

M E M O R A N D U M

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke  
Executive Director



DATE: September 21, 1988

SUBJECT: Sablefish Management

ACTION REQUIRED

Review public comment and adopt a management alternative.

BACKGROUND

Pursuant to Council direction the staff further developed and released for public review the draft environmental assessment and regulatory analyses of management alternatives for the sablefish longline fishery off Alaska:

1. The status quo; continued open access management.
2. Multispecies longline fishery.
3. Individual Fishing Quotas.
4. License limitation.
5. Combination systems.

These alternatives are described in Item C-3(a), Chapter 5 from the analysis. Public comments, due by September 20, are included with a summary as Item C-3(b).

On September 16, 1988 Council staff met with NOAA/NMFS Alaska Region staff to discuss additional administrative and enforcement requirements should any of the management alternatives be adopted. A report from that meeting is included as Item C-3(c).

At this meeting, the Council is to decide which alternative to adopt and forward to the Secretary of Commerce for implementation. Any management alternative adopted by the Council will be implemented as amendments to the Gulf of Alaska and Bering Sea/Aleutian Islands groundfish fishery management plans. As noted in C-3(c), NMFS would not have the budget or manpower to implement a program before January 1, 1990.

## 5.0 THE PROPOSED ALTERNATIVES

Four alternatives to the current longline open access fishery are presented, all requiring specific gear allocations of sablefish in the Gulf of Alaska, Bering Sea, and Aleutian Islands, in addition to those put into effect by Amendment 14 to the Gulf of Alaska Groundfish FMP. By 1989 the Gulf longline apportionment of sablefish will be 95% of the total allowable catch (TAC) in the Eastern Gulf and 80% in both the Central and Western Gulf. In the Bering Sea and Aleutian Islands there are currently no allocations made specific to gear types (i.e., longline, trawl, pot, etc.). Therefore, the Bering Sea and Aleutian Islands Groundfish FMP must be amended to allow allocations by gear type if one of the proposed alternatives is chosen. For this analysis, the approximate distribution of harvests by gear in 1987 were used to fashion hypothetical longline allocations of sablefish: 50% of the Bering Sea sablefish TAC and 70% of the Aleutian Islands sablefish TAC.

### 5.1 Alternative 1: Open Access - use existing management measures to control effort.

This alternative would not restrict access to the fishery. It maintains the present management regime with existing management tools such as catch limits, area restrictions, shortened seasons, and trip limits available for use as necessary to conserve and manage the sablefish resource. Currently, only catch limit management, seasons, and gear allocations are used with the total allowable catch (TAC) divided between six areas (Figure 4.1). However, a proposal for split seasons in the Gulf of Alaska is contained in Amendment 17a to that plan (NPFMC, 1988a). The assignment of most sablefish TAC to the longline gear group would continue in the Gulf of Alaska. No change in management would result from choosing this alternative.

The need probably will arise to use other traditional management methods such as short, periodic openings throughout the year as with halibut, exclusive area registration as with crab, limitations on the amount or kind of gear (number of skates or hook spacing), trip limits as proposed for halibut by the International Pacific Halibut Commission (IPHC), or hold inspections as in the crab fisheries. All of these management tools attempt to control effort by reducing operating efficiency. These approaches and increased penalties were among those suggested by many of the participants during Council sablefish workshops. All workshop groups recommended increased penalties and enforcement regardless of the management system chosen.

Other management measures might also be instituted within open access, including the allocation of sablefish TAC in the Bering Sea and Aleutian Islands to specific gear groups, or allocation of specific amounts of sablefish TAC for bycatch in other fisheries. This second option is considered as Alternative 2 (Multi-species Longline Fishery).

### 5.2 Alternative 2: Multi-species Longline Fishery - allocate 25% of the halibut and sablefish longline apportionments for use as retainable bycatch in other longline fisheries.

This alternative management scheme would allocate 75% of the sablefish and halibut longline TACs to directed fisheries and 25% to bycatch in other longline fisheries. The total catch of each longline trip for Pacific cod, turbot, or other species would be allowed to contain 10% round weight each of sablefish and halibut. This would result in a minimum of 80% of the round weight being species other than sablefish or halibut. The remaining 75% of the sablefish and halibut longline TACs would be managed under their current regimes. Two options exist under this alternative:

1. Longline vessels would be allowed to participate in both the directed and bycatch fisheries.

2. Each longline vessel owner must choose, on a yearly basis, between the directed and bycatch fisheries.

This alternative goes well beyond just the sablefish fishery, and would require detailed integration with groundfish management in the Gulf of Alaska and Bering Sea/Aleutian Islands FMPs and halibut managed by the IPHC. Targeting on sablefish and halibut would still be legal out of season so long as neither sablefish or halibut exceeded 10% of the total catch. These limitations would need to be enforced dockside. The Bering Sea and Aleutian Islands area FMP would need amending to allocate the sablefish TAC between gear groups.

The second option, choosing between the directed or bycatch fisheries, would require vessel owners to notify NMFS each year of their elected fishery. This could be accomplished by choosing their exclusive fishery during the normal, yearly registration with NMFS.

Coordination with the International Pacific Halibut Commission. The implementation of this alternative involves cooperation in the allocation of halibut between the IPHC and the Council. For the complete implementation of the alternative, the IPHC must adjust their setting of catch limits and allow for retainable halibut bycatch. It is not certain on what time schedule they could accomplish such a change in management. Also, the IPHC management areas and the Council management areas do not match. Therefore, reporting and accounting for the bycatch would need to be coordinated by revised areas. It would, of course, be possible to have the IPHC realign their management areas to correspond to those of the Council. Again, it is unclear whether the IPHC would be able to make such adjustments in the time frame of this amendment.

An adjustment by the IPHC of TACS and areas to accommodate this management regime would require a biological rationale. Article III(3) of the Protocol Amending the Halibut Convention Between the United States of America and Canada for the Preservation of the Halibut Fishery of the Northern Pacific Ocean and Bering Sea limits the Commission's regulatory authority to the development and maintenance of halibut stocks so as to permit optimum yield. This section has been interpreted as mandating that the IPHC leave social and economic management of the fishery to others (Travers, 1983).

Assuming, for the sake of discussion only, that the multi-species longline proposal is based on the biological consideration of reduction of waste, then the Council may not be able to adopt regulations implementing this scheme without changing the statement of Halibut Management Goals adopted at the September 23-25, 1987 Council meeting. That statement reads in part, "To avoid conflict with the Commission's actions the Council will not adopt regulations that have the biological aspects of the fishery as their primary focus."

If the multi-species alternative has as its purpose social and economic goals, then implementation authority would rest solely with the Council under Section 5(c) of the Northern Pacific Halibut Act of 1982; however, the Council could not implement a regulatory scheme that conflicted with the IPHC management regime. Section 5(c) states in part, "The Regional Fishery Management Council having authority for the geographic area concerned may develop regulations governing the United States portion of Convention waters, including limited access regulations, applicable to national or vessels of the United States, or both, which are in addition to, and not in conflict with regulations adopted by the Commission." Section 5(c) also mandates that any allocation of halibut fishing privileges among U.S. fishermen be fair and equitable to all such fishermen, based upon the rights and obligations in existing federal law, reasonably calculated to promote conservation, and carried out in such a manner that no particular individual corporation or entity acquires an excessive share of the halibut fishing privileges. Implementation of this multi-species alternative would require coordinated action by the IPHC and the Council in response to both biological and socioeconomic concerns.

5.3 Alternative 3: Individual Fishing Quotas (IFQs) - use individual, transferable harvest rights to control effort.

The individual fishing quota alternative would consist of individual rights to fish issued to qualified participants. These rights would be denominated as a percentage of the longline sablefish TAC and would be granted based on performance in the years 1984 through 1987. They would only be issued to those participants landing 1,000 pounds or more in one of those four qualifying years. The rights would be fully transferable, that is leasable and saleable, in whole or part. Each IFQ would be specified by management area: Southeast Outside/East Yakutat, West Yakutat, Central, and Western Gulf of Alaska, Aleutian Islands, and Bering Sea. Only holders of IFQs would be allowed to land longline-caught sablefish. Three options involve who would be qualified recipients:

1. Vessel owners.
2. Permit holders.
3. A split of the IFQs between vessel owners and permit holders.

Determining an Individual Quota. Landings data from fish tickets for the years 1984 through 1987 would be collected from the State of Alaska Commercial Entry Commission and NMFS data files. These data would include all longline landings from the Alaska EEZ (regardless of the state in which landed). Yearly landings would be totaled for each permit holder and/or vessel owner. Each entity (permit holder or vessel owner or both, depending on the option chosen) would have their two best years landings averaged for each area. Vessels with multiple owners would have only one average. If landings were made in only one of the four years then that year's landings would be divided by two.

Averages from all qualified entities for each area would be added together to arrive at area totals. These area totals would be larger than the total of landings in any one year. Percentages of each area total would then be determined for each qualified entity by dividing their total by the area total. If both vessel owners and permit holders were considered eligible, the previous procedure would be conducted for each group. Then, each individual percentage would be multiplied by the respective group allocation percentage. A worksheet example of the procedure is given in Appendix II.

Upon assembling the landings files, each qualified recipient would be sent a packet detailing how the IFQ system would work. Each would also receive a list of their individual landings, average of two best years for each area, and the preliminary percentage of TAC they would be entitled to in each management area.

The initial allocation procedure can be conceived as follows:

1. Determine eligible group:
  - (a) Vessel owners.
  - (b) Permit holders.
  - (c) A percentage of the overall allocation to each group.
2. Organize data sets to determine each entity's landings by area and year. If both vessel owners and permit holders are eligible, an entity included in both groups would have landings counted in the procedures for each group.
3. Average each entity's two best years landings by area. Add these averages, by area, to arrive at area totals.
4. Divide each entity's average by the appropriate area total. This specifies the entity's percentage of the area total.
5. If both vessel owners and permit holders are eligible:

- (a) Repeat steps 3 and 4 for each group.
  - (b) Multiply each entity's percentage by the allocation that group will receive.
  - (c) For recipients represented in both groups, add their two percentages together.
6. Notify each recipient of their preliminary entitlements.

Verification of Entitlements. Those receiving entitlements would have the right to challenge their level of entitlements during a specified appeals period. Challenges could only be brought forth on the basis of errors in the data and would have to be substantiated by landings documentation. Appeals would be in writing and filed with the Regional Director of NMFS setting forth the reasons why the determination was in error.

In the case of multiple owners of single vessels (including companies, corporations, partnerships, etc.), owners would automatically be allocated IFQs based on the social security number and name registered with the United States Coast Guard. It would be incumbent upon the owners, outside of the appeals process, to rectify any differences between this method and actual vessel ownership percentages.

Initial Allocation of IFQs. After the specified appeals period, all individual entitlements would be added together, final percentages of the TAC by area determined for each qualified recipient, IFQs for each recipient determined based on that year's TAC, and IFQ entitlements mailed to each recipient. Each recipient would be charged a nominal fee to cover administrative costs.

When the IFQ system is first implemented, a pamphlet will be prepared by the Council and NMFS to describe how the system will work, how IFQs might be valued (future stream of profits), and how penalties would be assessed. This pamphlet would be mailed to all persons eligible to receive entitlements, all registered sablefish processors, and be available upon request. A copy of this pamphlet, updated, would also be mailed to all new IFQ owners. On a yearly basis, all IFQ owners, permit holders, and registered processors would receive notice of changes to the laws, TACs, etc.

Annual Renewals of IFQs. The IFQs would be reissued each year to legal owners of the harvesting rights upon payment of an annual administrative fee. These owners would be tracked through records submitted to NMFS. Annual poundage values of IFQs would be based on annual TACs. This means that as area TACs vary from year to year so would the poundage value of each individual IFQ entitlement.

Transferability. IFQs would be totally transferable in whole or part by lease or sale. That is, an IFQ holder would have the option of fishing some or all of his IFQs, selling some or all of them to one or more entities (including corporations and partnerships), leasing some or all of them to one or more entities, or any combination of the above. It would be possible for a private venture to establish a trading system for IFQs. All transfers would have to be reported to NMFS. Such a system would have to meet certain (as yet unspecified) NMFS approval in terms of reporting requirements and other criteria.

Monitoring and Enforcement. Any person or entity landing sablefish by longline or who processes or buys longline-caught sablefish would be required to have a federal fishing permit which would be issued annually for a nominal fee to cover administrative costs. This permitting process would aid in tracking IFQ landings and in enforcement. In addition, any entity landing longline-caught sablefish would be required to obtain, and register with NMFS, IFQs equal to the amount of sablefish landed.

Any landings tracking system would be designed to include fishermen, buyers, processors, and managers in the development phase in order to ensure its acceptability and workability. Since

IFQ management would allow the harvest of distinct amounts of sablefish, it would be necessary for NMFS to keep track of this harvest for catch limit management reasons and to protect the individual harvest rights of those obtaining allocations. The ability to track IFQ harvests through the processing sector and into the wholesale sector could greatly assist in the enforcement of IFQ use.

In order to be able to track control and use of IFQs, it might be necessary to utilize several types of confidential reporting forms. These might include fishermen reporting their estimated landings, buyers reporting the actual poundage landed, and processors reporting their purchases and/or sales. An example of such a reporting system, along with its projected administrative costs, is more fully described in Appendix I.

5.4 Alternative 4: License Limitation - control the number of vessels participating in the fishery by issuing transferable and nontransferable vessel entry licenses.

The license limitation alternative is a dual-level system whereby: (1) fully transferable licenses would be issued to vessel owners whose vessels made landings of 5,000 pounds or more in 1984, 1985, or 1986; and (2) non-transferable licenses with a two-year duration would be issued to those owners whose vessels landed less than 5,000 pounds of sablefish during those three years or whose vessel made their first landings in 1987. The transferable licenses would be saleable or leasable whereas the non-transferable licenses would be neither. Both types of licenses would be area specific between the Gulf of Alaska, Bering Sea and Aleutian Islands. The transferable licenses would be designated by vessel size category:

- Class A: Less than 40 ft.
- Class B: 41 to 50 ft.
- Class C: 51 to 60 ft.
- Class D: 61 to 70 ft.
- Class E: Over 70 ft.

Combinations of two licenses from the same size category and area could be used to upgrade to a single license in the next larger size category. All size measurements are based on U.S. Coast Guard vessel registration lengths.

Determination of Eligibility. Landings data from fish tickets for the years 1984 through 1987 would be collected from the State of Alaska Commercial Entry Commission and NMFS data files. These data would include all sablefish longline landings from the EEZ off Alaska regardless of the state of landing. The files would be organized by vessel and totaled for each on a yearly basis.

All vessels landing 5,000 or more pounds of longline-caught sablefish in one of the years 1984, 1985, or 1986 would be eligible for a transferable license. Any vessel landing longline-caught sablefish in any of those years but not totaling 5,000 in any single year would be eligible for a two-year non-transferable license. Any vessel making their first landings of any amount of longline-caught sablefish in 1987 would also be eligible for a two-year non-transferable license. Notifications of eligibility would be sent to owners of eligible vessels.

Verification of Entitlements. Challenges to entitlements would be allowed during a specified appeals period and would be processed in the same manner as those filed under Alternative 3 described above. Challenges could only be brought forth on the basis of errors in total yearly landings and must be substantiated by landings documentation. Upon completion of the appeals period, licenses would be issued to qualifying owners upon payment of a nominal fee to cover administrative costs.

Transferability. The licenses would be either transferable or non-transferable as specified earlier. All licenses would be reissued yearly, again with nominal charges to cover administrative expenses. Transferable licenses, good in perpetuity, would be issued by vessel size class as noted above.

