the required reduction is $(13,718/25,167) 100 = 54.5\%$. Again it should be realized that this reduction must be across the entire season.

While this reduction may initially appear drastic, it must be put into the context of what is happening to other fisheries and to the resource. Of all fisheries which harvest significant numbers of upper Columbia bright chinook, Alaska is the only one which has not declined significantly in recent years. Relative to the 1971-80 average, Columbia River treaty catch of chinook declined in 1980 by 57.2%, Columbia River non-treaty catch by 30.9%, Washington troll and sport catch by 54.2%, and British Columbia troll catch by 12.6%. In contrast, the Alaska chinook catch in 1980 was within 1% of the 1971-80 average catch. Even more alarming is the fact that the high sustained harvest of the Alaska fishery has been made while catch/effort has declined. In 1980, the total catch/landing for the Alaska troll fleet declined 38% relative to the 1971-75 average. This decline in the face of relatively stable harvest means that the fleet is fishing harder on a declining resource, and that a greater portion of the total run size is being taken by the ocean fishery.

Mr. Clement V. Tillion, Chairman
North Pacific Fishery Management Council
Page four

This is also shown by the fact that the Alaska catch has remained constant while the spawning escapement of practically all stocks contributing to the fishery has declined. In their March 12, 1981, comments, WDF compares the river mouth escapements with spawning escapements requirements for 28 stocks which contribute significantly to the Southeast Alaska fishery. Of the 28, only six achieved their spawning escapement requirements, and the average river mouth escapement was only 63.6% of that required. It should furthermore be noted that the WDF data actually paints an unrealistically optimistic picture of the situation since the river escapements do not include inriver harvest. Since river harvest does occur in many of the systems to avoid excessive hatchery escapements of other stocks and species, and to partially meet inside fishery allocations, actual spawning escapements are less than river mouth escapements.

In summary, the CRITFC feels that the Council is to be commended for its initial recognition of some of the problems facing the resource upon which the Southeast Alaska troll fishery is built. However, due to the depressed nature of this resource it is evident that the actions contemplated to date are inadequate. To meet the conservation needs of the resource and to meet the legal obligations of the United States, we feel the Council should take the following action:

- 1) Reduce OY by 54%. This action would place the upper OY limit at 147,200 chinook and deliver sufficient upper Columbia River bright chinook to the river mouth to achieve the objectives outlined above.
- 2) Couple any reduction in OY with season restriction designed to benefit non-local as well as Southeast Alaska chinook stocks. We suggest careful consideration of WDF's proposal for a June closure.

Sincerely,

COLUMBIA RIVER INTER-TRIBAL
FISH COMMISSION

N. Kathryn Brigham

N. Kathryn Brigham
Secretary

WEM:dj

TESTIMONY TO THE NORTH PACIFIC COUNCIL
AND ALASKA BOARD OF FISHERIES

by

Eric Jordan
P.O. Box 1136
Sitka, Alaska 99835

Distinguished members of the Board of Fisheries, North Pacific Fishery Management Council and support staff. Thank you for the opportunity to testify before both of you about the proposed Salmon Fishery Management Plan.

I am happy to see the Board and Council prepared to adopt regulations for the troll fishery which will meet their responsibilities to conserve the resource. I hope my comments on and suggested alternatives to your proposals will help conserve the resource.

I. Objectives

I believe the proposed objectives of the Salmon Fishery Management Plan are well written and should be adopted.

II. Optimum Yield

I, and many trollers I have listened to, recognize that there are problems with many chinook stocks and can support regulations which will put more of the jeopardized stocks on the spawning grounds. However, we

feel a quota may not meet these objectives because the stocks protected during a closure after the quota is reached may not be, and indeed the evidence indicates will not be, the stocks most needing protection.

At the same time, the late season chinooks (August and September) are most often much more valuable because, as the study by Eric McDowell shows, these fish are bigger, redder, and the price is higher.

Furthermore, setting a quota does not provide incentive for or reward Alaskans for their effort at enhancement of chinooks. For example, a substantial number of 9-12 pound Crystal Lake chinooks were harvested last year. Many trollers are dismayed to find that under the Optimum Yield Quota system the addition of these fish, a substantial number of which are white, means we can catch less 20-30 pound late season fish!

I offer a different approach.

III. Season

To protect Alaskan stocks and provide some benefit to other stocks, I support a May 15 opening.

