

Washington Trollers Association
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Doug Fricke, President

Washington Trollers Association

September 5, 2000

Pacific Fishery Management Council
2130 SW Fifth Avenue, Suite 224
Portland OR 97201

Re: Proposal to Change the 2001 Pacific Halibut Catch Sharing Plan for Area 2A.

Dear Chairman Lone and Council Members:

As the Pacific Halibut Catch Sharing Plan for Area 2A is now written, a commercial salmon troller who is licensed for halibut catch may retain halibut only during the period of May 1 through June 30, and after July 31 if quota remains unharvested. In recent years both Oregon and Washington have conducted chinook directed fisheries outside this time frame. Washington in 1999 had a successful Chinook directed Plug Fishery starting in July. Halibut caught during July cannot be retained even if there is sufficient quota remaining in both the overall commercial quota and the 15% troll allocation.

The 15% troll allocation is a reflection of the historic harvest of halibut by salmon trollers during the years 1960 through 1983. After about 1983, trollers' access to halibut was severely restricted by fleet reductions and cutbacks in salmon seasons. The derby style halibut opening, where fishing was often open for only a period of hours, was completely incompatible with the trollers slower fishing technique, taking salmon and halibut simultaneously. To substantiate this we have included a chart of troll halibut landings from 1960 through 1991. For these reasons we feel we should have more liberty in the time frame to harvest our 15% allocation. Historically, trollers harvested halibut whenever the salmon season was open.

We propose the Catch Sharing Plan be changed to allow the retention of halibut during all salmon troll openings after May 1, provided the openings have a chinook landing allowance. Halibut retention during these openings would be allowed to continue until the halibut troll allocation is reached. Trollers have addressed conservation of the halibut resource through landing limits and a ratio fishery. We intend to continue similar limits and ratios in the future. There have not been overages in our fishery. We feel our request to retain halibut during this additional time frame is well within the intent of the allocation. This extended harvest opportunity will provide additional benefits to local coastal communities by allowing fresh local caught halibut to be marketed for a longer part of the year.

*Quality Troll Caught
Salmon for Consumers*



Halibut caught in the troll fishery are landed at a slow rate. Even with this change there is little danger of exceeding the quota. The ratio of chinook per halibut and landing limits is sufficient control. Retention of halibut in the troll fishery would be stopped when the 15% troll allocation is reached.

We have never felt that the roll over to the long line fishery was appropriate because the troll allocation was historically taken over the entire troll season from May through September; therefore we are proposing there not be a roll over unless it is obvious that the troll harvest cannot be reached in the season set for that particular year.

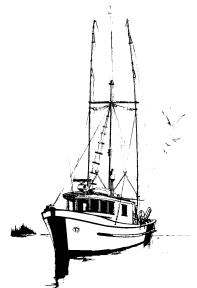
In addition, the trollers request that the word non-directed be used in place of incidental to describe our catch of halibut during the troll season. There is a negative connotation to the word *incidental* indicating accidental or by-catch rather than non-directed which allows us to catch but not to target.

Please review the Catch Sharing Plan and consider the changes that would reflect the above requests. Thank you for this consideration.

Sincerely,

Douglas H. Fricke

Douglas H. Fricke, President
Washington Trollers Association



**COMPARISON of WEST COAST LONGLINE and TROLL
COMMERCIAL HALIBUT LANDINGS
AREA 2A or STATISTICAL AREA 00-05PRE-1981 (from IPHC Data)**

YEAR ↓	TOTAL US CATCH (1000's lbs)	TOTAL US TROLL CATCH (1000's lbs)	US TROLL LANDINGS as a percent of total landings	AVERAGES ↓
1960	885	232	26.2%	<i>Note during the years 1960 through 1983 the percent of total landings average is set at 15%</i>
1961	497	67	13.5%	
1962	449	33	7.3%	
1963	412	21	5.1%	
1964	280	15	5.3%	
1965	214	26	12.1%	
1966	183	26	14.2%	
1967	199	15	7.5%	
1968	138	12	8.7%	
1969	170	76	44.7%	
1970	158	9	5.7%	
1971	295	72	24.4%	
1972	333	127	38.1%	
1973	216	34	15.7%	
1974	514	42	8.1%	
1975	460	45	9.8%	
1976	233	33	14.2%	
1977	200	25	12.5%	
1978	94	14	15.0%	
1979	97	7	7.2%	
1980	22	6	27.2%	
1981	202	35	17.3%	
1982	211	23	11.0%	
1983	265	20	7.5%	
1984	431	5	1.1%	<i>Note this shaded area (years '84 thru '91) results in a 1% troll landing average</i>
1985	493	11	2.2%	
1986	17 Ind* 564 N.I.**	10	1.8%	
1987	44 Ind 548 N.I.	4	0.7%	
1988	94 Ind 392 N.I.	1	0.3%	
1989	142 Ind 330 N.I.	<1	0.3%	
1990	122 Ind 203 N.I.	2	0.3%	
1991	120 Ind 226 N.I.	N/A	1.0%	

* Ind = Treaty Indian

**N.I = Non Treaty