These class licenses would be freely transferable in that they could be sold or leased with or without a vessel. However, they would have to be used with a vessel equal to or smaller than the size class of issue. No person or entity could own, lease, or use more than one operating transferable license per area. It would be possible for an entity to own a maximum of two licenses per area but only one would be usable during the year.

Vessel size classes would exist as a means of controlling expansion of effort in the fishery. The only way an entity could expand the size of the vessel they fish with would be to either buy a new license for a larger vessel size or to own two licenses of the same size class and area and trade them in to NMFS for one license of the next larger size class in the same area. This combination of licenses would, over time, reduce the number of vessels in the fleet, although it might not have the same effect on overall fishing capacity.

Non-transferable licenses would be issued to those qualified vessel owners who did not qualify for transferable licenses. The non-transferable licenses would not be size specific nor would they be saleable, leasable, or combinable. After the second year, no new non-transferable licenses would be reissued. All owners of non-transferable licenses who wished to continue longlining for sablefish would have to own a transferable license, of the appropriate size category, in order to fish after the second year.

Monitoring and Enforcement. Institution of a license limitation system would require increased administrative costs to track license ownership. NMFS would have to monitor ownership and control of the licenses to ensure that no more than two licenses in one area were controlled by any one entity. License checks would also be made at-sea and dockside. An example of such a reporting system, along with its projected administrative costs, is more fully described in Appendix I.

5.5 Alternative 5: Combination Systems - control the number of vessels participating in the fishery and/or the total effort by combining IFQs, license limitation, and/or open access systems.

There are four combination systems considered here although others are possible.

#### Combination System A - IFQ/License Limitation

This system allows qualified recipients to choose between the use of IFQs or licenses. Fishermen would have the choice of fishing in a competitive system among a limited number of participants or with a guaranteed harvest right. Such a system is designed to offer fishermen the maximum amount of freedom to fish as they choose while still restricting the overall effort by either limiting the number of vessels or allowing the market to determine optimal fishing effort with all inputs priced.

Qualified recipients would be vessel owners qualifying under the criteria for transferable licenses set out in Alternative 4. The first year, and each year thereafter, qualified entities would be mailed a notice detailing the amount of IFQs and type of license for which they qualified. The recipients would have the option each year of using their license or exchanging it for the IFQs. The IFQ allocations from those choosing to fish under the license system would be pooled for the license fishery.

The license fishery would operate as described in Alternative 4. The exact amount of sablefish apportioned to the fishery would vary from year to year as recipients moved between the fisheries. Similarly, the apportionment to the IFQ fishery, which would operate as described in Alternative 3, would also vary from year to year.

Entitlements would still be totally transferable; however, once NMFS was notified that an entitlement was sold on a permanent basis (as opposed to leasing for the year) subsequent reissues would be to the new owner. Licenses would continue to be issued by vessel size, but IFQs would not be vessel size specific. The limits on control of IFQs and licenses described in Alternatives 3 and 4 would still exist.

The intent of the system is to allow flexibility in fishing decisions. However, uncontrolled transfer between the two systems could result in excess gains by selling IFQs and then fishing in the license fishery. To eliminate this practice, it would be necessary to institute regulations ensuring that those switching to the license fishery would take with them the same quantity of IFQ entitlements as that license holder was originally issued. To ensure equality of opportunity and ease enforcement, no vessel would be permitted to fish in both the license and IFQ fisheries.

#### Combination System B - IFQ/Open Access

The second combination system examined consists of an IFQ system for permit holders and vessel owners landing over 5,000 pounds of sablefish during a qualifying period. The qualifications for and operation of the IFQ fishery would be as described in Alternative 3. The only difference would be that only a specified majority of the longline apportionment would be allocated to the IFQ fishery. The remaining percentage would be available for longline fishermen who would not possess IFQs, either because they did not qualify initially or because they were just entering the fishery. These non-IFQ holders would be limited to landing 5,000 pounds or less of longline-caught sablefish during any year. No vessel or person who controlled IFQs would be permitted to participate in both the IFQ and open fisheries.

#### Combination System C - License Limitation/Open Access

This combination system would consist of a license limitation fishery for vessel owners landing over 5,000 pounds of sablefish in a qualifying period. The qualifications for and operation of the license fishery would be as described in Alternative 4. The only difference would be that only a specified majority of the longline apportionment would be allocated to the license fishery. The remaining percentage would be available for longliners who would not possess licenses; they would be limited to landing 5,000 pounds or less of longline-caught sablefish during any year. No vessel or license holder would be permitted to participate in both the license and open access fisheries.

#### Combination System D - Competitive/IFQ

The system allows fishermen to choose between the continuation of open access or the use of IFQs. Eligible fishermen would have the choice, on a yearly basis, of fishing in a competitive open access fishery or in an IFQ fishery; other fishermen could also participate in the open access fishery. Such a system offers fishermen the maximum amount of freedom in choosing between systems. In addition, a specified minimum amount of TAC would be reserved for the open access fishery to ensure the opportunity for fishermen to participate in sablefish longlining without acquiring IFQs.

Qualified recipients would be as described in Alternative 3. Their initial IFQ allocations would be as described in that alternative multiplied by the percentage of TAC allocated to IFQs (as in



Combination System B). The first year, each qualified recipient would be mailed a notice detailing the amount of IFQs for which they qualified. They could choose to fish in the IFQ fishery or surrender their IFQs to fish in an open access fishery. The open access fishery would have a TAC consisting of the minimum specified amount plus an amount equal to all of the IFQs surrendered by fishermen wishing to fish competitively.

Beginning in the second year and each year thereafter, fishermen with IFQs could surrender them and fish in the open access fishery. New entrants to sablefish longlining would be allowed to fish in the open access fishery at any time without a need to obtain IFQs.

Fishermen (as defined in the initial allocation, that is, vessel owners or permit holders) who wished to change from the open access fishery to the IFQ fishery would receive IFQ allocations equal to the percentage of the overall (as opposed to open access) TAC that they harvested in the preceding year. Fishermen could also enter the IFQ fishery by purchasing or leasing existing IFQs. At such time as all allowable IFQs were allocated, no new transfers to the IFQ fishery would be considered unless IFQs equal to that amount had been surrendered for inclusion in the open access fishery.

The intent of the system is to allow flexibility in fishing decisions. However, uncontrolled transfer between the two systems could result in excess gains by selling IFQs and then fishing in the open access fishery and acquiring new IFQs. To eliminate this practice, it would be necessary to institute regulations ensuring that those switching to the open access fishery would take with them the same quantity of IFQ entitlements as they were originally issued. To ensure equality of opportunity and ease enforcement, no vessel could fish in both open access and IFQ fisheries.

It would be the intent of the Council that participants in the IFQ fishery could not sell their IFQs and then earn more in the open access fishery.

## LOONGLINE SABLEFISH MANAGEMENT: SUMMARY OF PUBLIC COMMENT

### Alternative 1: Maintain open access (status quo).

Oliver Holm, Kodiak Longliner's Association - Strongly urges support of continued open access. He explained, by using the seven identified problems of open access, why limited access would worsen the fishery's problems and social costs. He also stated that, with IFQs in particular, the Japanese might come to dominate the ownership of harvest rights.

IPHC - The continuation of open access is considered unacceptable due to increased problems with quality, safety, enforcement, wastage, and quota management.

David Shrader, Kodiak - Strongly supports continued open access. He states that open access provides the maximum amount of jobs and economic benefits, allows for diversification of the fishing fleet, provides flexibility for developing new fisheries, and provides for effective resource conservation.

### Alternative 2: Set aside a portion of the sablefish and halibut longline TAC as bycatch in other longline fisheries.

IPHC - The multi-species fishery management approach would resolve few problems but would require considerable coordination with halibut management. The Commission would be unwilling to move boundaries to facilitate this alternative. The analysis underestimates the potential problems of discard of halibut in the Pacific cod fishery. Increased longlining for Pacific cod, as opposed to the use of pots, would greatly increase halibut mortality.

Calvin Robinson, Juneau - Such an approach defies logic. Pacific cod and rock fish fisheries are only marginally profitable while sablefish and halibut fisheries are economically sound.

David Shrader, Kodiak - A multi-species approach such as proposed by this alternative would improve the fishery but may, in fact, make matters worse.

David Tarr, Port Townsend - The Council should adopt the multi-species approach with vessels choosing on a yearly basis whether they have access to the directed fishery or to 50% of the TAC reserved for bycatch. Such a distribution of the TAC would allow for increased prospecting, development, and financial stability in other fisheries such as Pacific cod.

### Alternative 3: Institute an Individual Fishery Quota (IFQ) limited access management system.

Dennis Hicks, Sitka - IFQs seem to be the most desirable alternative, although those fishermen leasing vessels might not be rewarded for their effort and pioneering work in the fishery.

Thomas Hoffman, Booth Fisheries, Seattle - Strongly supports IFQs. Such a management system would provide for a continuous supply of fresh sablefish and increase the edible weight yield per fish.

IPHC - Strongly recommends the Council move towards IFQs to help resolve many management problems. From a national perspective, open access fishing is very expensive and the advantages of IFQs outweigh fishermen's lifestyle arguments. An IFQ system would require coordination with the IPHC but the Commission does not foresee any administrative constraints.

David Little, Clipper Seafoods, Seattle - This alternative should be rejected since it would restrict freezer/longliners and slow development of Pacific cod longlining.

Norman Little, Cordova - IFQs are the best alternative. IFQs should be issued to permit holders with a 2% ownership limit per person. The years 1985 and 1986 should be used to qualify, IFQs should be transferable, and the IFQ owner should be required to be onboard the vessel whose landings are made. Permit holders should be the recipients because their livelihood depends on direct participation.

Calvin Robinson, Juneau - Recommends eventual adoption of this system after the implementation of license limitation. It is better to make a one-time investment in access rights for a stable fishery rather than unknown amounts of money each year for an unstable fishery.

Alternative 4: Institute a License Limitation limited access management system.

Dennis Hicks, Sitka - He is concerned that those fishermen leasing vessels might not be rewarded for their effort and pioneering work in the fishery.

IPHC - Too many vessels would reduce the effectiveness of this alternative although it might, at best, prevent a bad situation from getting worse.

David Little, Clipper Seafoods, Seattle - This alternative should be rejected since it would restrict freezer/longliners and slow development of Pacific cod longlining.

Calvin Robinson, Juneau - This form of limited access should be implemented, preferably followed by IFQs.

Alternative 5: Combine different forms of management systems.

Option A: IFQ/License limitation. Issue both IFQs and licenses to qualified entities. Participants would have the option, on a yearly basis, of choosing which system they wished to fish in.

Option B: IFQ/Open access. IFQs would be issued to qualified entities but a portion of the TAC would be reserved as an open access fishery for those not utilizing IFQs.

Option C: License limitation/Open access. Licenses would be issued to qualified entities but a portion of the TAC would be reserved as an open access fishery for those not utilizing licenses.

Option D: Competitive/IFQ. IFQs would be issued to qualified individuals and a specified minimum TAC reserved for an open access fishery. Participants could switch between the two systems on a yearly basis.

IPHC - The option of competitive/IFQ is second best to a strict IFQ alternative since it would allow fishermen to "vote" for a system while allowing them the latitude to change their minds on a yearly basis.

David Little, Clipper Seafoods, Seattle - This alternative should be rejected since it would restrict freezer/longliners and slow development of Pacific cod longlining.

David Shrader, Kodiak - None of the mixed alternative options would reduce fishing pressure and should not be considered if that is the object of changing management.

Other Comments:

State of Alaska Representative Cliff Davidson and State Senator Fred Zharoff - The Council should delay action on this matter until the December meeting to allow for more and better public participation in the review process.

Peter Schmidt, Marco Seattle - Some form of limited access is required for long term management. His immediate concern is that the proposed cut-off dates would eliminate the introduction of freezer/longliners into the fishery, vessels which produce high quality product.

David Shrader, Kodiak - The timing of both the release of the document and the review period were poorly planned due to fishing seasons. He suggests an additional review period, perhaps in October or November. He states that limited access of any sort will not facilitate or enhance fishery resource conservation efforts, places no cap on maximum fleet effort, will artificially increase fishing effort in other fisheries if done in only some fisheries, concentrates the economic benefits from the fishery to a small number of interests, and are irreversible.



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REPRESENTATIVE CLIFF DAVIDSON

District 27

Box 746, Kodiak, Alaska 99615

September 1, 1988

John Peterson, Council Member  
North Pacific Fishery Management Council  
PO Box 103136  
Anchorage, Alaska 99510

Dear John,

We respectfully request that the time period given for the public to comment on the EA/RIF/IRFA for sablefish management in the Gulf of Alaska be extended.

Many fishing constituents have contacted us with their concerns regarding the short amount of time remaining before the public review deadline. Having been at sea pursuing their livelihoods they have not been able to give the necessary amount of deliberation to this report in order to submit thoughtful and intelligent comments.

As the next meeting of the NPFMC is scheduled for late September and the sablefish management review is on that meeting's agenda, we would again respectfully request that the Council delay consideration of this matter until the December meeting, thereby allowing time for more and better public participation.

With best regards,

Cordially,

*Cliff Davidson*

Cliff Davidson  
State Representative  
District 27

*Fred Zharoff*

Fred Zharoff  
State Senator  
District N

CD/FZ/s11

cc: C. William Verity, U.S. Secretary of Commerce  
Frank Murkowski, U.S. Senator  
Ted Stevens, U.S. Senator  
Don Young, U.S. Representative

726 Siginaka Way  
Sitka, Alaska 99835

RECEIVED

8 29 1988

August 24, 1988

North Pacific Fishery Management Council.  
P.O. Box 103136  
Anchorage, AK 99501

Gentlemen:

Of the five sablefish management alternatives, the one that seems most desirable to me is the individual fishing quota.

However, to me personally the greater question is how the points for licenses are distributed and who gets those licenses. If the Council decides to award the license to the owner of the boat and not to the skipper, a special consideration should be given to those who leased a boat during the target years.

Many of those persons, like myself, have a long and rich history in the fishery. In 1976, I was fishing black cod off Kruzof Island. The only other boat that I know of on the coast was the Unimak up off Chichagof Island. A few years later, after going to Nova Scotia to view the Mustad automatic system, I put the Huff longline system on my boat, the DONNA LEE. By 1985, black cod had grown into a big boat fishery so I leased the C-LADY, a 65-foot boat, and started fishing on January 1 when the fishery opened.

I've helped pioneer the modern black cod fishery. I've fed my family and I've risked my life fishing black cod. If I'm denied a permit because I've leased a boat during certain years, it will be morally and ethically wrong.

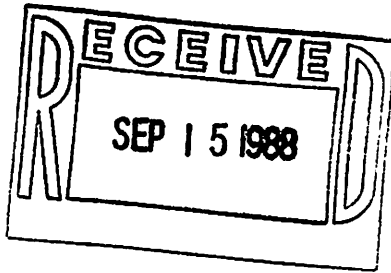
Sincerely,



Dennis Hicks



Booth Fisheries Corporation  
Western Division  
814 Sixth Avenue South  
Seattle, WA 98134-1304  
(206) 623-1011



September 14, 1988

North Pacific Fishery  
Management Council  
605 W. 4th Avenue  
Anchorage, Alaska 99510

Dear Council:

I am writing in regard to the five sablefish management alternatives for which the public comment period closes at 5:00 pm on September 16, 1988.

Booth Fisheries Corporation strongly supports the individual fishing quotas, with a season from May through October. The advantages of this method are:

1. A continuous supply of fresh sablefish, which is in much demand from May through October.
2. An opportunity for the fishing industry to maximize the quantities of frozen sablefish produced, by targeting the bulk of the fishing in September, when the fish are at their maturity, thereby producing the greatest edible weight yield into the frozen market.

As an interim alternative, we would support the alternative providing for 25% of the quota to be caught in May and 75% to be caught in September.