1. Other closures to protect specific stocks should be made during the season based on staff assessment of catch data, run strength, shaker problems and other stock status. If additional closures are needed beyond the 10 day late July closure, I would prefer the closure be,

1st choice - the 10 days between September 10 and 20

2nd choice - the last 10 days of June

I would not like the closure to be in August or the first week of September. There should be no additional closures to keep the catch within a quota just as there should be no special openings to boost the catch up to a quota level.

2. Coho Season

I favor a July 1 - September 10 season to conserve the resource and maximize the value of each fish caught.

3. I favor allowing trollers to harvest a set number of Alaska king and coho west of Cape Suckling that are returning to Alaska as a result of restrictions on Japanese trawl and gillnet fleets.

4. Gear Restrictions

I favor 4 lines for power trollers wherever they fish and 2 hand gurdies or 4 sport poles for hand trollers.

I favor a ban on treble hooks and hope you will eventually permit only single barbless hooks.

Testimony to the Council
North Pacific Board of Fish
& Alaska by Eric Madson
P.O. Box 1136
Sitka AK 99835

Page 1

Distinguished members of the Board of Fish, North Pacific Fisheries Management Council and support staff. Thank you for the opportunity to testify before both of you about the proposed Salmon Fishery management Plan.

I am happy to see the board and council prepared to adopt regulations for the troll fishery which will meet their responsibilities to conserve the resource. ~~my comments are not in opposition to conservation methods~~ I hope my ~~comments~~ comments on, and suggested alternatives to your proposals will help conserve the resource.

Highly confidential
and not to be
discussed with
anyone outside
the office

The following information was received from
the source on [redacted] [redacted] [redacted]
[redacted] [redacted] [redacted] [redacted] [redacted]

The source has advised that [redacted] [redacted] [redacted]
[redacted] [redacted] [redacted] [redacted] [redacted]
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The source has also advised that [redacted] [redacted] [redacted]
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The source has further advised that [redacted] [redacted] [redacted]
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CONFIDENTIAL

I Objectives

I believe the proposed objectives of the Balmon Fishery management plan are well written and should be adopted.

II Optimum Yield

I, and many trappers I have listened to, recognize that there are problems with many chinook stocks and can support regulations which will put more of the jeopardized stocks on the spawning grounds. However we feel a quota may not meet these objectives because the stocks protected during a closure

Handwritten text on the right margin, possibly a page number or reference.

Handwritten text at the top right of the page.

I have the pleasure to acknowledge the receipt of your letter of the 10th inst.

in relation to the above mentioned matter.

I am sorry to hear that you are unable to attend the meeting.

I am sure you will be able to attend the next meeting.

I am, Sir, very respectfully,
Your obedient servant,

J. H. [Name]

Secretary

[Address]

[Address]

[Address]

[Address]

[Address]

[Address]

[Address]

[Address]

[Address]

after the quota is reached may not be and indeed the evidence indicates will not be the stocks most needing protection.

At the same time, the late season chinooks (August & Sept) are most often much more valuable because, as the study by Eric Mc Dowell shows, these fish are bigger, redder, and the price is higher.

Furthermore, setting a quota does not provide incentive for or reward Alaskans for their efforts at enhancement of chinooks.

For Example:

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Main body of handwritten text on lined paper, appearing to be a list or series of notes. The text is very faint and difficult to decipher, but seems to contain several lines of entries.

A substantial number of 9-12 pound crystal lake chinooks were harvested last year. Many trawlers are dismayed to find that under the optimum yield quota system the addition of these fish, a substantial number of which are white, means we can catch less 20-30 pound late season fish!

I offer a different approach.

II Season

To protect Alaskan stocks and provide some benefit to other stocks I support a MAY 15 opening.

Handwritten text on lined paper, appearing to be a list or notes. The text is extremely faint and mostly illegible. Some words like "number" and "list" are barely discernible.

Vertical text on the right margin, possibly a page number or a reference code, written in a stylized font. It appears to be "1001" or similar.

2. Other closures to protect specific stocks should be ~~made~~ made during the season based on staff assessment of catch data, sea strength, shaker problems and other stock status.

If additional closures are needed beyond the 10 day late July closure

I would prefer the closure be

1st choice

1. The 10 days between Sept 10 & 20

2nd choice

2. The last 10 days of June

I would not like the closure to be in August or the 1st week of September.

There should be no additional closures to keep the catch within a quota, just as there should be no special openings to boost the catch up to a quota level.

