
We Don't Do Allocation

Paul Krasnowski

Reprinted from the
Alaska Fishery Research Bulletin
Vol. 1 No. 2, Winter 1994

We Don't Do Allocation

Paul Krasnowski

The following message was presented at the American Fisheries Society, Alaska Chapter annual meeting in Sitka, Alaska, in November 1994. It was modified slightly for publication.

Does the State of Alaska advocate for things that are deemed to be in the public interest or that are appropriate for the general welfare of the people? Does the state routinely support and encourage health, education, economic growth, infrastructure development, and so on? Are commercial fishing, subsistence fishing, timber, mining, watchable wildlife, tourism, agriculture, aquaculture, and mariculture the kind of activities that a government should support and encourage? Should there be a recreational equivalent of the Alaska Seafood Marketing Institute? Although the answers seem self-evident, let's examine this a bit.

The question of advocacy and fishery management, specifically sport fishery management, is the topic I want to address. Is sport fishing a socially important good? Or phrased differently — what is good about sport fishing? I can think of 3 common categories of goods or benefits derived from sport fishing: food, economics, and recreation. Let's first take a closer look at food: While we recognize that sport fishermen often enjoy their catch as a meal, and some feel quite dependent on their harvest, I will make an arbitrary distinction and call dependence on the harvest *subsistence* and preference for the catch as food a part of *recreation*. And catching fish with sport gear is almost invariably more expensive than purchasing it. So let's ignore the fish-as-food aspect of sport fishing.

Let's now look at economics: Because an angler's fish in the round generally costs more than its clean and neatly wrapped counterpart at the grocery store, sport fishing is an economic stimulus. A brief exploration of the economics of sport fishing allows me the opportunity to use some very large numbers, and in any technical meeting of fisheries folks, we crave regular dosages of big numbers. The question at hand is this: Are the economics of sport fishing such that it should be considered a socially important good? A 1994 study funded by the U.S. Fish and Wildlife Service and conducted by the Sport Fish Institute using 1991 data provides the following:

- In 1991, there were about 50 million anglers who spent a half billion days fishing nationwide. They also spent \$24 billion while doing this. About half were trip-related expenditures, about \$3.7 billion went for fishing equipment, and about \$5.0 billion for boats, motors, and special equipment. (And all that was before I bought and outfitted my boat!)
- Anglers' expenditures generated about \$20 billion in worker earnings and supported 925,000 full-time-equivalent jobs! Total economic output was estimated at \$6 billion. This economic activity generated \$3.4 billion in state and federal taxes. License fees and excise taxes plowed back into the conservation and management of the nation's fishery resources totaled a half billion dollars.

Alaska is but a small part of this. In 1991, Alaska was 26th among the states based on angler expenditures and 34th based on the number of jobs supported. Nevertheless, from economics alone, there seems to be substantial reasons to support, encourage, and advocate for sport fishing.

Turning now to the last category — recreation — what is it that is compelling about sport fishing that is beyond satisfying the primordial impulse to hunt, gather, and store? Getting outside, getting away, and relaxing — it's a diversion, a hobby. For many, the availability and quality of sport fishing is an important aspect of our quality of life. Outdoor recreation, especially in Alaska, is an essential piece of our lifestyle. Is it not appropriate for government to protect and provide for sport fishing as a key component of outdoor recreation? Isn't outdoor recreation becoming more popular, in fact more necessary, as the state and nation grow and develop? And if so, shouldn't sport fishing opportunity be preserved and expanded as the population increases?

Author: PAUL KRASNOWSKI was the director of the Sport Fish Division, the Alaska Department of Fish and Game. Now retired, his current address is 234 Sudden Valley, Bellingham, WA 98226.

With this in mind, how does the State of Alaska advocate for sport fishing? We do so by identifying fish stocks that are appropriately used by sport fishermen and by assuring that use is sustainable. This wise use approach constitutes the definition of conservation; and wise use means that we manipulate fishing often (through regulation) not only to protect stocks, but to distribute and diversify fishing because the public demands variety in their fishing menu. We regulate areas for preferred gear or species; discourage harvest in certain areas; provide for easy-access, high-yield fisheries; and wilderness, no-harvest, catch-and-release fisheries.