Booth Fisheries is the largest distributor of fresh and frozen seafood in the United States. I am writing on behalf of our tablecloth restaurant and retail supermarket customers who continually express concern over the unevenness in supply of fresh sablefish.

From the consuming public's point of view, it is an environmental waste that we are permitting sablefish to be caught and put in freezers before they have grown to full maturity.

Please contact me at (206) 382-4624 if you have any questions about our position in this matter, or if Booth Fisheries Corporation can assist in expanding the supply of top quality fresh and frozen sablefish.

Sincerely,

Thomas Hoffman  
Vice President  
Distributor Operations  
Western Division  
TH/jh

September 18, 1988

KODIAK LONGLINER'S ASSOC.  
P.O. Box 3406  
Kodiak, AK 99615

TO: N.P.F.M.C.

RE: Comments on Sablefish Management Options

Dear Mr. Chairman:

I wish to comment on the sablefish management alternatives. A year ago the Council issued a Statement of Commitment for sablefish limited entry. I hope that this review process isn't just viewed as a formality by the Council. I am sure that many fishermen who feel as I do about this issue believe it is pointless to address their views to the Council.

On behalf of the Kodiak Longliner's Assoc., I strongly urge the Council to vote for alternative 1--Open Access. While some of the perceived problems with open access are real, we feel the problems and social costs of limited access schemes are worse. Going through the problems of open access as listed by the drafting team:

**GEAR CONFLICT** There was a serious gear conflict with the Japanese longliners when this fishery tried to restart in the Central Gulf. Co-operation is essential to avoid gear conflicts. Kodiak boats have found some of the oldest participants is the fishery to be the worst offenders. There will always be lost gear in the sablefish fishery due to the steep slopes and often unpredictable currents.

**DEADLOSS** While significant amounts of fish are lost with the gear, I know of no evidence that "ghost" fishing is a problem with longline gear. The level of waste is far less than that commonly occurring in trawl fisheries.

DISCARD K.L.A. requested allocation of some of the sablefish quota for by-catch, two years ago. We were told that the mortality was too low to justify it. There is no reason that by-catch can't be allowed for in conventional fisheries management. It is common knowledge that in New Zealand that discard still goes on under the I.F.Q. system.

ECONOMIC EFFICIENCY in open access is obviously less than under a monopoly. The availability of jobs and investment opportunities in our economy acts as a regulator of fishing effort. If fishing profitability falls, effort falls. When it increases, effort rises. This is directly observable in statistics for open access fisheries in Central and Western Alaska. It is a fallacy that effort inevitably increases until no one makes any money. Any gains in profits via limited entry will tend to be lost for later generation fishermen. I have never seen any evidence that consumers get cheaper fish because of limited entry. Any raise of income by limited entry will lead to a corresponding loss of income to excluded groups.

PRODUCT QUALITY does not have to be poor in short openings. Many fishermen continue to produce excellent quality fish. The fact that other fishermen produce poor quality product points up a problem in our processing sector. You get what you pay for. Only rarely is there any difference in price between the best quality fish and poor quality fish. Overall, I guess the product quality isn't too bad because prices were at record levels this year. None of the limited access proposals will exclude people who habitually deliver poor quality product.

VESSEL SAFETY would seem to be compromised by short seasons. Actually, I haven't seen this. A comparison of the losses in the nearly year-round trawl fisheries with less than 200 vessels compared to the longline fisheries would probably show a higher loss rate for the trawlers. Since my father is a marine surveyor, I often hear the details of the casualties. There aren't many accidents that would have been prevented by longer seasons. The insurance industry give lower rates to owner operator vessels than it does to absentee owned vessels. This would speak against any limited entry system that would reduce the percentage of individually owned and operated vessels. Longer seasons would largely benefit larger over-capitalized vessels and make corporate ownership of the resource possible.



CATCH LIMIT MANAGEMENT could be easier with limited entry, but effort is only one variable in a real fishery. Catches still have to be monitored well in any system. The current ability to close seasons to arrive at the TAC is far greater than the precision of the information to set the TAC to begin with. An IFQ system could be expected to lead to more cheating and an extremely complex enforcement problem. Fishermen unable to sell sablefish legally, may just use it for bait.

Of the limited access proposals the COMBINATION SYSTEM C would be the least damaging to the fishery and be preferred over the other limited entry systems. Contrary to what NPFMC poorly attended workshops reported, we see very little support for the IFQ system. I was told that the Homer based North Pacific Fisheries voted for it but with a majority of only one vote. A survey conducted by K.L.A. and U.F.M.A. of sablefish permit holders in '85 '86 & '87 clearly showed an overwhelming preference for the license limitations system over IFQ's. Also, Canadian sablefish fishermen rejected the ITQ system. It is easy to foresee that the IFQ system will lead to the elimination of the owner operated vessels and their shore plants and replace them with fewer vertically integrated corporate owned catcher processors. Since the Japanese control the best market for sablefish, it is clear that they will have a big advantage over U.S. citizens when it comes to bidding for IFQ's. IFQ's will likely be very expensive in the future for fishermen that have to buy them. This will eat into profits, reduce crew shares, reduce money spent on vessels (a safety concern) and expose individual fishermen to greater financial risks. With hundreds of millions of dollars invested in IFQ's you can imagine the pressure to increase the TAC if the price drops or resource abundance decreases.

An analysis done for the Council on the shares system for the halibut fishery estimated the market value of shares. For a vessel my size (44") to buy into the fishery, and catch what I catch in an open access fishery, would require a capitilization of around a million dollars! It is little wonder that the Council suppressed this report. The banks would be the big winners in an IFQ system. They would gain a lot of extra business.

K.L.A.  
page 4

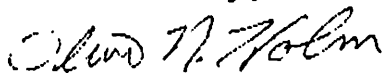
It is clear from the New Zealand experiment with IFQ's that government intervention to protect our coastal communities will be necessary. Unfortunately, our system probably would not work that way. It is our position that the government allow equal access to our fishery resources to all citizens. Coming in later to try to adjust for social inequities caused by the I.F.Q. system will be expensive and unfair to some participants, and possibly illegal.

Limited access is often touted as necessary to prevent overfishing. It is not. The number of fish taken determines the health of a stock along with natural variables. Limited access is an allocation of potential wealth and should be analyzed as such. It is not surprising to hear fishermen claiming it is necessary for whatever reason as they would be the recipients of a one time free gift of substantial worth. What is surprising is that nearly half of the sablefish permit holders we surveyed were not in favor of any limited access system.

Federal policy in timber and grazing lands are often pointed to as reasons to change our open access fisheries to limited access. You don't have to look very far to see unfair competition, habitat degradation, court suits on price fixing, problems in burgeoning bureaucracy and a net loss for the taxpayer.

I resent the intervention into a cultural heritage that is thousands of years old, and now has the benefit of modestly scientific stock assessment, in order to have a big experiment in economic theory tested for the University of Washington-School of Fisheries theology. The empirical evidence doesn't justify the experiment and no one is going to compensate the losers.

Respectfully,



Oliver N. Holm, President  
Kodiak Longliner's Assoc.

COMMISSIONERS:

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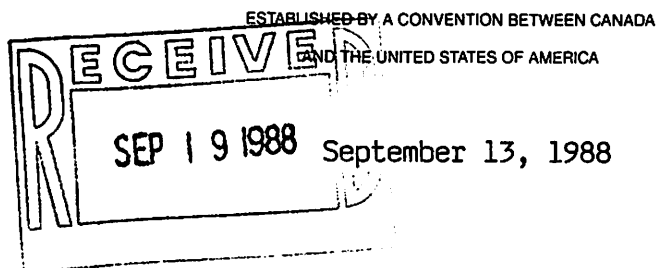
INTERNATIONAL PACIFIC HALIBUT COMMISSION

DIRECTOR  
DONALD A. MC CAUGHRAN

P.O. BOX 95009  
SEATTLE, WA 98145-2009

TELEPHONE  
(206) 634-1838

FAX:  
(206) 632-2983



Dr. Clarence Pautzke  
North Pacific Fishery Management Council  
PO Box 103136  
Anchorage, AK 99510

Dear Clarence:

The staff of the Halibut Commission has reviewed the draft EA/RIR/IRFA for sablefish management for the Gulf of Alaska and the Bering Sea-Aleutian Islands regions. The management program selected for sablefish may well be a model for halibut, and we have reviewed the document with the future of halibut in mind. We strongly recommend that the Council move firmly toward Individual Fisherman Quotas (IFQ's), which we believe will help resolve many management problems. The license limitation and multi-species longline fishery alternatives are only pseudo-solutions that may actually increase management difficulties. The following sections provide rationale for our recommendation.

IFQ The draft document clearly addresses the advantages of an IFQ system in terms of generating benefits to the nation and to the American consumers who own the resource. We support these conclusions.

The drawback identified in the document is elimination of competitiveness that many fishermen believe is the essence of commercial fishing. However, competitive fishing is very expensive to the country, including the fishermen. Fishermen would be much more productive if they competed to increase quality and decrease cost of harvest. The time has come to include a broader perspective in determining how management should proceed, and to look beyond life style arguments. Fishermen also claim that ability to move among fisheries is reduced by any limited access program, but IFQ's clearly allow fishermen to obtain access to a mix of species for which IFQ's may be set. An IFQ system would require coordination between the NPFMC and the IPHC. I'm sure that we could resolve any administrative difficulties for a management regime that offered real solutions.

Mixed Species Longline Fisheries We agree with the draft document that few management problems would be solved by a multi-species longline fishery that used part of the halibut and sablefish catch limits to encourage development of the Pacific cod fishery. Smaller quotas for halibut and sablefish would intensify these directed fisheries. Coordination with the IPHC for management areas, timing and setting of catch limits, and collection of fishery data could take considerable effort; we have not had time to address these issues in detail. However, IPHC management areas are used to apportion harvest of the stock by its productivity; the Commission would be opposed to moving boundaries to facilitate an alternative that will not solve the many management problems that exist.

The draft document also understated the potential problems of discards of halibut. Halibut bycatch rates currently used in the Gulf of Alaska for the Pacific cod longline fishery are very low; limited observer data and anecdotal information from the fleet indicate that actual bycatch rates are substantially higher. If the bycatch rate is higher than the allowable retention proportion, and all allowable groundfish are taken, then total discard mortality could be much higher than current bycatch limits.

The examples in the attached Table demonstrate this point by examining halibut mortality in a mixed species fishery with and without retention, using the following assumptions. Extrapolating the ADF&G observer program data (News Release of March 3, 1988) suggests a bycatch rate of approximately 0.20 by weight; about 14 halibut per metric ton of groundfish in the Pacific cod fishery converts to 378 round pounds per mt at an assumed 27 pound average (this is a 20 pound average dressed weight, about half the size observed in the commercial fishery near Kodiak Island):  $378/2205=0.17$ . IPHC observers on two Pacific cod trips near Kodiak Island showed nearly equal weights of halibut and Pacific cod; arbitrarily reducing this by half gives a rate of 0.50 for calculating purposes. The mixed species alternative would allow 10% retention each of halibut and sablefish of the total trip, or a ratio of 1:8 (0.125) of halibut or sablefish to other groundfish. The draft document suggests that 25% of the halibut catch limit would need about 60,000 mt of groundfish (mostly Pacific cod) in a mixed species longline fishery, while status quo is about 10,000 mt of groundfish.

In either example of a 60,000 mt groundfish harvest, the directed halibut fishery not only loses 7,500 mt to the multi-species fishery, but also an additional quantity from increased discard mortality that may be expanded to account for growth. The discard mortality increases as the groundfish catch goes up and as the bycatch rate increases. This alternative would be an improvement to status quo only if the longline groundfish (Pacific cod) fishery does not increase. If the Council wished to provide incentives to increase the Pacific cod harvest, the IPHC staff recommends that pot fishing be emphasized over longlining to hold down the bycatch mortality.

License Limitation Reduction of licenses after two years by the number of two-year permits would make only short term improvements. Too many vessels with incentive to increase fishing power will prevent this alternative from being effective. At best, it will prevent a bad situation from getting worse, so is better than status quo.

Status Quo Few improvements in the harvest management can occur with status quo, and further deterioration is likely. We believe that status quo is unacceptable. We agree with the draft document's evaluation of this alternative. Under status quo, the condition of the sablefish fishery will move toward that of the halibut fishery, and will suffer from increased problems with quality, safety, enforcement, wastage, and quota management.

Combination Systems As a second choice behind an IFQ system, we would prefer a combination system that would include IFQ. Of the combinations, IFQ and open access would be our choice. Those fishermen using IFQ would be able to demonstrate advantages and disadvantages of that system, while fishermen opposed to IFQ would be able to fish under the current regime. Fishermen would be able to "vote" for one or the other system by moving from one to the other,

and administrators would be able to compare systems for best net benefit to the nation.

Thank you for the opportunity to comment on the proposed alternatives for sablefish management. We believe that Council action on sablefish will have a major impact on the management program for halibut. We encourage you to move forward with innovative and effective management for the benefit of all citizens, by selecting an IFQ system.

Sincerely,

*Stephen H. Hoag*

for Donald A. McCaughran  
Director

Table 1. Examples of halibut mortality in the Pacific cod longline fishery with and without retention.

1) Assume a halibut bycatch rate of 0.20 and a Pacific cod TAC of 10,000 mt.

Pac. Cod TAC (A)	Halibut Bycatch (A * 0.20) (B)	Halibut Bycatch Mortality (B * 0.25)	Retention Rate (C)	Halibut Retained (A * C) (D)	Discards (B - D) (E)	Discard Mortality (E * 0.25)
10,000 mt	2,000 mt	500 mt	0.125	1,250 mt	750 mt	190 mt

2) Assume a halibut bycatch rate of 0.20 and a Pacific cod TAC of 60,000 mt.

Pac. Cod TAC (A)	Halibut Bycatch (A * 0.20) (B)	Halibut Bycatch Mortality (B * 0.25)	Retention Rate (C)	Halibut Retained (A * C) (D)	Discards (B - D) (E)	Discard Mortality (E * 0.25)
60,000 mt	12,000 mt	3,000 mt	0.125	7,500 mt	4,500 mt	1,125 mt

3) Assume a halibut bycatch rate of 0.50 and a Pacific cod TAC of 10,000 mt.

Pac. Cod TAC (A)	Halibut Bycatch (A * 0.50) (B)	Halibut Bycatch Mortality (B * 0.25)	Retention Rate (C)	Halibut Retained (A * C) (D)	Discards (B - D) (E)	Discard Mortality (E * 0.25)
10,000 mt	5,000 mt	1,250 mt	0.125	1,250 mt	3,750 mt	940 mt

4) Assume a halibut bycatch rate of 0.50 and a Pacific cod TAC of 60,000 mt.

Pac. Cod TAC (A)	Halibut Bycatch (A * 0.50) (B)	Halibut Bycatch Mortality (B * 0.25)	Retention Rate (C)	Halibut Retained (A * C) (D)	Discards (B - D) (E)	Discard Mortality (E * 0.25)
60,000 mt	30,000 mt	7,500 mt	0.125	7,500 mt	22,500 mt	5,625 mt

791  
CLIPPER SEAFOODS, LTD.  
4019 21st Avenue West  
Suite 202  
Seattle, Washington 98199

North Pacific Fishery Mangement Council  
James O. Campbell, Chairman  
P.O. Box 103136  
Anchorage, AK 99510

August 17, 1988

Dear Mr. Chairman:

I have read the draft of the sablefish management plan for the Gulf and Bering Sea/Aleutians, and am greatly disturbed as to the adverse economic impact this would have on several large American factory longline vessels that have just recently gone into service.

Since the inception of the Magnuson Act the goal has been for the U.S. fishing and processing fleet to grow to a size capable of fully utilizing American ground fish resources. In order to do this for certain species, we must have new and larger factory vessels.