3

I. Other changes to protect
 specific stocks should be
 made during the season
 based on staff assessment
 of water base, run strength, stream
 problems and other stock
 of additional changes are needed
 beyond the 10 day late July change
 I would prefer the change be
 1. The 10 days between Sept 10-20
 2. The last 10 days of June
 I would not like the change to
 be in August or the 1st week of September.
 There should be no additional changes
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5. Gear Restrictions

I favor 4 lines for power trollers wherever they fish and 2 hand gages or 4 sport poles for hand trollers.

I favor a ban on treble hooks & hope you will eventually permit only single barbed hooks

Thanks ~~_____~~

1. The first part of the paper is devoted to a general introduction of the subject.

The second part is devoted to a detailed study of the various aspects of the problem.

The third part is devoted to a study of the various aspects of the problem.

The fourth part is devoted to a study of the various aspects of the problem.

The fifth part is devoted to a study of the various aspects of the problem.

The sixth part is devoted to a study of the various aspects of the problem.

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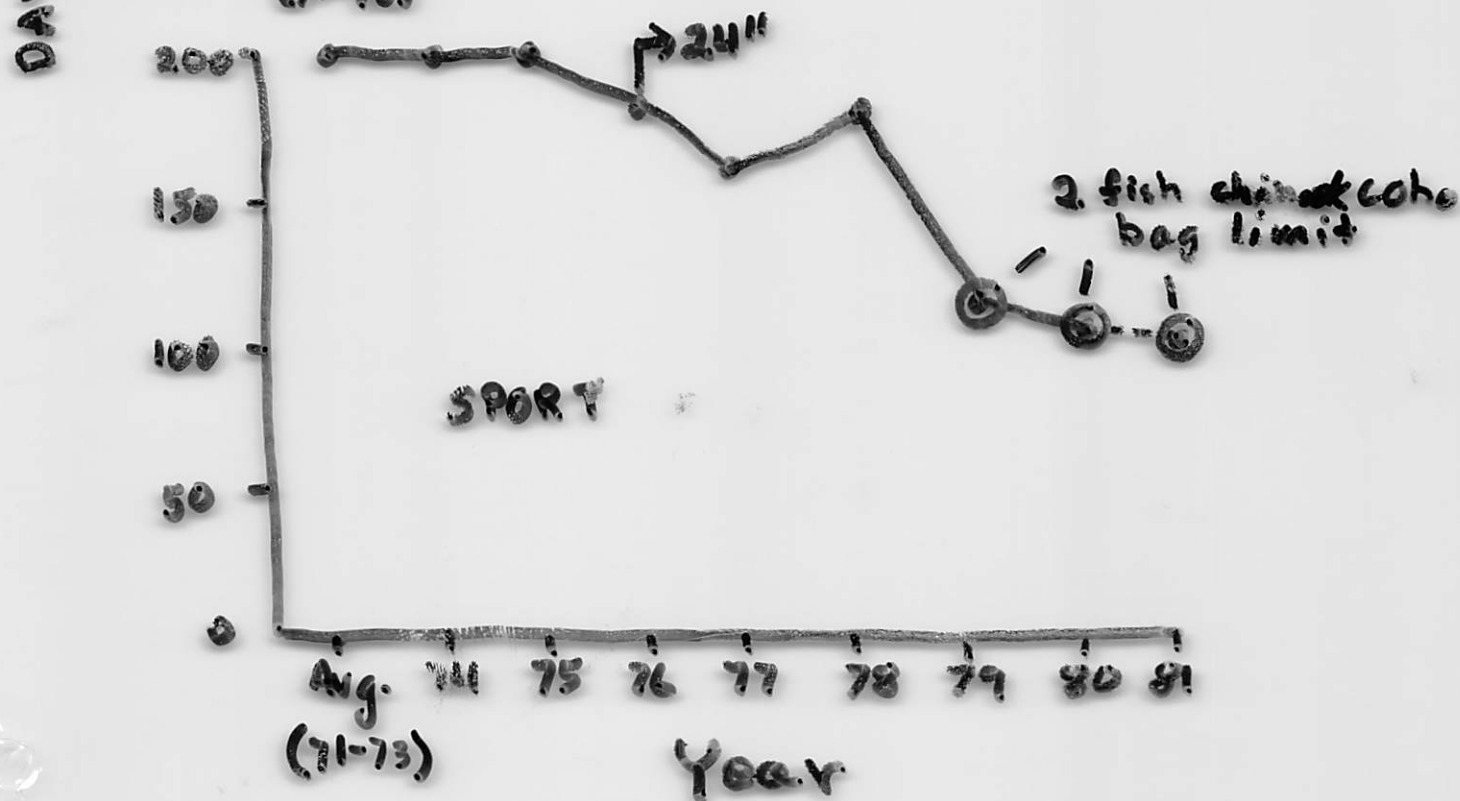
The twelfth part is devoted to a study of the various aspects of the problem.