If this has a familiar ring to a few of you, it is because these ideas form the basis of the Alaska Department of Fish and Game, Sport Fish Division mission statement; that is, we are responsible for

- conservation of stocks, and
- providing a diversity of sport fishing opportunity.

Is this consistent with other user group advocacy roles in the department? How about commercial fisheries?

The department's escapement goal policy starts in this way: "The Alaska constitution mandates the Department of Fish and Game to manage fisheries resources on a sustained yield basis. . . Unless otherwise directed by regulation, the department will manage Alaska's salmon fisheries for maximum sustained yield." Keep in mind that maximum sustained yield (MSY) is a concept applicable to commercial fisheries, not recreational fisheries.

Let me further demonstrate advocacy for commercial fisheries as reflected in a recent presentation to the Resource Development Council by an Alaska Department of Fish and Game deputy commissioner:

While fisheries have been our heritage, they have a bright future as well. There is considerable additional potential for Alaska's commercial fisheries. Despite the annual harvest of between 5 and 6 billion pounds of fish and shellfish, additional opportunities exist with unexploited marine resources including clams, sea urchins, sea cucumber, and a variety of kelp species. These marine resources already contribute millions of dollars to fishermen, and millions of additional dollars will accrue as these fisheries become more fully developed.

So, the state does advocate for fishing: sport, commercial, and subsistence. But clearly advocate means something more than just advertise; it means

actively defending or maintaining a position or a cause. And that is where we get all wrapped up in the other "A" word: *Allocation*. Does being an advocate inevitably mean taking an allocative stand? Not always, but often.

In order to approach this last question, let's briefly examine 3 pieces of management mythology: The first is, "I work for the resource," followed by "we need to keep the politics out of fishery management," and finally "we don't do allocation."

We don't hear the first as often in recent years. Perhaps staff have discovered that the signature on the paycheck is not a fin print. More likely, people have come to better understand that fishery managers are delegated a custodial role by the government on behalf of the people. In no way do we work for the resource. We have a public trust and responsibility to manage the yield — that is, the harvest — of a common property resource.

Our role is also closely enmeshed with the political process of promulgating and implementing rules for that harvest. Politics is the art or science of government; it is concerned with guiding and influencing governmental policy. Our job cannot be apolitical. So, though we don't "work for the resource," we do work for a political process charged with regulating harvest of a common property resource. Therefore, we "can't keep politics out of fishery management."

But do we "do allocation?" Let me reflect back about 20 years to my first season with the Commercial Fisheries Division when I worked in Bristol Bay. The managers had the demanding task of opening and closing several districts and subdistricts, ideally to meet, as exactly as possible, the escapement goals and allow the harvest of all surplus fish. The goals were calculated to assure MSY, not just sustained yield as mandated by state constitution and statute.

The managers opened and closed fishing periods at times carefully calculated relative to tide stage, not just fish movement. Timing of the periods was, and still is, a departmental prerogative. Skiff fishermen had to be able to get their boats off the beach, and setnet fishermen were obviously dependent on adequate water to float their nets. The loss of fishing opportunity by any of the harvesters was an important consideration in timing the opening. Is this allocation?

Fish returns to all districts varied in timing. Transfer of fishermen among the districts was limited by a 48-h mandatory waiting period. Setnetters and skiff fishermen were obviously tied more closely to a home district, whereas big-boat fishermen were mobile. Waiving the 48-h waiting period was within the department's discretionary authority. A decision

to waive or not waive the waiting period had clear allocative impacts.

Let's look at some other examples. At the end of the season in Bristol Bay there is a small coho salmon run fished by a very small proportion of the commercial fishermen and a growing number of sport fishermen upriver. There is one processor supporting the scratch fishing and little known of the run strength, except that it is small. The manager recently chose to leave the commercial fishery open because there were probably still surplus fish available, and he feared that, with a closure, the processor would depart and there would be no further commercial fishing. Is this allocation?