The true future for American factory longliners lies with Pacific cod. However, to justify the high cost of building a large factory longline vessel, owners must have access to an alternate high value species like sablefish to help achieve acceptable economic results.

The exclusion of future entries into the black cod fishery (or at high cost) will greatly diminish the economic viability of new factory longline projects directed at Pacific cod, and thus slow the Americanization of groundfish in Alaska.

I urge you to reject alternatives 3,4, and 5 as outlined in the draft based on the fact that these prposals will slow the development of a viable American Pacific cod longline fishery.

Regards,



David Little  
President

MAR 31 1988

March 29, 1988

To: North Pacific Fisheries Management Council  
 P.O. Box 103136  
 Anchorage, Alaska 99510

From: Norman R. Little  
 Skipper  
 F/V Trident

RE: Limited Access to Black Cod

ACTION	ROUTE TO	INITIAL
	Exec. Dir.	J
	Deputy Dir.	
	Admin. Off.	
cc:cm	Exec. Sec.	RL
	Staff Asst. 1	
	Staff Asst. 2	
	Staff Asst. 3	
	Director's Sec'y	
	Sec'y/Driver	
	Sec'y/Typist	

I wish the council to know that I favor limited access to the Alaska sablefish fishery. I would like to see this fishery protected from reaching the chaotic state of the halibut management program. It is my opinion that the following points would best serve the industry:

1. The actual fisherman who has landed sablefish in his name, rather than the vessel or owner, should be permitted to continue to fish. He has the greatest economic dependence because his livelihood depends on direct participation.
2. Individual share quotas with a 2% of TAC cap would be of best economic advantage to the fishermen and processors. Thus allowing the catch to be distributed over a long season preserving product flow and quality.
3. Recent participation should be the criteria by which shares are issued. However, due to the influx of speculators in 1987, I believe the average catch of 1985 and 1986 should be used to establish share quotas.
4. Permits should be transferable, and the holder should be on board. This would be easy to enforce and promote continued participation by fishermen of small communities rather than speculators and investors.

Finally, in my own interest, I would like to say that I have been an Alaskan fisherman for 18 years, and have leased the F/V Trident for the past 6 years. I fished black cod when the only other longliners I saw on the grounds were Japanese. I own all the longline gear and most of the electronic's on the boat, which amount to a considerable investment. I hope to be able to buy the Trident this year, after years of saving. So should a permit be given to the owner or vessel, it would be a great economic hardship for me and my family.

Very truly yours,

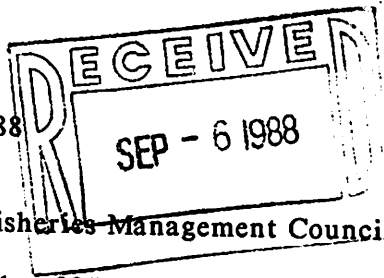
*Norman R. Little*

Norman R. Little  
 Skipper, F/V Trident  
 P.O. Box 1802  
 Cordova, Alaska 99574

*MR. LITTLE requested that this letter be resubmitted to Council in lieu of additional comments.  
 4/19/88 RET*



September 2, 1988



North Pacific Fisheries Management Council  
P.O. Box 103136  
Anchorage, Alaska 99510

**Re: The Black Cod Fishery**

Dear Sirs:

This letter will provide you with my written comments on the Council's management alternatives for Black Cod, as well as comments on recent ideas being circulated concerning by-catches for Grey Cod and Rock Fish fisheries.

#### **My Personal Involvement**

I am a fifteen year Alaska resident and have been fishing commercially for the past thirteen years, all in the Southeast/Yakutat area. I currently own a power troll permit, which I fish, and I am also active in the Halibut and Black Cod fisheries.

#### **Black Cod**

**The Problem of Limited Resources:** As I understand the situation, the Council is now struggling with the problem of allocating limited stocks of Black Cod among a sizable fleet willing to catch those stocks. Over the past several years the Council has assigned various quotas and opening lengths in its efforts to obtain an equitable distribution of the resource among the Black Cod fleet, while maintaining a viable fishery.

**Council Approach to Increase Quota:** I recently read a statement by a Council biologist in one of the fishing publications, in which the gentleman argued that the Black Cod management problems were perhaps solved, as evidenced by a 40% quota increase implemented in the Southeast/Yakutat District, as this quota increase had lengthened the season out to thirty days.

**Problems with the Council Approach:** The problem with this reasoning is that it pays no attention to reality. I mean to say that, even though the quota was increased 40% and the opening lengthened to thirty days, there were not enough Black Cod available to make the fishery economically viable for the entire fleet. Consequently the majority of the fleet fished only the first one-third of the opening, when 70%-80% of the catch was landed. The quota itself was never even reached.

Now even though the Council increased the quota, the Black Cod fishing was no better than it has been historically, and, for most boats in Southeast/Yakutat, the fishing was worse than it has been.

I am reminded of the recent experience in the Bering Sea. In the Bering Sea King Crab fishery the fleet enjoyed several years of excellent harvests obtained under high quotas and lengthy openings. But as you may know these good years were followed by a complete collapse of the king crab stocks. This collapse was of course followed by an end to king crab fishing for several years, and the Bering Sea is only now beginning to stage a comeback.

Please let's avoid these types of management blunders in the Southeast/Yakutat Black Cod fishery.

The problem with the Southeast/Yakutat Black Cod fishery is that the fleet is increasing in size and efficiency, and the Council should not use public relations gimmicks as management tools.

**Recommendations to the Council on Black Cod:** I would like to go record as supporting a license limitation system (limited entry) for the fishery, preferably followed by an Individually Transferable Quota (ITQ) system.

For the average fisherman it is far preferable to make a one-time investment of a known amount of money to fish in a stable fishery, than to be forced re-invest unknown amounts of money each year to fish in an unstable fishery.

#### **Ideas About By-Catches for Grey Cod and Rock Fish Fishermen**

**Access to Black Cod and Halibut:** Finally I would like to make a comment of the idea currently being circulated regarding allowing Grey Cod and Rock Fish fishermen to make an incidental catch of a percentage of the Black Cod (4%) and Halibut quotas.

**Problems with the Idea:** This idea defies logic. First, why should anyone have more of a right to the Black Cod and Halibut quotas than anyone else?

Second, this idea puts the cart before the horse, as it were, because the Grey Cod and Rock Fish fisheries are at best only marginally profitable, while the Black Cod and Halibut fisheries are economically sound. In other words, if these are viable fisheries, why do they need the Black Cod and Halibut by-catch? I would think a more realistic approach would be to allow Grey Cod and Rock fish as a by-catch of the Black Cod and Halibut fisheries.

Finally we should remember that Grey Cod and Rock Fish fishermen are predominantly newcomers to the fishery. The people with the long term experience are in the Black Cod and Halibut fishery. My understanding is that the Grey Cod and Rock Fish fishermen are purposely setting on Black Cod to assure their 4% by-catch.

**North Pacific Fisheries Management Council**  
**September 2, 1988**  
**Page 3**

**Recommendation for Better Management:** In sum, if the Council creates viable, twelve month Black Cod and Halibut fisheries, the fleet will be able to harvest the majority of any quota of Grey Cod or Rock Fish.

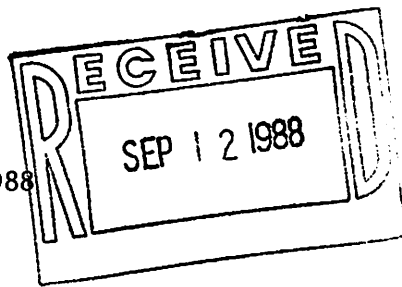
Sincerely,



Calvin A. Robinson, Owner  
F.V. Champlain  
P.O. Box 21232  
Juneau, Alaska 99802



2300 West Commodore Way • Seattle, WA 98199 USA  
Phone (206) 285-3200 • Telex 160587 MARCO UT



September 6, 1988

James O. Campbell, Chairman  
North Pacific Fishery Management Council  
PO Box 103136  
Anchorage, AK 99510

Dear Mr. Chairman:

We have read the draft of Sablefish Management in the Gulf of Alaska and the Bering Sea/Aleutian Islands, and although we are still studying its contents we are deeply concerned with some of its proposals.

We believe that some form of limited entry is required for the long-term effective utilization of the sablefish resource. However, the cut-off dates proposed in conjunction with the various limited entry alternatives are totally unacceptable.

We believe that the goal of the Magnuson Act was not only the Americanization of the ground fish resource, but the effective, efficient Americanization of the resource where the highest quality product is caught and processed in the safest manner possible.

We have already invested over \$3 million towards the achievement of this goal in one recently active freezer/longliner, the F/V Deep Pacific, and we are currently planning on a second similar investment. Others have also made, or are planning to make, the same serious, long-term commitment to the improvement of the fishery. To not include these recent entries and current serious projects in the allocation scheme will severely penalize those doing the most to develop and improve the fishery. As it is often generalized - to not go forward is to go backward.

We urge you not to reverse the development that has already occurred but to help direct it as it moves forward. We hope that we can be of some assistance in helping you and the Council toward that objective.

Sincerely,

Peter G. Schmidt  
President

MLZ/JVA

NPFMC/ZUBK03

David Shrader  
412 Willow Street  
Kodiak, Alaska 99615  
8/23/88

RECEIVED  
AUG 29 1988

North Pacific Fishery Management Council  
PO Box 103136  
Anchorage, Alaska 99510

Dear Council Members,

I have received a copy of the draft Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis (EA/RIR/IRFA) for the draft sablefish longline management alternatives.

I am interested in studying this document and submitting my comments during the public review period for your consideration before the September Council meeting. However, I have been very busy all summer fishing for dungeness crab here in the Kodiak area, expect to be so engaged through and well beyond the September 20 closing date for the review period, and will find it very difficult to find the time to study this complex document and assemble the kind of comment package that I would like to, and it certainly deserves.

I do have some general concerns on this issue I would like the Council to consider that I will briefly relate now, and if I am able to study this document in greater detail in time, I do intend to submit more in-depth comment.

First of all, I feel that the timing of the release of this draft EA/RIR/IRFA document and the time frame selected for a public review period is very unfortunate. As in my own case, a very large number of fishermen who are interested and will be affected by this decision and related considerations have been necessarily preoccupied making a living in any of several fisheries all summer, and do not have the free time necessary to even be aware of this document, let alone study it and assemble comments during this time of year. This situation should be obvious to the Council, and if maximum public understanding and awareness of the issue and solicitation of maximum coherent input from interested fishermen were the objects of this procedure, then a more convenient and effective time-frame could have easily been utilized - sometime in October or November, for example. Because of the permanent and irreversible nature of the application of any limited access approach in a fishery, the precedental nature of this decision, and the widespread economic impacts beyond the scope of the sablefish longline fishery, this document, with its many alternatives and various facets to each alternative, deserves extensive scrutiny and consideration. Its release for public review at this time of year almost assures that it won't get it. I hope you will consider this situation, and provide for another, more timely, review period before making any decision on this issue.

Regarding the question of adopting a limited-access plan for the longline sablefish fishery, I strongly support a continued open-access approach, and feel that the permanent, irreversible nature and economic side-effects of any access-limitation system can only exacerbate conditions in the fishing industry and reduce the opportunities necessary for the conduct of a successful fishing business, while transferring the access to and benefits from the fishery into the hands of a few with the greatest financial resources. I have included a copy of my letter to the Council dated November 29, 1987 to reiterate some

of my general concerns on this point. My views have not changed. Please consider this letter as part of this "comment package".

Although I haven't had time to consider the specific alternative proposals and related discussion assembled in the draft EA/RIR/IRFA, I do note that some of the alternatives involve a "mixed" or "combination" approach, either combining open-access with IFQs, or IFQs with license limitation, etc. If reducing "fishing pressures" is the object of changing the sablefish management approach none of these alternatives should be considered. Reducing the amount of resource available to fishermen of any group through any means will only inhibit their ability to be economically successful at it - the end result would be the same as a drop in the abundance of the resource itself, not necessarily accompanied by the supply/demand price increase that may otherwise follow, as fish caught by the "other guys" will still be available to the markets. In the case of the remaining open-access fishery, this artificial-quota-reduction will only exacerbate any "fishing pressure" conditions, and will more than likely create new ones.

Regarding the multi-species longline fishery alternative proposal, I did have occasion to write a letter to the editor of the Alaska Fisherman's Journal addressing this concept several months ago, and have included a copy of that letter here for your consideration, again as a part of this "comment package".

I regret to have to refer you to my previously-written material for you to glean my thoughts from, but I frankly just don't have time right now to re-digest and repackage their contents. I hope you will bear with me, and I appreciate your patience and interest.

I will do my best to submit a more in-depth and specific comment package for your consideration, but either way, here's my bottom line: I strongly support a continued open-access management approach for the longline sablefish fishery.

Thank you for considering my thoughts.

Sincerely,



David Shrader

CC: C. William Verity, Sec. of Commerce  
Rep. Don Young

November 29, 1987

North Pacific Fishery Management Council  
PO Box 103136  
Anchorage, Alaska 99510

Dear Council Members,

I am very concerned about the direction you are taking regarding the management and allocation of several Alaskan fishery resources.

Specifically, I am aware that it is the Council's intention to implement a limited access plan for the Alaskan sablefish fishery, and that there is also consideration being given to access limitation for the halibut, groundfish, and crab fisheries.

I very strongly support the current open-access management approach for all fisheries for the following reasons:

Open access fisheries provide jobs and economic benefit to the maximum number of vessels, fishermen, and fishing communities dependent on the fishing industry.

Open access management provides individual fishing vessels the opportunity to explore various fishery options to maintain a stable overall fishing business, as resource and market conditions fluctuate. This has been clearly demonstrated by the Kodiak fishing fleet, easily the most diverse and economically stable fleet in Alaska, which has been able to maintain general economic success through high and low conditions in several major fisheries.

Open access management provides individual vessels the flexibility and economic support necessary to develop new fisheries. Markets for developing fisheries may be especially weak during early formative periods, and fishermen need the economic support available from a wide spectrum of productive fisheries to maintain viability and interest in the newer, marginal fishery (as the established king crab fishery ushered in the tanner crab fishery).

Open access management provides for effective resource conservation. Fishery resource abundance fluctuates naturally regardless of fishing pressure, and conservation measures must be employed under ANY allocation regime. The resources in the fisheries under consideration for limited access by the Council are all currently enjoying high and/or increasing abundance levels. There is no incidence of a fishery resource failure which occurred as a result of management's inability to react to fishing effort levels in an open access fishery.

Limiting access to fisheries will have dramatic negative impacts throughout the fishing industry and fishing communities. I am opposed to any limited access system for any Alaskan fishery for the following reasons, to list a very few:

Access limitation is an allocative measure and does not facilitate or enhance fishery resource conservation efforts. The need for, and the effectiveness of, conservation measures does not vary with different allocation regimes.

Any limited access plan will require the establishment of an "optimum fishing effort level" for that fishery. Under open access management fishing effort levels are free to vary in concert with natural fluctuations in resource abundance and market con-

ditions among fisheries. Once a limited access plan is established, the "optimum" effort level becomes, in effect, the "guaranteed minimum effort level", regardless of any change in conditions in the fishery, while leaving individual vessels free to increase their own fishing efficiency---resulting in NO cap on maximum fleet effort.

Limiting access in some fisheries will artificially increase fishing effort in the remaining open-access fisheries, as displaced fishermen seek to maintain their livelihoods. To isolate one fishery with a limited access plan without recognizing this problem of "displaced effort" is ridiculous management.

Limited access systems provide for the concentration of the economic benefits from a fishery to a very small number of interests. As fishery conditions improve, economic benefits would, under open access, be realized by maximum numbers of fishermen and related businesses. Under limited access, increased benefits will be realized by only a privileged few.

