

Don McIsaac, Executive Director
PFMC
2130 SW Fifth Ave., Suite 224
Portland, OR 97201

4 - 02 - 01

Washington Trollers Association
PO Box 7431
Bellevue, WA 98008

Subject: Salmon Troll Incidental Catch of Yellowtail Rockfish

Dear Director McIsaac,

As the Washington Trollers mentioned in the "Strategic Groundfish Plan" letter dated 1-05-01, the "open access" category that we have been managed under has never been appropriate for the salmon troll incidental groundfish catch. We don't think salmon troll incidental groundfish catch is mentioned anywhere in the SAFE documents. Prior to 1999, the groundfish landing allowances were large enough that the salmon troll incidental catch never approached the maximum landing allowances. However, in 1999 and 2000, we found that some of the "open access" landing allowances did in fact force us to return a few of the managed species back to the ocean.

While salmon trolling, we encounter very few of the species noted in the SAFE document. Yellowtail rockfish is the specie that we most encounter and there was a landing limit of 100 pounds per month for the salmon troll incidental harvest under the "open access" management. We would like to set up a yellowtail salmon troll landing management regime in 2001 and beyond that prevents discards, avoids targeting on depressed stocks, and allows a fair allocation of the allowed landing allowance.

Through the Staff of Washington Department of Fish and Wildlife (WDFW) we obtained some preliminary information that shows there is little correlation between increased catches of yellowtail and canary which is the most closely associated depressed groundfish stock. The information also shows that in 1998 (1999 and 2000 data is skewed because of restrictive yellowtail landing allowances) which is the last year that yellowtail landing allowances exceeded salmon troll encounters, of the 686 coastwise landings that included both salmon and yellowtail, no landings exceeded 1000 pounds and only 41 landings exceeded 200 pounds of yellowtail while delivering salmon. The remaining 645 landings delivered less than 200 pounds of yellowtail with their salmon. A person needs to remember that the monthly landing allowance of yellowtail in 1998 was far in excess of the yellowtail landed with the troll salmon landings. The total troll landings of yellowtail with salmon in 1997 and 1998 were 31.16 mts and 18.77 mts respectively compared to the ABC of 3000 to 4000 mts.

However, with no tie to salmon, there may be an incentive to target yellowtail which we want to avoid. Also, to be fair, there needs to be a small landing allowance with no salmon for the days when a salmon troller fishes and encounters some yellowtail but is unsuccessful in catching a salmon. Another difficulty we have is estimating weights at

sea. Rather than basing the regulations on weight, it would be better for enforcement and fishermen if the regulation is based on the number of fish allowed to be retained.

We are proposing coast wide regulations that will prevent discards by the salmon trollers, prevent targeting when not salmon trolling, and allows a fair allocation of the allowed landings. For the 2001 season, we request that a salmon troll license holder is allowed to deliver up to 20 yellowtail rockfish plus five yellowtail rock fish per salmon delivered whenever there is a legal salmon opening. The data indicates that salmon troll yellowtail encounters would not require Trollers to return yellowtail rockfish to the ocean with these landing allowances. We ask that the State agencies monitor the deliveries during 2001 and review the success of the program at each PFMC meeting through 2001.