The thirteenth part is devoted to a study of the various aspects of the problem.

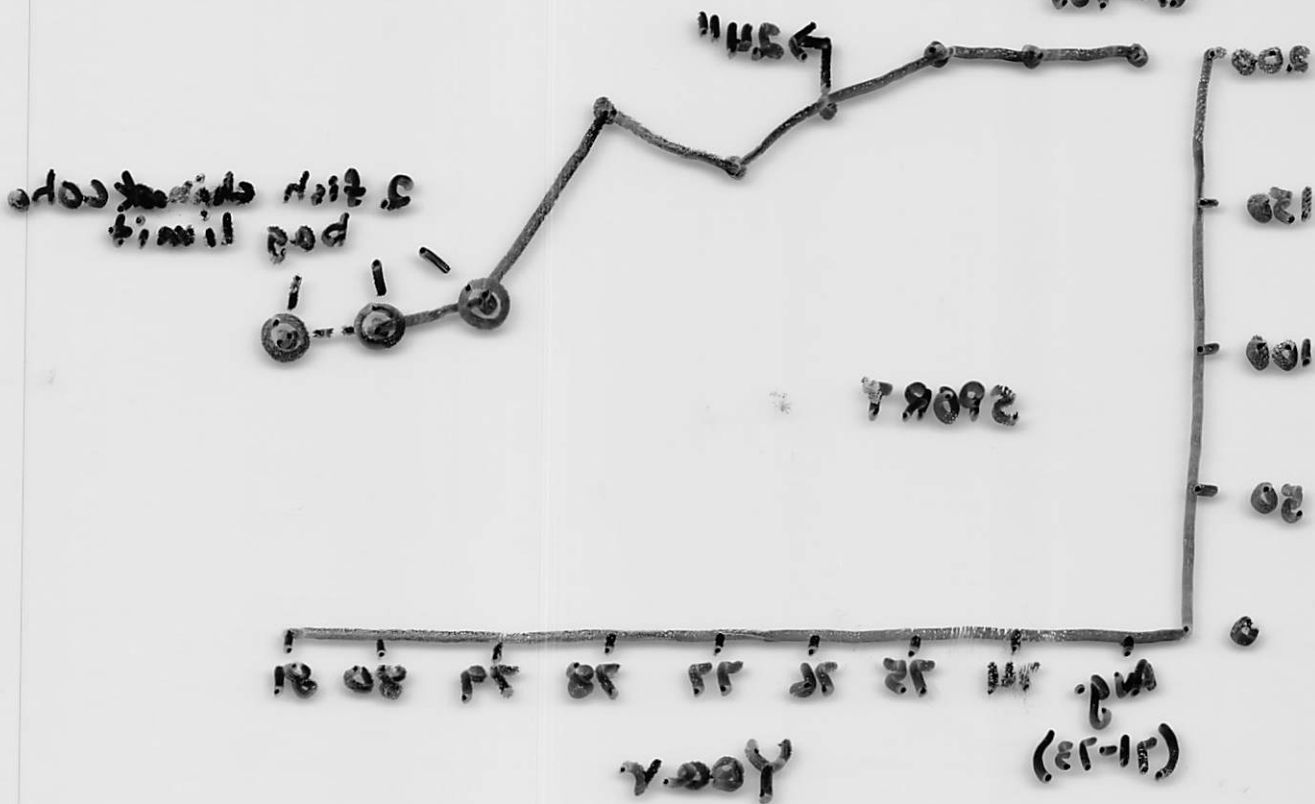
The fourteenth part is devoted to a study of the various aspects of the problem.

The fifteenth part is devoted to a study of the various aspects of the problem.