Limited access systems are irreversible. Fishery rights will instantly acquire great values, and over time become ensnared in the financial quagmire of encumbrances, collateral, loans, leases, etc. that will make returning to open access impossible.

I have much more to say with regard to this issue, but I recognize my time and space limits. In general, I believe it's best to leave effort-control decisions to the individual fisherman as part of the natural conduct of his business. Management-level limited entry discussion will ALWAYS stimulate fishing effort in a fishery, regardless of established "cutoff dates", etc (they CAN be changed...).

This ceaseless, greedy, self-serving resource-grab exercise by limited entry proponents is tiring, to say the least, after all these years, and certainly can NOT be said to be in the interest of the fishing industry by any stretch of the imagination. The controversy that necessarily accompanies discussion of limited entry has proven to be divisive and counterproductive.

There exists in our current open-access management regime, equal opportunity for all fishermen to all fishery resources; there exists provision for the implementation of any resource conservation mechanisms that mankind can ever hope to effectively employ for the benefit of creatures that live in the ocean; and there currently exists mechanisms whereby the economic benefits derived from our fishery resources can be equitably distributed and realized by a maximum number of people. I respectfully urge the Council: DON'T mess it up!

Sincerely,  
*David Shrader*

David Shrader  
412 Willow Street  
Kodiak, Alaska 99615



January 4, 1988

Editor

Alaska Fisherman's Journal  
1115 NW 46th St.  
Seattle, Washington 98107

Editor,

I've been thinking for awhile now about the multi-species longline fishery management plan suggested by Nick Delaney which appeared in the December 1987 issue of the Alaska Fisherman's Journal. The focus of the plan is the allocation of 25% of the total harvest quota for halibut as a by-catch quota for other longline groundfish fisheries, in an attempt "to promote a rational approach to the management of all commercially valuable longline-caught species...". It's an interesting, thought-provoking plan, articulately stated, and certainly merits some consideration. Some questions, comments, and concerns that occur to me are:

Suppose the plan as described is implemented, using the 25% quota figure, and the 20% per load ratio (recognizing these are arbitrary figures). It seems to me that most fishermen, in attempting to do the best business they can, would not consider a trip a complete success unless they reached their "20% goal"--- then it would be a race - as are all fisheries managed by quotas - to get as many "20% halibut" loads as they could before the by-catch quota was caught. In effect, another directed fishery. Considering the likelihood of increased effort in this type of fishery due to the greater profitability brought by the retention of halibut for sale, it may not be too long before the by-catch quota is reached. Using the area 3A example numbers listed in the article, 25% of a 31 million pound quota is 7.75 million pounds. As has been demonstrated, it doesn't take very long to catch 7.75 million pounds of halibut in area 3A. However, in order to deliver that 7.75 million pounds of halibut, the markets must also absorb 31 million pounds (14,000 MT) of other, more underutilized groundfish species, such as Pacific cod, sablefish, rockfish, turbot, and others. Seems like it may slow things down some maybe, but who knows? What happens when the 25% halibut by-catch quota is caught? After reaching this 25% level, are we satisfied? There's still more halibut out there to catch, after all...

How will fishermen juggle their catch to attain the 20% per load goal? If fishing results in too many halibut, will some have to be wasted? If they are confiscated, will they be counted against the by-catch quota, or the remainder of the directed halibut fishery quota? If too much of the lesser-valued species are caught, will they be high-graded overboard? What quota should they be taken off of? Would there be a greater possibility for the development of halibut black-market opportunities, with halibut "legally" available for a longer period of time than they are during directed fishing? It seems like the impacts on conservation and enforcement efforts may need greater, in-depth study here...

The concerns and rationale involved in determining which vessels and gear types would qualify for (deserve) the benefit of this special halibut bycatch allocation provide fertile ground for further considerations. I couldn't agree more with the concept presented that catcher-processors should not be allowed in the halibut fishery. My own feeling is that catcher-processors present the greatest potential threat to the effective implementation of conservation measures for all fisheries, and I'd just as soon see 'em all politely escorted from the business on that grounds alone. Then there's the threat they pose to communities

with fishing-based economies... but here I'm getting off the track...

The arguments presented in justification of the benefits of continuing the longline-gear-only-harvest of halibut seem fair enough to me. Provision for halibut by-catch retention and sale by other gear types most likely would result in a real hairball for managers and enforcement. This is another concern vital to effective conservation of the resource. However, the rationale presented to justify this special 25% (or whatever) by-catch allocation to "primary" longline fishermen in the first place seems questionable to me.

The basic tenet on which this by-catch allocation would be based seems to lie in the definition of some distinct group of fishermen whose business needs in relation to the halibut fishery surpass those of other fishermen. This is puzzling. Support for this distinction as "primary longliners" is clearly spelled out in the italicized statement: "Not a single trawler nor pot fisher has included the necessity of a dollar's worth of halibut unto the success of that vessel's business plan." Well now, whoa! Hold on here a second...

With the demise of the king crab, tanner crab, and shrimp fisheries in recent years, the halibut fishery has become a vital and integral component in the business plans of a very large number of highly-diversified fishing vessels. This is especially the case in the Kodiak fleet, one of the most diverse and successful fleets in the country. Without this halibut fishery option, many boat and insurance payments simply wouldn't have been made in recent years. The success of a diversified vessel's business plans may not only include the necessity of a dollar's worth of halibut, but also a dollar or two from a combination of: the herring and/or salmon fisheries (either fishing or tendering), the dungeness crab fishery, Bering Sea (or other) red, blue, or brown king crab, or tanner crab, or the sablefish longline fishery, or various groundfish trawl fisheries, etc. As we know, resource and market conditions will vary regardless of management efforts, and a wide range of viable options and the flexibility to utilize them are requisites to a successful fishing business for many these days. Several Kodiak vessels who have long histories of involvement in various fisheries are even now throwing off shelter-decks, tubs, etc, in favor of crab blocks and pot launchers in anticipation of the upcoming Kodiak tanner crab season. What if 25% of the tanner crab quota had already been caught by a fleet of "primarily crab" fishing vessels?

It seems to me that the decisions each individual vessel owner makes regarding which fisheries to plan his business on should not include provisions for special allocations, but on conditions as they exist in the fisheries at the time. For example, maybe it's just plain better business to catch Pacific cod with a pot or in a net at this time than on a hook. Maybe not...

The point I'm coming to here is that while the businesses of those who consider themselves "primarily longliners", and those willing to settle for the more generic distinction of "diversified fisherman" can all benefit equally from a fishery allocated as a 100%-directed-harvest-(status quo)-fishery, the proposed by-catch plan would seriously reduce the economic benefit potential for the more highly diversified fishermen who have come to depend on the halibut fishery as an integral part of their overall business plans. It seems likely that the reduction by 25% of the harvest quota from the directed halibut fishery would result in an even more chaotic, difficult-to-manage directed fishery (assuming we really are to be left with a directed fishery at all), with even higher pressures, fewer and shorter openings, more competition on the ground, probably trip limits, and who knows what else. In other words, it seems likely to me that the costs of this plan may outweigh any real benefits, if that's a worthwhile consideration to managers these days...

Regardless of my obvious conclusion that I'd rather not support this particular plan, I do recognize that there are certain conditions that exist in the Alaskan halibut fishery that make the overall fishery somewhat less than ideal in some ways---but I also recognize that management can only provide relief to a certain degree, and there is a definite potential for REALLY screwing things up for the long term.

As Mr. Delaney pointed out, there are several less-than-desireable alternatives that managers have considered for the halibut fishery that would most likely have disastrous results, such as trip limits, and limited access systems like share-quota, etc. Hopefully, ~~with~~ reason, patience, and a view for the long term impacts will prevail, and such radical, short-sighted approaches will fall by the wayside and be forgotten.

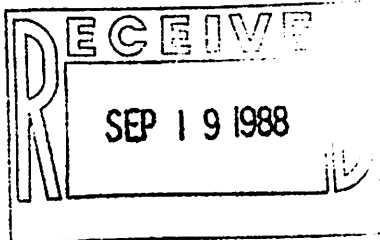
In the meantime, it seems to me that the root cause of the high effort level in the halibut fishery is that there's too many, and increasing amounts, of halibut. Higher exploitation rates should be adopted to take advantage of this abundance (which can't be maintained, anyway), and provide more of those fish to the fishery while they're here. Reduction of halibut abundance would directly lower the predation on the distressed shellfish resources, perhaps stimulating a revival of those fisheries, and as more crab fishing options develop for fishermen and the abundance of halibut is reduced, then the fishing effort level should go down in the halibut fishery. Maybe the price of Pacific cod will even go up somehow, for use as hanging bait, if nothing else. Sounds good to me, anyhow---I don't think you can "bank" halibut stocks any better than you can "bank" crab or shrimp stocks.

Further, the implementation of tank inspections prior to directed halibut openings, and an area check-in/check-out post-opening system would probably help to discourage those who feel compelled to cheat due to some bizarre inadequacies in their personality makeups, or whatever, and may enhance conservation and enforcement some.

I'm sure there are still more ideas around of ways to improve conditions in the halibut fishery and the fishing industry in general, and more will be developed. That's good - that's how problems can eventually get solved. It's important to recognize the problems, what can be done, what needs to be done, what's practical, what's impractical, and exercise prudence (whoever she is) and caution to ensure that whatever IS ultimately done doesn't make a bigger mess than we had in the first place.

Sincerely,

*David Shrader*  
David Shrader  
412 Willow Street  
Kodiak, Alaska 99615  
907-486-5819



P. O. Box 825  
Port Townsend, WA 98368

September 15, 1988

North Pacific Fishery Management Council  
P. O. Box 103136  
Anchorage, AK 99510

Subj: Comments regarding draft EA/RIR/IRFA, GOA Sablefish

Gentlemen:

Upon reviewing the above mentioned draft EA/RIR/IRFA, I strongly recommend that you adopt Alternative 2, Option 2, a multi-species longline fishery for Sablefish in the Gulf of Alaska, where participating vessels would choose on a yearly basis, whether to enter the directed or by-catch fishery. Additionally, I believe that a by-catch allotment of 50% vs. 25% of the TAC would be more appropriate in order to encourage development of other fisheries. This would help even out the economic impact and reduce the financial risk of prospecting in these other fisheries, i.e. pacific cod. This alternative, combined with trip limits on Sablefish and Halibut, possibly a little higher than 10% each, would enable a vessel to gear up for and pursue alternative fisheries and still survive financially. Also, excess effort would be discouraged by the requirement for a majority of alternate species content in the hold.

As owner and operator of a fishing vessel, I am truly concerned with the devastating effect the trawl fishery is having on sablefish stocks. I have personally seen, and have heard from crewmembers on trawlers, about the dumping overboard of immature Sablefish in order to remain within catch limits. This is usually combined with the high grading of retained Sablefish in order to qualify for higher revenues at the dock.

The disproportionate selectivity of trawls toward Sablefish populating the early year classes (4-8 yrs) has been extensively documented (NWAFC Processed Report 86-06; MFR Paper 1005; Bulletin 22, March 1985, Far Seas Fisheries Research Laboratory-Sasaki). I strongly recommend that the directed fishery by trawlers for Sablefish be eliminated, and their bycatch be reduced to the minimum practical level. I don't believe that any serious effort to manage the Sablefish fishery will succeed unless this issue is addressed.

Sincerely,

A handwritten signature in cursive script that reads "David D. Tarr". The signature is written in dark ink and is positioned above the printed name.

David D. Tarr

Report of Meeting on September 16, 1988  
Juneau, Alaska  
Subject - Alternative Sablefish Management Regimes:  
Administrative and Enforcement Considerations

Participants: Jim Brooks, Acting Regional Director, NMFS; Craig Hammond, NMFS-Enforcement; Craig O'Connor, NOAA-GC, Alaska; Dale Evans, NMFS-AKR; Jay Ginter, NMFS-AKR; Pat Peacock, NMFS-AKR; Bruce Twomley, CFEC; Kurt Schelle, CFEC; Roger Kolden, CFEC; Ben Muse, CFEC; Clarence Pautzke, Executive Director, NPFMC; and Ron Miller, NPFMC.

The consensus from the meeting was that all the alternatives presented in the August 10, 1988 draft EA/RIR/IRFA on sablefish management are legally defensible and, given adequate funding, could be implemented. Further, the meeting participants noted that it would be very important for the Council to decide which management alternative it wished to adopt and then clearly establish an implementation strategy. The earliest a program could be implemented, considering NMFS budget and personnel needs, would be January 1, 1990.

Should the Council adopt one of the limited entry alternatives, it would be advisable to consider adopting also either a cut-off date or a moratorium that would be "tied" to a permanent limited entry system. The purpose of a cut-off date or a moratorium would be to give the Council and NOAA/NMFS time to put an administrative structure in place and to process any administrative appeals before the permanent regime started. A cut-off date or moratorium could be implemented as follows:

1. Cut-off Date - The Council would adopt regulations that specify the type of limited entry system it was implementing but set the date the program would be begin \_\_\_\_ years in the future. The regulations would also state that any participation between the closing date of the eligibility period and the start-up date for the limited entry program would not accrue any credit toward a limited entry entitlement.
2. Moratorium - The Council would adopt a limited entry regime, specify that it is to begin \_\_\_\_ years in the future, but restrict participation in the fishery between the date of adoption and the effective date to those who had harvested prior to the date of adoption. Unlike the cut-off date approach, a moratorium would prevent new entry in the fishery during the interim between adoption and implementation of a permanent limited entry system.

After reviewing the projected administrative costs associated with implementing limited entry described in Appendix I to the draft EA/RIR/IRFA, the meeting participants concluded that the projections appear to be generally accurate; however, Craig O'Connor noted that adoption of any of the limited entry alternatives would require an additional attorney full-time in his

office during the first year of the program and then part-time thereafter. The costs for this position are \$65,000 - \$75,000 for the first year and \$30,000 - \$35,000 annually thereafter.

Enforcement of the various alternatives was discussed in detail. The consensus was that the multispecies alternative would exacerbate IPHC's management problems since it would require special allocations of part of the halibut TAC to the multispecies fishery thereby reducing the TAC available to the regular halibut fishery. The multispecies alternative would also require constant dockside enforcement and a constant "paper chase" to ensure sablefish TACs weren't exceeded.

Under IFQs, there would not be as much direct enforcement effort on the grounds as there is today. Most of the enforcement would be of an accounting nature and could take place after the season. However, if enforcement is to deter violations, it must be accompanied by substantial penalties. IFQ enforcement would require a highly efficient tracking system and the system as described in the draft document provides for two fish ticket protocols: state and federal. To be efficient these systems should be combined. Though inseason enforcement would decrease, a presence would still be needed to ensure that fishing vessels are reporting catch from the correct area and properly documenting their transactions.

The license limitation alternative would require increased dockside enforcement to ensure a vessel was licensed to fish and also that the license held by the vessel was the appropriate type for the vessel length. There was concern expressed that vessel length would need to be well defined in the regulations to ease enforcement problems.

Subcontracting part of the implementation of a sablefish limited entry program with the Commercial Fisheries Entry Commission was also discussed. Potential problems were identified regarding confidentiality of fish ticket data and sharing that data between the State and NMFS. Craig O'Connor is to research these questions and report his findings. Dependent on the Council's action at the September 28-30, 1988 meeting, the group will meet again in the near future to further pursue questions raised at the first meeting.