Sincerely,

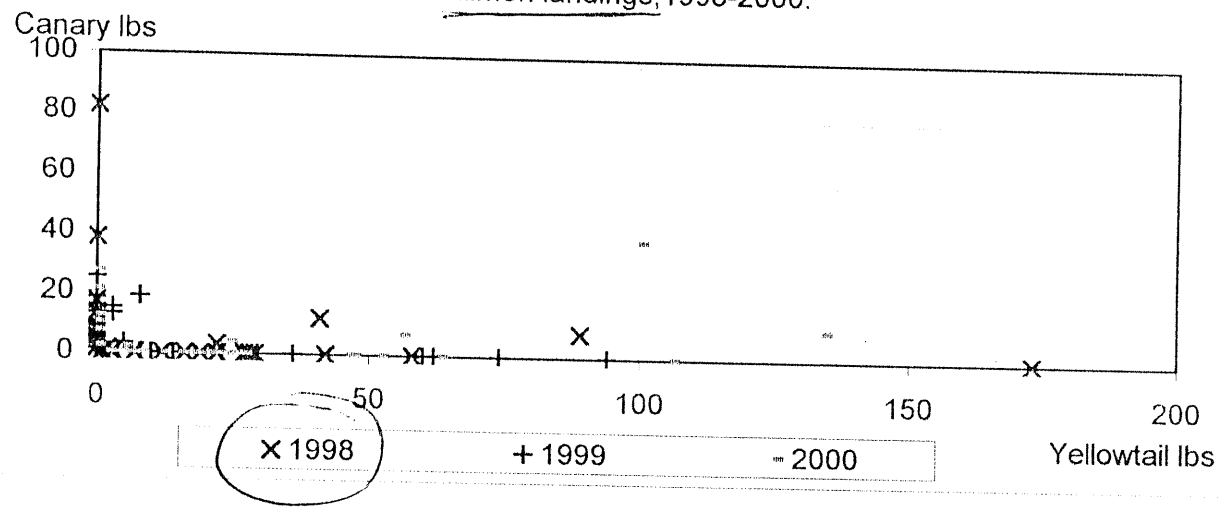


Douglas Fricke, President

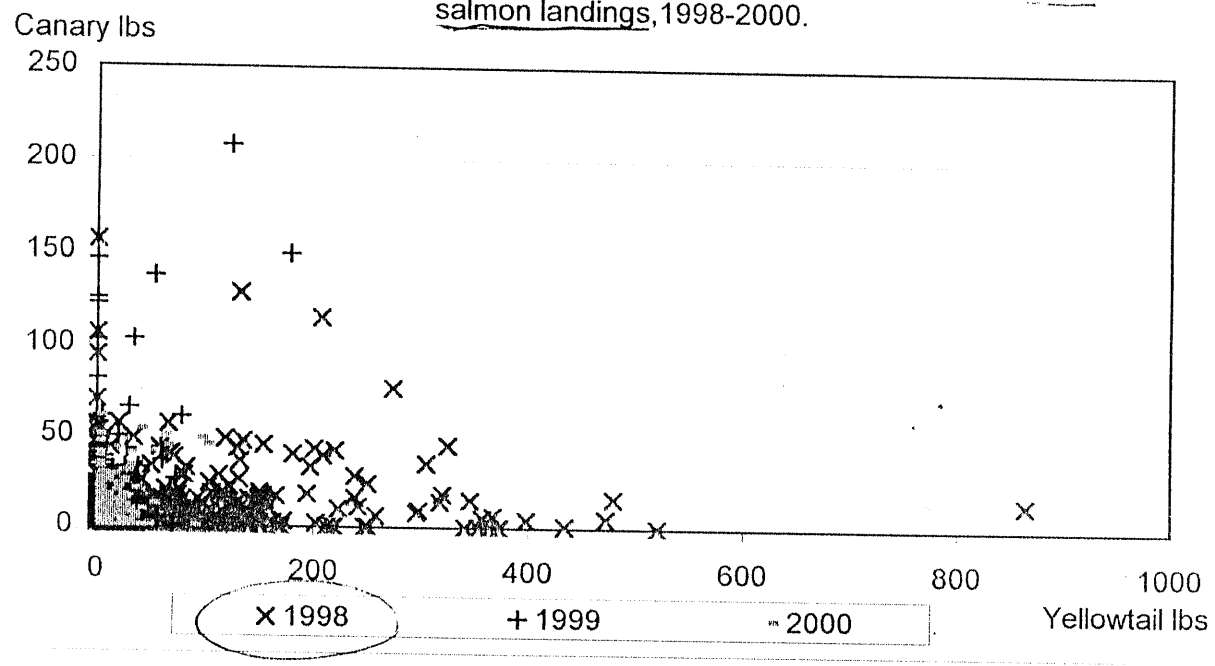
cc WDFW
ODFW
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Marks concentrated along axis indicate little coincidence between canary and yellowtail while salmon trolling

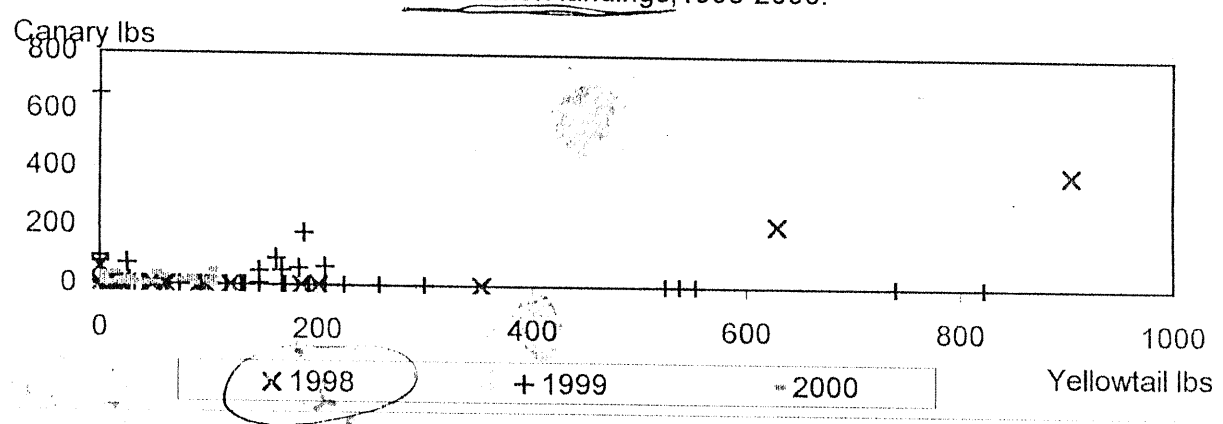
Coincidence of canary and yellowtail rockfish poundage in California troll salmon landings, 1998-2000.