A state hatchery produces chinook and coho salmon that are stocked according to plans devised largely by committees of commercial fishermen. Release sites can be chosen to favor either sport or commercial fishermen or specific gear groups of commercial fishermen. Is there allocation here?

The Sport Fish Division issues a preseason emergency order because the projected sport catch in Southeast Alaska would exceed limits specified in the U.S./Canada Pacific Salmon Treaty. Within the framework of the board-promulgated management plan, the department decides to restrict sport fishing regionwide to a limit of 1 chinook salmon rather than adopt area-selective restrictions in areas such as Sitka, where the harvest rate is much higher, or implement a restriction that precludes charter operators from retaining fish. Are these choices allocative?

The division repeatedly recommends that the board adopt regulations limiting some waters to fly fishing gear. Would this restriction to protect the resource also become *de facto* allocation?

There are innumerable examples showing that we do "do allocation." Does the public really think that managers add up fish counts, refer to a run-timing table, and then look up their next move in a manual? Of course not. Fishery management is a tough job because of the unpredictability of the fish and the human impacts of our decisions.

Fortunately, we do have the primary political process orchestrated by the Board of Fisheries where major issues are debated and allocation is most often addressed. The department could not function at all if we had to arbitrate all allocative disputes. Much of the science we practice during the season requires as much objective distance as we can achieve. We get that distance through regulations and management plans. On the other hand, the department could not function at all if every decision that had an allocative outcome, that moved fish from one potential harvester to another, required Board of Fisheries deliberation and decision.

Our political system is adversarial. Our legal system is adversarial. Perhaps it is human nature to be adversarial. The board system minimizes the likelihood that adversarial politics will paralyze our management during the season. This gives managers the needed degrees of freedom to do their job, but the entire system is predicated on the assumption that our managers make decisions using discretion, value judgement, opinion, and broad experience with fishermen, in addition to their knowledge of fish biology. If you think that quantified fishery data is the lone, essential ingredient of a management staff meeting, then you've never been to one. Or, you haven't been listening.

Do you really believe that the Board of Fisheries, meeting for 10 d every 3 years for each management area, can create a supply of fishery remedies that will cure every ailment and answer every allocation dilemma? If I told you that key decisions on contentious fishery issues were routinely solved single-handedly by the local area manager without contrasting opinion, argument, or recommendation from other staff, would you feel any better? Perhaps, then, the truism, "we don't do allocation," is not that true.

Certainly, the big allocations are board stuff, but small allocation decisions are often department stuff. And in between is the grey area — those fishery allocation minefields. And that is as it should be.

We are fond of telling people how difficult fishery management is, how hard some decisions are to make, how much is on the line, and how quickly a decision can backfire politically if the fish or fishermen don't behave as predicted. Those things are true because we don't have a perfect, comprehensive, formulaic approach to management.

Advocacy, in the context of management decisions that have an allocative outcome, means that we should analyze probable impacts and outcomes of alternative decisions on a group of harvesters and recommend to the decision makers the management alternative that best fits board direction, that minimizes disruption to any segment of the fishery, that maintains broad opportunities to harvest, and that balances, and perhaps optimizes, competing uses. Success is often difficult to measure, and failure amounts to stepping on one of those land mines in the grey area. But, in the sense that these failures can trigger escalating political reaction that may lead to corrective adjustments within another part of the political arena or serve to readjust future decision making by managers, then perhaps such failures actually equate to progress.

Yes, the state should be an advocate for sport fisheries, as it is for many services and activities. And, the department's Sport Fish Division is the appropriate state agency to lead that advocacy.

The Alaska Department of Fish and Game administers all programs and activities free from discrimination on the bases of race, religion, color, national origin, age, sex, marital status, pregnancy, parenthood, or disability. For information on alternative formats for this and other department publications, contact the department ADA Coordinator at (voice) 907-465-6173, or (TDD) 1-800-478-3648, or FAX 907-586-6595. Any person who believes she/he has been discriminated against should write to: ADF&G, P.O. Box 25526, Juneau, AK 99802-5526; or O.E.O., U.S. Department of the Interior, Washington, DC 20240.