Coastal
 Allowed Fishing Time N. of Cape Falcon



Allowed Fishing Time N. of Cape Falcon
 Coastal



Days Open

COMPARISON OF NUMBER OF DAYS FISHED IN THE COLUMBIA RIVER



COMPARISON OF NUMBER OF DAYS FISHED IN THE CORNBERG RIVER

Bopt Decision

Engine

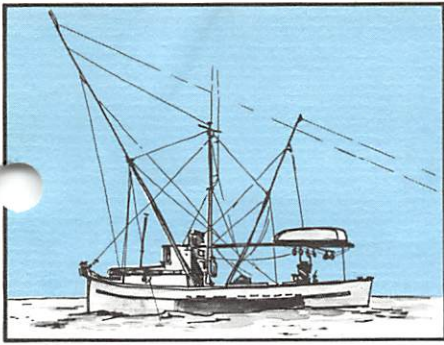
Non-Engine

Year



Total days

20 21



Alaska Trollers Association

REPRESENTING ALASKA POWER TROLLERS

205 North Franklin Street
Juneau, Alaska 99801
(907) 586-9400

March 25, 1981

STATEMENT OF LEWIS SCHNAPER

Members of the Council & Board:

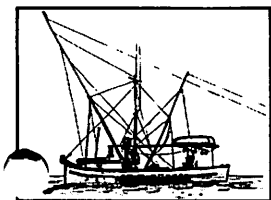
I'm Lewis Schnaper, representing the Alaska Trollers Association and the Halibut Producers Cooperative.

We would like to request that both the Council and the Board reconsider their decisions, and make the OY for king salmon for 1981 the same as last year: 320,000 fish.

There is little doubt that every king salmon stock on the west coast is below optimum, and there are certain stocks that are in serious trouble. There is, however, considerable doubt both about the exact nature and size of the problem and what solutions might work without destroying the fisheries dependent on these stocks.

The Alaska troll fleet has stated before, and has demonstrated, that we are committed to the health of this resource. We will make whatever sacrifice is necessary to rebuild the stocks upon which we fish--but we cannot stand by and see fish taken from us in the name of conservation and reallocated to fishermen in Canada and Washington.

The State of Alaska has addressed some of the most urgent problems with out own king salmon stocks with the early season closure. We support this management measure,



Alaska
Trollers
Association

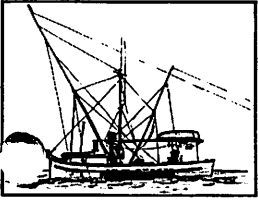
3/25/81, page two

especially as arrangements have been made to get these fish through all fisheries and into their streams.

On the other hand, we are now dealing with a request by WDF and the Indians to reduce our catch by either 29% or 55%, and the reason given is that the upriver Columbia stocks are in trouble. That the Brite Stock is not healthy is beyond question, but that any sacrifice by Alaska trollers can affect the health of this run is open to serious doubt.

The paper presented by WDF asks Alaska fishermen to avoid 93,000 kings to put 6,000 fish into the Columbia River--and then goes on to say that these fish will not add to necessary escapement, but will be used to allow the harvest of a hatchery surplus. This paper does not take changes in Canadian interception patterns into account, nor does it address the fact that poaching in the Columbia accounts for up to 30,000 lost fish--six times more fish that Alaska is paying 93,000 fish to produce in the right place.

I'm convinced that the new Canadian troll regulations are going to actually increase the Canadian catch of kings this coming year. They've taken their big boats off of reds and pinks by reducing them to six lines, and every Alaska troller I've talked to seems certain that faced with the same situation that they'd shift their efforts to king salmon. If the day comes when the Alaska OY is reached and we must stop fishing, you can expect to see a huge fleet of Canadian trollers in northern outside waters.



Alaska
Trollers
Association

3/25/81. page three

Should any of our fish get through the Canadian fleet, they then will be in the waters controlled by the PFMC. I've just returned from the PFMC meeting, and despite our request, that Council made no provision for fish which we release on their behalf to come through their fisheries and into the stream.

All this suggests that the benefits of this management measure will accrue to other fishermen, not to the breeding stock on which we depend. Lets look at the other side of the coin and see what these measures will cost the Alaska fishermen.

Our economists have calculated the effects on our fleet on a 15% OY reduction--you have the paper from Hohman-McDowell before you. They found that this management measure would cost the average troller 19.5% of his income--and that this would, in effect, deprive him of his "take home pay" for his investment, hard work, and risks.

I suggest that the benefits of a 15% OY reduction do not begin to match these costs, and ask you to reconsider your decision. It's significant to note that in the two months since you decided to reduce the OY that neither the Canadians nor the PFMC have made any move to either accomodate these extra fish into their escapement, or to re-arrange their fisheries to pass extra fish through--and I'm not convinced that this is much of a demonstration of good faith.