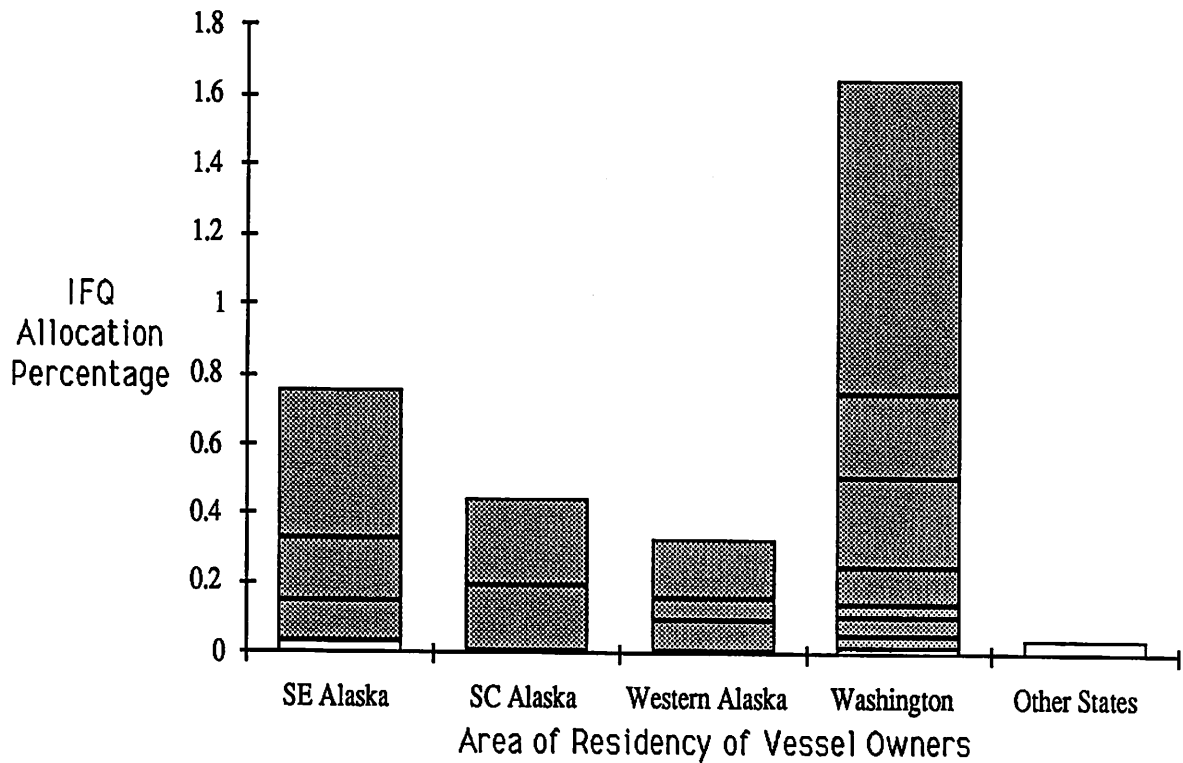
### Distribution of IFQ Allocations

The following figures depict the distribution of IFQ allocations by area of residency for each management area. Separate sets of figures are presented for vessel owners and permit holders. The data used to derive these allocation percentages were the same data used in the previous analyses in Chapter 6 of the Sablefish EA/RIR/IRFA.

In the figures which follow, each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals presented below the figures). The shaded areas in the two Southeast Outside/East Yakutat Figures each represent 10 individuals. There are five individuals who qualify for allocations greater than the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

As an example, consider allocations of IFQs to vessel owners who fished in the Bering Sea (Figure 1). There are 20 qualified owners from Southeast Alaska. Each qualifies for over 0.0319% of the total allocation. Five would receive allocations between 0.1512% and 0.0319% of the total, five between 0.3316% and 0.1512%, five between 0.7589% and 0.3316%, and five over 0.7589%. At this time, it is not possible to determine the upper limit of allocations for any group by area of residency or all vessel owners irrespective of residency. However, of all the owners qualifying in the Bering Sea management area, five would each qualify for 2.6542% or more of the total allocation.

Figure 1. Distribution of IFQs to Vessel Owners, Bering Sea



- Each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

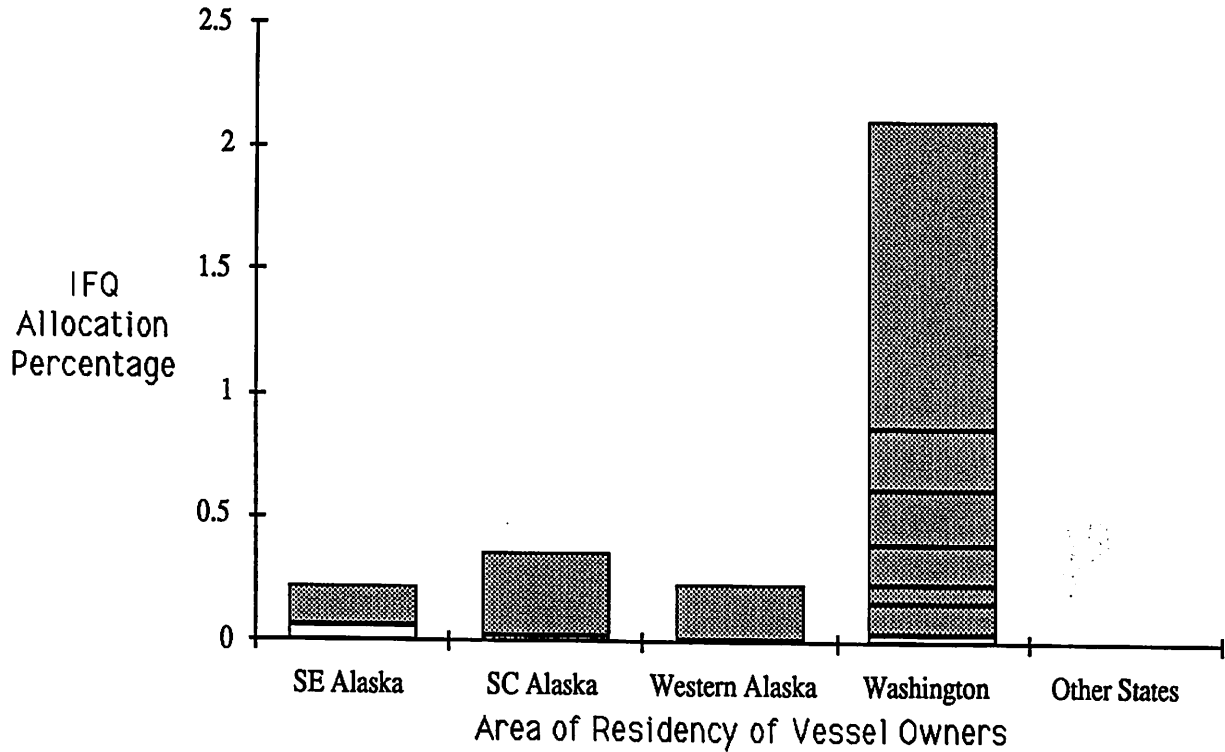
Qualifying vessel owners by area of residency

Southeast Alaska	20
Southcentral Alaska	16
Western Alaska	24
Washington	43
Other states	7

Minimum allocation of top five qualifiers irrespective of residency: 2.0806% each



Figure 2. Distribution of IFQs to Vessel Owners, Aleutian Islands



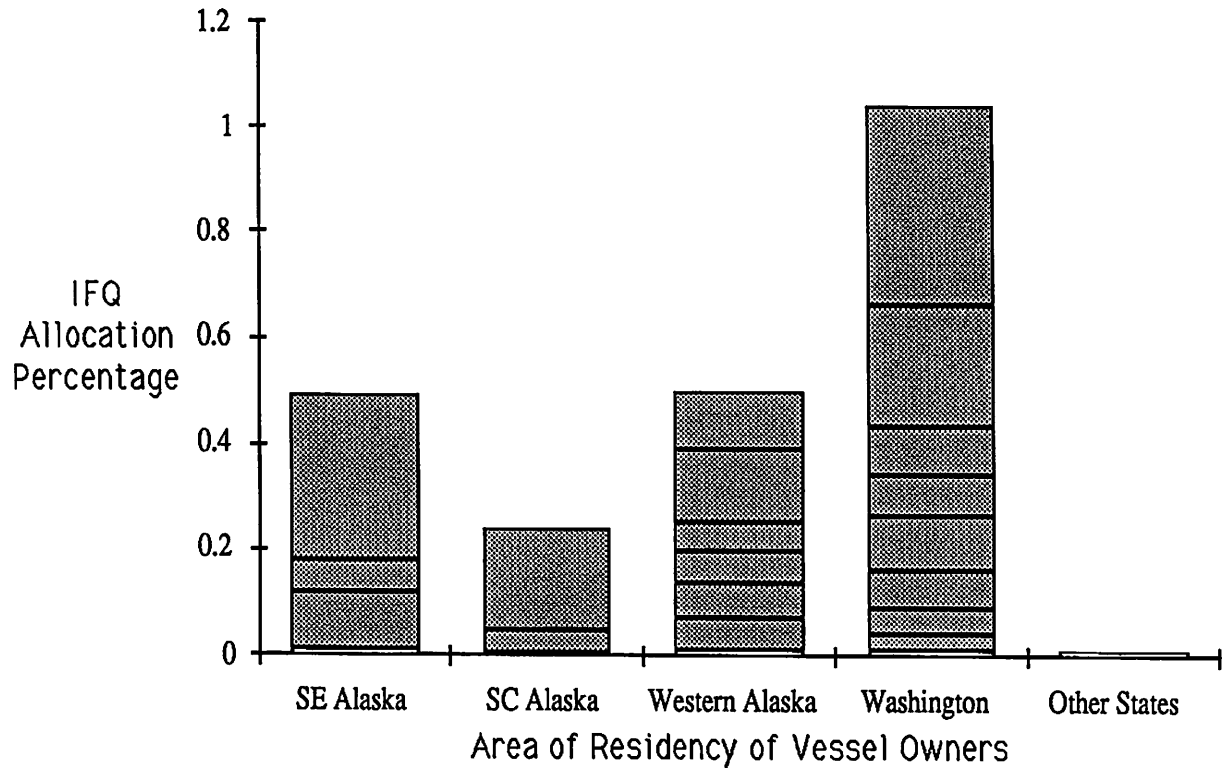
Each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

Qualifying vessel owners by area of residency

Southeast Alaska	11
Southcentral Alaska	11
Western Alaska	12
Washington	35
Other states	3

Minimum allocation of top five qualifiers irrespective of residency: 2.6542% each

Figure 3. Distribution of IFQs to Vessel Owners, Western Gulf of Alaska



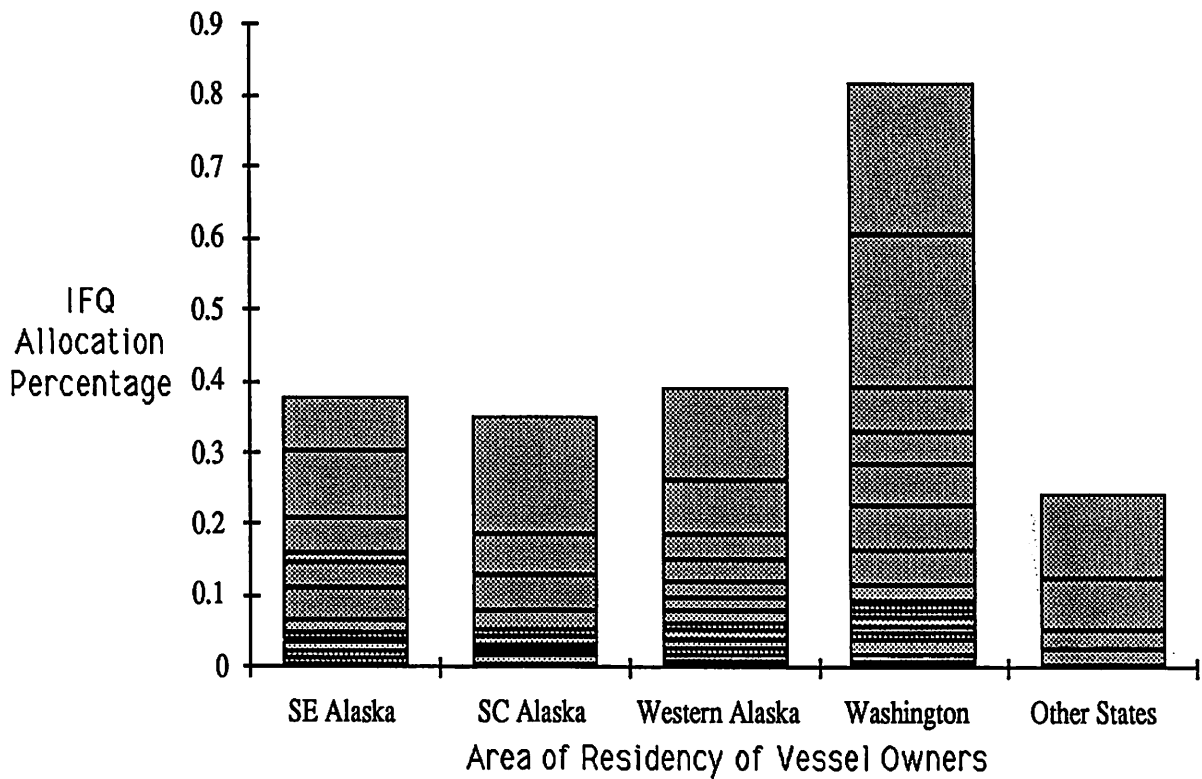
Each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

Qualifying vessel owners by area of residency

Southeast Alaska	20
Southcentral Alaska	16
Western Alaska	37
Washington	45
Other states	9

Minimum allocation of top five qualifiers irrespective of residency: 1.5648% each

Figure 4. Distribution of IFQs to Vessel Owners, Central Gulf of Alaska



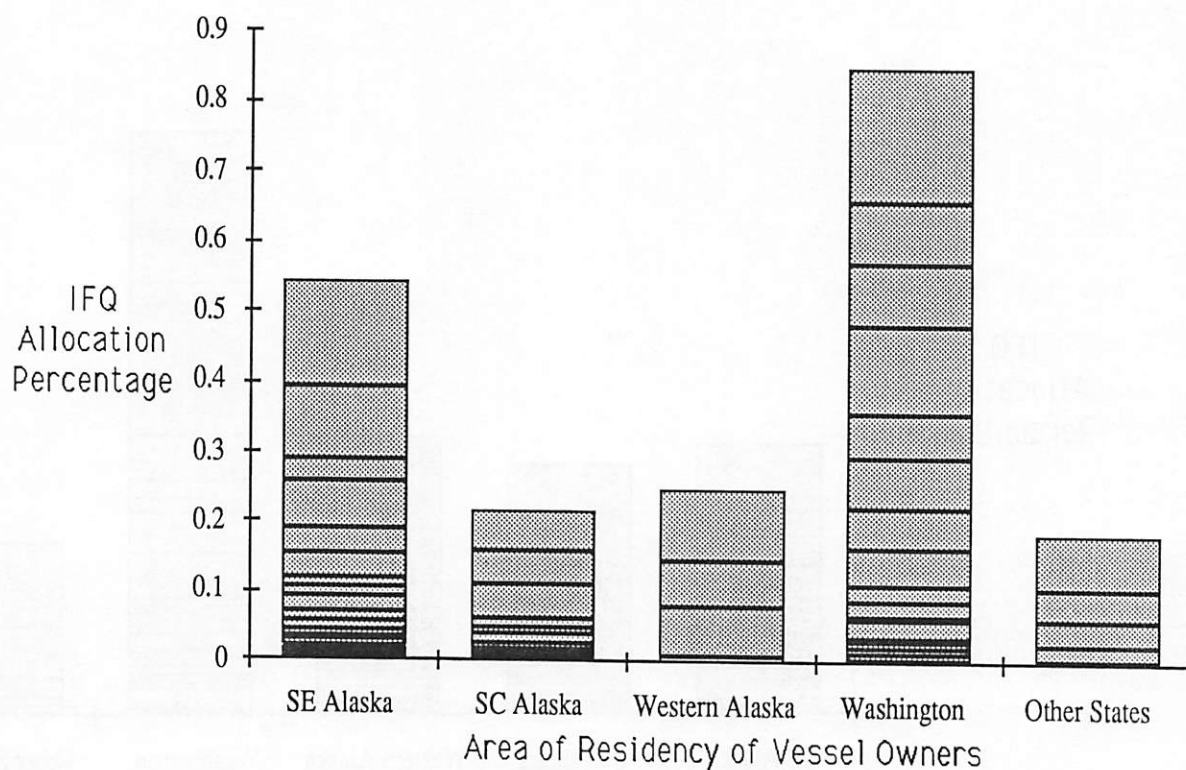
Each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