Coincidence of canary and yellowtail rockfish poundage in Oregon troll salmon landings, 1998-2000.



Coincidence of canary and yellowtail rockfish poundage in Washington troll salmon landings, 1998-2000.



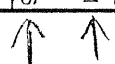
No yellowtail landings over 1000-lbs.

Table C2--Distribution of troll salmon landings, that had some canary or yellowtail rockfish, among categories reflecting the amount of poundage for each species.

1998-Of the 686 coastwide salmon troll yellowtail deliveries, 41 deliveries were over 200-lbs

Year / Yellowtail lbs in landing	California					Oregon					Washington					Coastwide								
	None	1-25	26-50	51-100	All	None	1-25	26-50	51-100	> 100	All	None	1-25	26-50	51-100	> 100	All	None	1-25	26-50	51-100	> 100	All	
1998																								
None																								
1-50 lb	17	3	1	1	8	56	4	6	4	2	66	4	4	1	1	1	1	4	216	62	5	6	2	75
51-100 lb	1	1			2	135	5	6	1	1	338	5	12	2	2	2	2	5	50	138	6	2	1	362
101-200 lb	1				1	79	9	5	1	1	129	2	7	1	1	1	1	2	80	80	5	5	1	136
>200 lb					10	40	6	6	1	1	69	2	3	1	3	3	5	2	22	40	9	9	1	72
All	19	10	1	1	31	268	30	30	8	4	638	13	13	1	3	17	300	338	31	31	10	7	686	
1999																								
None																								
1-50 lb	10	4			10	67	6	6	2	4	79	1	1	2	4	4	78	78	6	6	4	4	5	93
51-100 lb	4				14	73	14	14	2	1	208	2	2	1	24	24	49	79	14	14	3	3	1	146
101-200 lb					4	1	3	3	1	2	5	5	5	1	10	10	10	1	1	1	3	1	1	16
>200 lb					1	1	1	1	1	2	2	6	6	1	6	6	6	1	1	1	1	1	1	14
All	14	14			28	141	23	23	5	8	185	41	41	7	2	55	74	159	24	24	12	10	7	279
2000																								
None																								
1-50 lb	26	2	1		10	118	8	8	1	1	127	7	7	5	12	12	134	134	14	14	1	1	1	149
51-100 lb	2	1			28	119	14	14	2	2	227	5	10	2	17	17	123	131	16	16	2	2	2	272
101-200 lb	1	1			4	2	4	4	1	1	5	1	7	2	10	10	5	8	7	7				20
All	29	13	2		44	237	26	26	3	3	360	6	24	9	39	39	129	274	37	37	3			443
1998-2000																								
None																								
1-50 lb	53	9	2	1	28	241	18	18	7	6	272	8	8	5	17	17	274	274	25	25	11	7	7	317
51-100 lb	7	2	1		62	327	34	34	6	1	673	12	12	2	45	45	388	348	36	36	7	1	1	780
101-200 lb	2	1			10	80	12	12	2	1	142	7	7	2	20	20	65	89	15	15	2	2	2	172
>200 lb					3	40	9	9	1	3	71	8	8	1	14	14	29	42	10	10	3	3	4	88
All	62	37	3	1	103	706	79	79	16	12	1,194	60	28	10	8	111	503	771	92	92	25	17	17	1,498

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Ratio of yellowtail rockfish tonnage to salmon tonnage in west coast troll salmon landings containing both species, by state and ratio categories, 1997-2000.