Qualifying vessel owners by area of residency

Southeast Alaska	72
Southcentral Alaska	78
Western Alaska	75
Washington	97
Other states	27

Minimum allocation of top five qualifiers irrespective of residency: 0.9725% each

Figure 5. Distribution of IFQs to Vessel Owners, West Yakutat



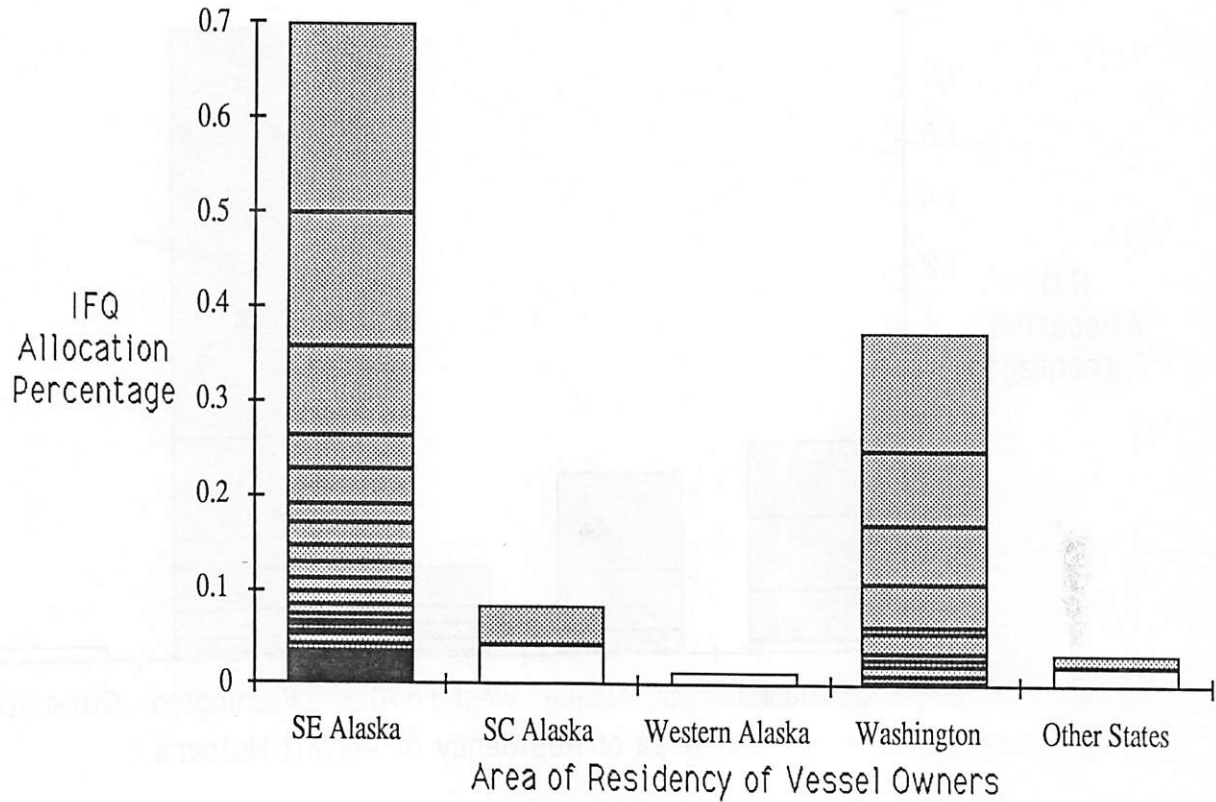
Each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

Qualifying vessel owners by area of residency

Southeast Alaska	95
Southcentral Alaska	63
Western Alaska	23
Washington	87
Other states	26

Minimum allocation of top five qualifiers irrespective of residency: 0.9463% each

Figure 6. Distribution of IFQs to Vessel Owners, Southeast Outside/East Yakutat



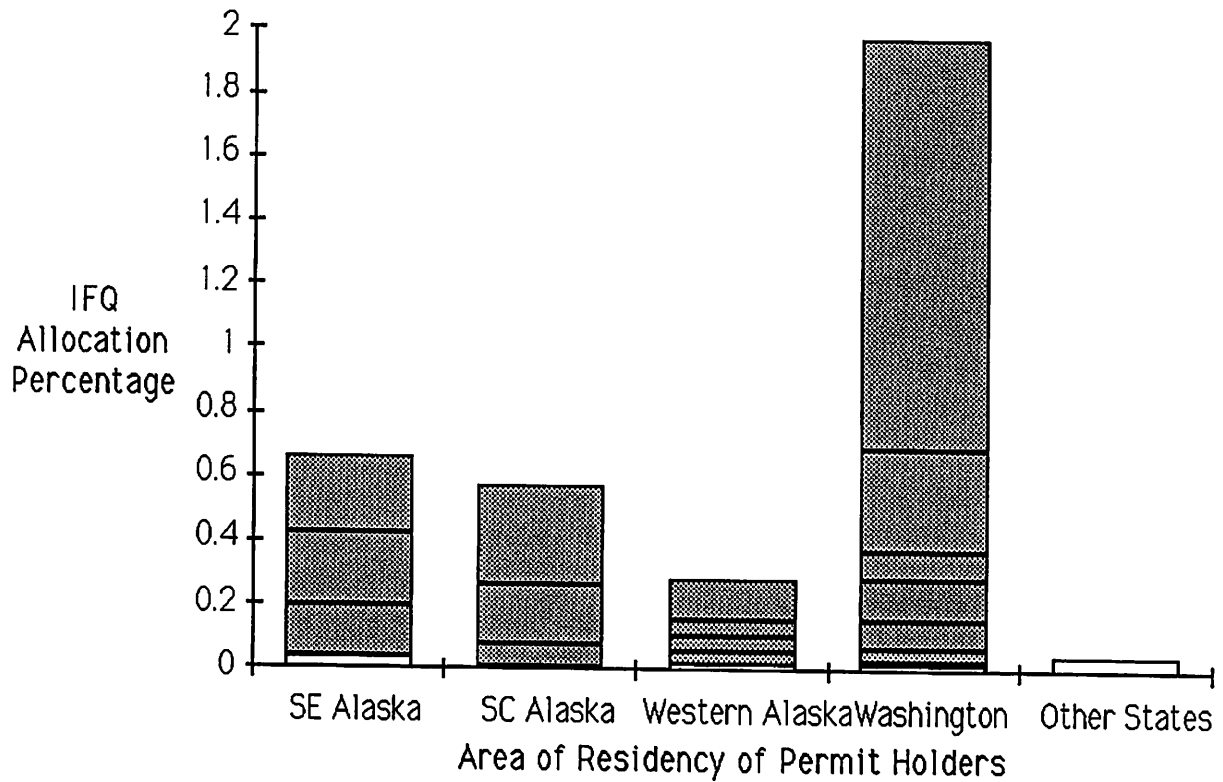
Each shaded area represents the allocation percentage for ten individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

Qualifying vessel owners by area of residency

Southeast Alaska	303
Southcentral Alaska	15
Western Alaska	6
Washington	107
Other states	15

Minimum allocation of top five qualifiers irrespective of residency: 0.7251% each

Figure 7. Distribution of IFQs to Permit Holders, Bering Sea



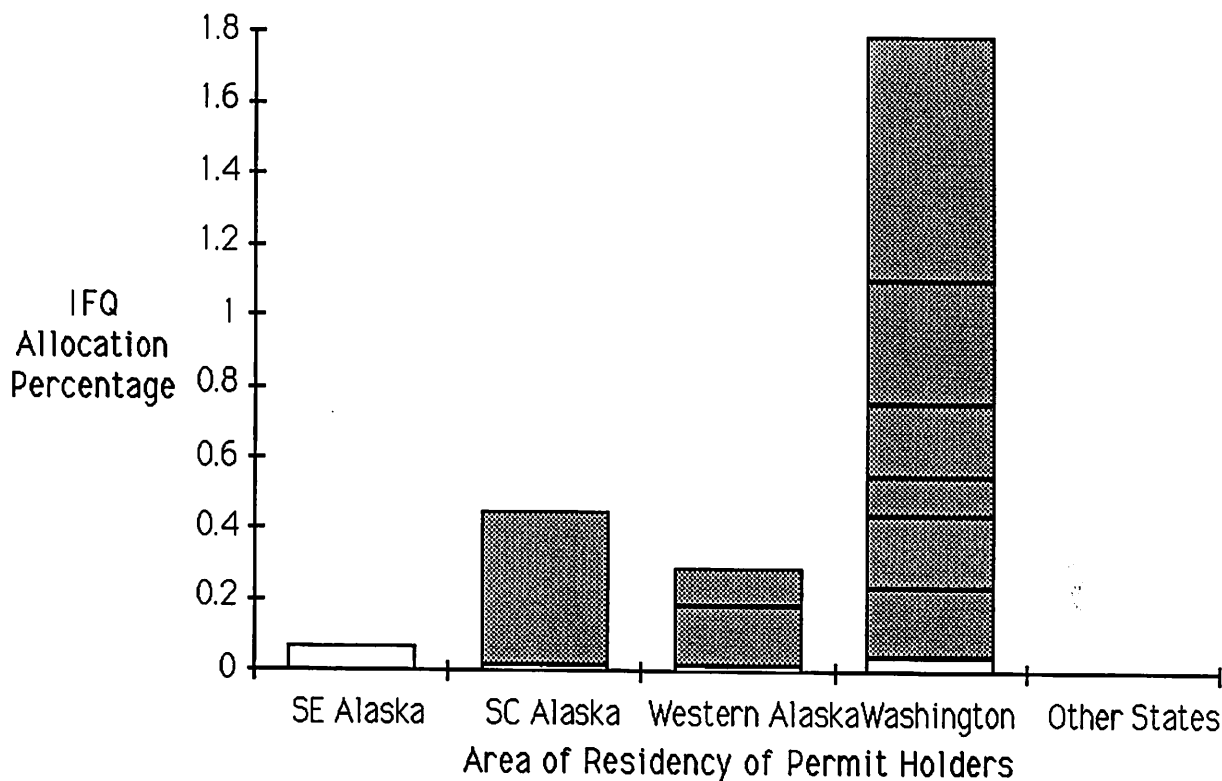
Each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

Qualifying permit holders by area of residency

Southeast Alaska	22
Southcentral Alaska	21
Western Alaska	28
Washington	40
Other states	8

Minimum allocation of top five qualifiers irrespective of residency: 2.0461% each

Figure 8. Distribution of IFQs to Permit Holders, Aleutian Islands



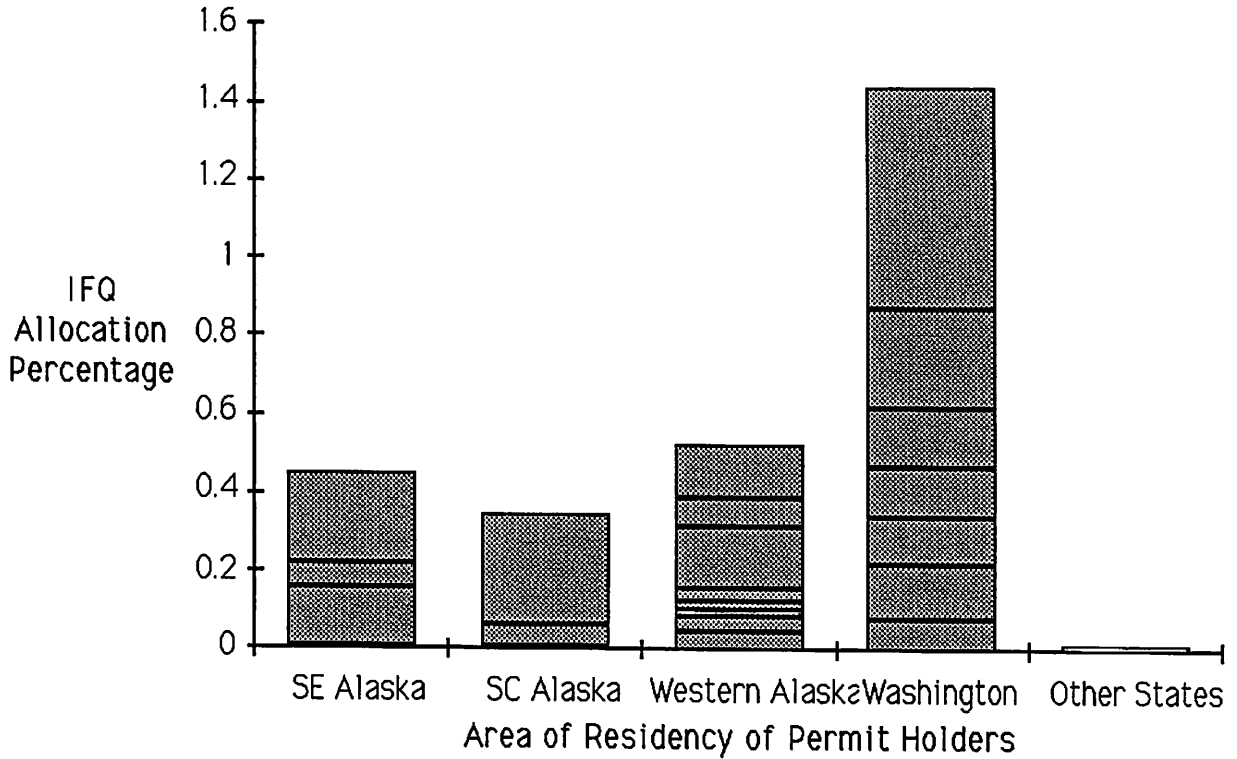
Each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

Qualifying permit holders by area of residency

Southeast Alaska	8
Southcentral Alaska	14
Western Alaska	18
Washington	37
Other states	4

Minimum allocation of top five qualifiers irrespective of residency: 2.0371% each