Y'tail mts per salmon mt	California				Oregon				Washington				Coastwide			
	# of trips	Salmon mts	Y'tail mts	YT / Sal	# of trips	Salmon mts	Y'tail mts	YT / Sal	# of trips	Salmon mts	Y'tail mts	YT / Sal	# of trips	Salmon mts	Y'tail mts	YT / Sal
1997																
> 0 - .2	8	2.10	0.02	0.0	696	24 ⁰ 04	15.22	0.1	8	0.86	0.09	0.1	712	246.00	15.33	0.1
> 0.2 - 0.5	2	0.03	0.01	0.5	133	11	10.58	0.3	19	3.40	1.05	0.3	154	40.43	11.64	0.3
> 0.5 - 1					28	4.15	2.40	0.6	10	1.08	0.78	0.7	38	5.23	3.18	0.6
> 1 - 2					6	0.28	0.39	1.4	3	0.04	0.07	1.6	9	0.32	0.45	1.4
> 3					1	0.01	0.05	6.4	2	0.05	0.52	10.1	3	0.06	0.56	9.7
All	10	2.13	0.03	0.0	864	284.48	28.63	0.1	42	5.43	2.50	0.5	916	292.03	31.18	0.1
1998																
> 0 - .2	19	5.41	0.19	0.0	473	188.61	10.70	0.1	5	5.12	0.25	0.0	497	199.14	11.13	0.1
> 0.2 - 0.5	2	0.06	0.02	0.4	73	15.98	4.43	0.3	5	0.75	0.24	0.3	80	16.79	4.69	0.3
> 0.5 - 1					19	1.76	1.16	0.7	2	0.17	0.11	0.6	21	1.92	1.26	0.7
> 1 - 2	1	0.05	0.00	1.5	4	0.12	0.19	1.6	2	0.27	0.33	1.2	7	0.44	0.59	1.4
> 2 - 3					1	0.01	0.03	2.4	1	0.22	0.53	2.5	2	0.23	0.56	2.4
> 3	1	0.00	0.01	4.0	2	0.03	0.11	4.0	1	0.05	0.41	8.5	4	0.08	0.54	6.8
All	23	5.53	0.30	0.1	572	206.50	16.62	0.1	16	6.57	1.86	0.3	611	218.60	18.77	0.1
1999																
> 0 - .2	17	7.78	0.19	0.0	99	28.50	0.73	0.0	32	21.51	1.04	0.0	148	57.82	1.96	0.0
> 0.2 - 0.5	1	0.01	0.00	0.2	7	0.20	0.06	0.3	11	5.00	1.47	0.3	19	5.20	1.53	0.3
> 0.5 - 1					6	0.17	0.12	0.7	4	0.79	0.50	0.6	10	0.85	0.62	0.7
> 1 - 2					3	0.03	0.03	1.2	2	0.06	0.07	1.2	5	0.08	0.10	1.2
> 2 - 3					2	0.03	0.09	2.7	2	0.01	0.11	7.8	2	0.03	0.09	2.7
> 3					2	0.01	0.11	7.8	2	0.01	0.11	7.8	2	0.01	0.11	7.8
All	18	7.78	0.19	0.0	117	28.92	1.04	0.0	51	27.39	3.19	0.1	186	64.10	4.41	0.1
2000																
> 0 - .2	40	20.92	0.47	0.0	214	47.41	1.85	0.0	23	15.24	0.50	0.0	277	83.57	2.03	0.0
> 0.2 - 0.5	2	0.05	0.01	0.2	24	0.63	0.20	0.3	1	0.07	0.02	0.3	27	0.74	0.23	0.3
> 0.5 - 1	1	0.16	0.09	0.6	6	0.11	0.08	0.7	2	0.07	0.04	0.6	9	0.33	0.21	0.6
> 1 - 2					1	0.03	0.04	1.8	1	0.01	0.01	1.1	2	0.04	0.05	1.4
> 2 - 3	1	0.01	0.01	2.2									1	0.01	0.01	2.2
> 3					1	0.01	0.05	5.0					1	0.01	0.05	5.0
All	44	21.13	0.58	0.0	246	49.19	1.42	0.0	27	15.38	0.57	0.0	317	84.70	2.57	0.0
1997-2000																
> 0 - .2	84	36.21	0.86	0.0	1,482	507.57	27.70	0.1	68	42.75	1.88	0.0	1,634	586.53	30.44	0.1
> 0.2 - 0.5	7	0.14	0.05	0.3	237	53.81	15.27	0.3	36	9.21	2.78	0.3	289	63.16	18.09	0.3
> 0.5 - 1	1	0.16	0.09	0.6	59	6.17	3.76	0.6	18	2.11	1.43	0.7	78	8.43	5.28	0.6
> 1 - 2	1	0.05	0.08	1.5	14	0.45	0.65	1.4	8	0.37	0.47	1.3	23	0.88	1.19	1.4
> 2 - 3	1	0.01	0.01	2.2	3	0.05	0.12	2.6	1	0.22	0.53	2.5	5	0.27	0.66	2.5
> 3	1	0.00	0.01	4.0	4	0.04	0.20	4.7	5	0.11	1.03	9.2	10	0.16	1.25	7.8
All	95	36.57	1.10	0.0	1,799	568.09	47.70	0.1	136	54.77	8.12	0.1	2,030	659.43	56.91	0.1

63
Salmon
Troll
Total
1997
Yellowtail
Delv.
Salmon
Troll
1998
Yellowtail
Delv.

SKIPPED
NO DATA

85%

% <.2 in 1997	80%	99%	62%	81%	85%	53%	19%	16%	4%	78%	84%	49%
% <.2, overall	88%	99%	78%	82%	89%	58%	50%	78%	23%	80%	89%	53%