Figure 9. Distribution of IFQs to Permit Holders, Western Gulf of Alaska



Each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

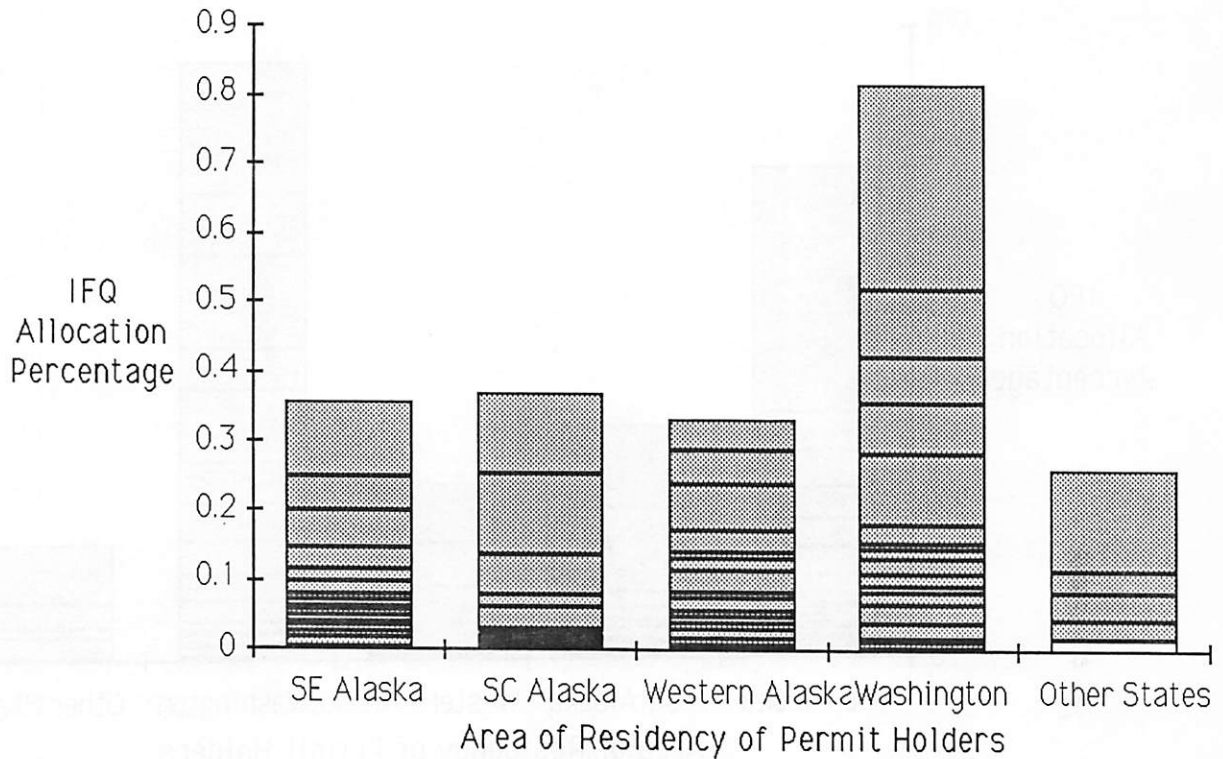
Qualifying permit holders by area of residency

Southeast Alaska	21
Southcentral Alaska	17
Western Alaska	47
Washington	44
Other states	9

Minimum allocation of top five qualifiers irrespective of residency: 1.5371% each



Figure 10. Distribution of IFQs to Permit Holders, Central Gulf of Alaska



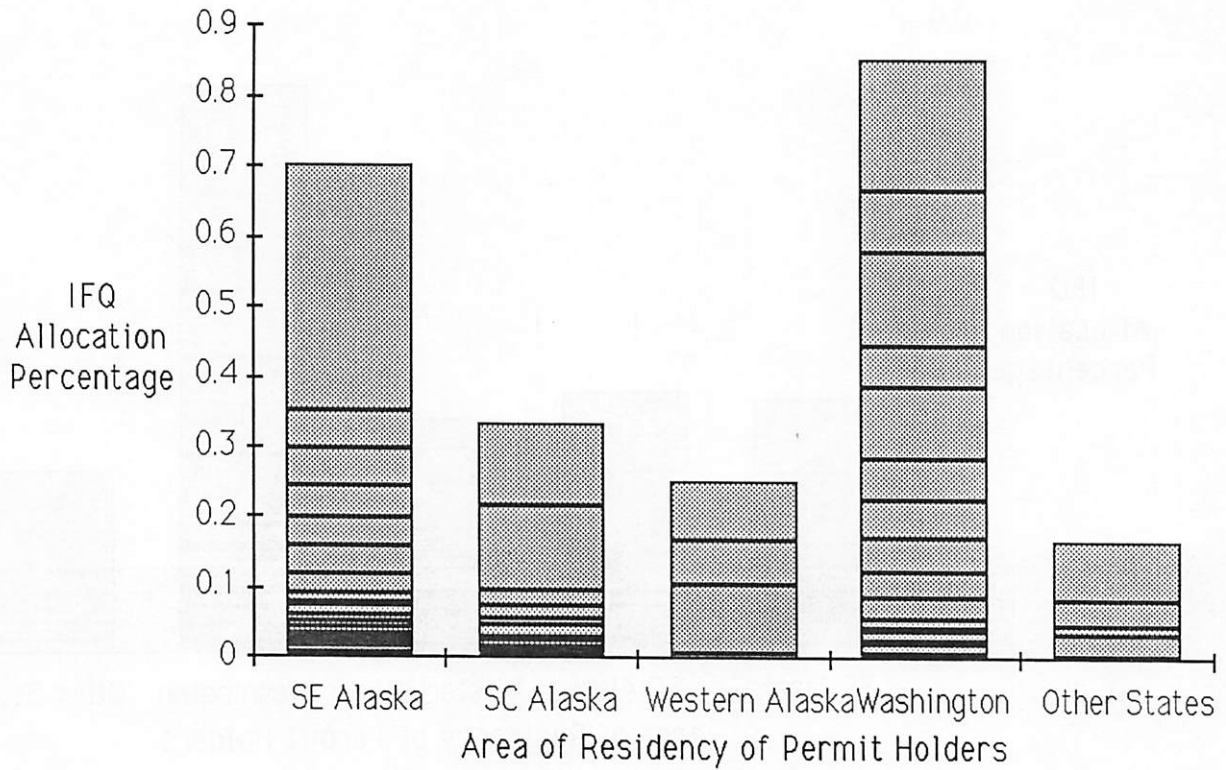
Each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

Qualifying permit holders by area of residency

Southeast Alaska	81
Southcentral Alaska	78
Western Alaska	87
Washington	95
Other states	25

Minimum allocation of top five qualifiers irrespective of residency: 0.9376% each

Figure 11. Distribution of IFQs to Permit Holders, West Yakutat



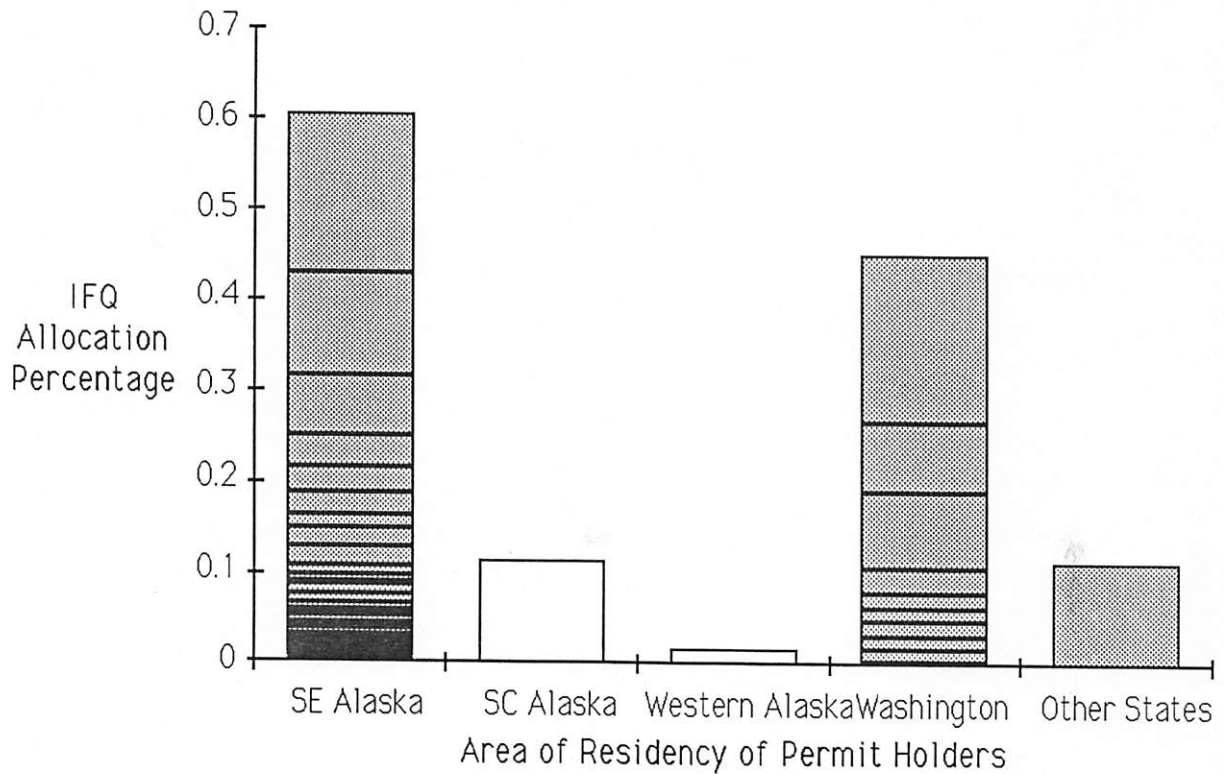
Each shaded area represents the allocation percentage for five individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

Qualifying permit holders by area of residency

Southeast Alaska	106
Southcentral Alaska	71
Western Alaska	23
Washington	87
Other states	25

Minimum allocation of top five qualifiers irrespective of residency: 1.0204% each

Figure 12. Distribution of IFQs to Permit Holders, Southeast Outside/East Yakutat



Each shaded area represents the allocation percentage for ten individuals, although the bottom layer may include up to 9 individuals (see totals below). There are five individuals who qualify for allocations greater than or equal to the top shaded area of each column. Areas below each column which are not shaded represent minimum percentages for that group.

Qualifying permit holders by area of residency

Southeast Alaska	347
Southcentral Alaska	14
Western Alaska	6
Washington	98
Other states	13

Minimum allocation of top five qualifiers irrespective of residency: 0.6179% each

**Appendix II**  
(Revised September, 1988)<sup>1</sup>

How to calculate an individual fishing quota (IFQ)  
under Alternative 3

Alternative 3 is an IFQ (share quota) type management system. A general description of qualified owners and permit holders under three options for qualification was presented in Chapter 6. The three options considered were: 1) all quota assigned to vessel owners; 2) all quota assigned to permit holders; and, 3) half of the quota assigned to owners and half assigned to permit holders. The minimum annual landing needed to qualify is 1,000 pounds (landed weight) in any one of the years 1984, 1985, 1986, or 1987. This appendix is provided to allow you to calculate your own individual share if you qualify under one of these three options. Following the worksheet are examples of how to determine your individual fishing quota.

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1. Appendix II of the initial sablefish management EA/RIR/IRFA incorrectly specified qualifying poundage totals and 1988 longline TACs. Those errors have been corrected in this version.

## IFQ Entitlement Worksheet

This sheet can be used to determine IFQ entitlements in any of the six EEZ management areas. Work through the indicated calculations to determine (1) if you qualify, (2) your qualifying share (percentage), (3) the amount you could land under an IFQ system if 1988 quotas remain in effect.

### REPEAT THE FOLLOWING FOR EACH AREA YOU FISHED

(Areas are Southeast Outside/East Yakutat (SEO/EYK), West Yakutat (WYK), Central Gulf of Alaska (CG), Western Gulf of Alaska (WG), Bering Sea (BS), and Aleutian Islands (AL))

#### Step 1. Did you qualify?

Did you catch sablefish with longline gear in 1984, 1985, 1986, or 1987. If not, stop! You do not qualify. If you did, enter your total landings of sablefish (landing weight/what you wrote on the fish tickets) for each of the years 1984, 1985, 1986 and 1987.

<u>Year</u>	<u>Amount landed.lbs</u>	
1984	_____	(a)
1985	_____	(b)
1986	_____	(c)
1987	_____	(d)

Are any of these four entries equal to or greater than 1,000 lbs? If so, you've qualified for an IFQ share in this management area (don't forget you have to do this for each management area), continue on to Step 2. If not, you're not qualified in this area, go back to Step 1 and repeat for the next area.

#### Step 2. Calculate your share.

Take the two best years from the list above, add them together and divide by two. (Do this for each area.) If you only fished sablefish one year you should divide that one year's landing by two (you only get half credit). This is your qualifying poundage.

	<u>Amount landed, lbs</u>	
Best year	_____	(e)
Next best year	_____	(f)
TOTAL (e+f)	_____	(g)
TOTAL ÷ 2 (g ÷ 2)	_____	(h)

The total qualifying poundage for each area is listed below. Divide your qualifying poundage (h) by the total qualifying poundage in the area in which you've qualified.

<u>Area</u>	<u>Qualifying total, lbs</u>	(i)
SEO/EYK	9,121,375	
W. Yakutat	6,942,400	
C. Gulf	12,939,076	
W. Gulf	3,828,118	
Bering Sea	3,187,693	
Aleutian I.	2,884,509	

Note: Owners' qualifying totals are shown. If permit holders were also receiving quota the permit holders' qualifying totals would also be shown.

Qualifying Poundage (h) ÷ Qualifying total (i) = Share (j)

(h) \_\_\_\_\_ / (i) \_\_\_\_\_ = \_\_\_\_\_ (j)

This is your quota share for this area. (To convert to percent move the decimal point two places to the right or multiply by 100.)

Step 3. Calculate your share (assuming 1988 TACs remain in effect).

The longline TACs for 1988 are as shown below (It is assumed that 70% of BS catch limit and 50% of AL catch limit is set aside for longliners).

<u>Area</u>	<u>1988 Longline TAC</u>		
	Round Weight, mt	Landed weight, mt	Landed weight, lbs
SEO/EYK	6,175	3,890	8,577,450
W. Yakutat	4,655	2,933	6,467,265
C. Gulf	10,032	6,302	13,935,953
W. Gulf	3,250	2,048	4,515,840
Bering Sea	1,700	1,071	2,361,555
Aleutian I.	3,500	2,205	4,862,025

Note: Landed weight assumes Eastern cut at 63% recovery rate.

Multiply your quota share (j) by the landed weight in the area you are looking at. (You can do it in pounds or in metric tons, whichever you prefer.)

## Examples

1. Small boat fisherman in Central Gulf. Fished only the last two years.

<u>Year</u>	<u>Amount landed.lbs</u>	
1984	_____	(a)
1985	_____	(b)
1986	_____822	(c)
1987	_____230	(d)

Fisherman does not qualify. (Did not land 1,000 lbs).

2. New fisherman, entered the fishery in 1987, Aleutian Islands.

<u>Year</u>	<u>Amount landed.lbs</u>	
1984	_____	(a)
1985	_____	(b)
1986	_____	(c)
1987	_____43,200	(d)

Fisherman qualifies. Qualifying poundage is  $(43,200+0)/2$  or 21,600 lbs.

Total qualifying poundage in the Aleutian Islands management area is 2,884,509 lbs, therefore share is

$$21,600 \div 2,884,509 = 0.0075 \text{ or } 0.75\%.$$

TAC (in mt, landed weight) in this area (Aleutian I.) is 2,205 mt (4,862,025 lbs). Therefore, this fisherman's share is

$$2,205 \text{ (mt)} \times 0.75\% = 16.54 \text{ mt (36,465 lbs)}.$$

3. Fisherman from southeast Alaska, has fished all four years in the SEO/EYK area.

<u>Year</u>	<u>Amount landed.lbs</u>	
1984	_____1,200	(a)
1985	_____1,400	(b)
1986	_____2,100	(c)
1987	_____2,800	(d)

Calculate qualifying poundage.

		<u>Amount landed, lbs</u>	
Best year	<u>1987</u>	<u>2,800</u>	(e)
Next best year	<u>1986</u>	<u>2,100</u>	(f)
TOTAL (e+f)		<u>4,900</u>	(g)
TOTAL ÷ 2 (g ÷ 2)		<u>2,450</u>	(h)

Calculate share of TAC in area.

The total qualifying poundage in the Southeast Outside/E. Yakutat management area is 9,121,375 lbs therefore the fisherman's share is

$$2,450 \div 9,121,375 = 0.00027 \text{ or } 0.027 \%$$

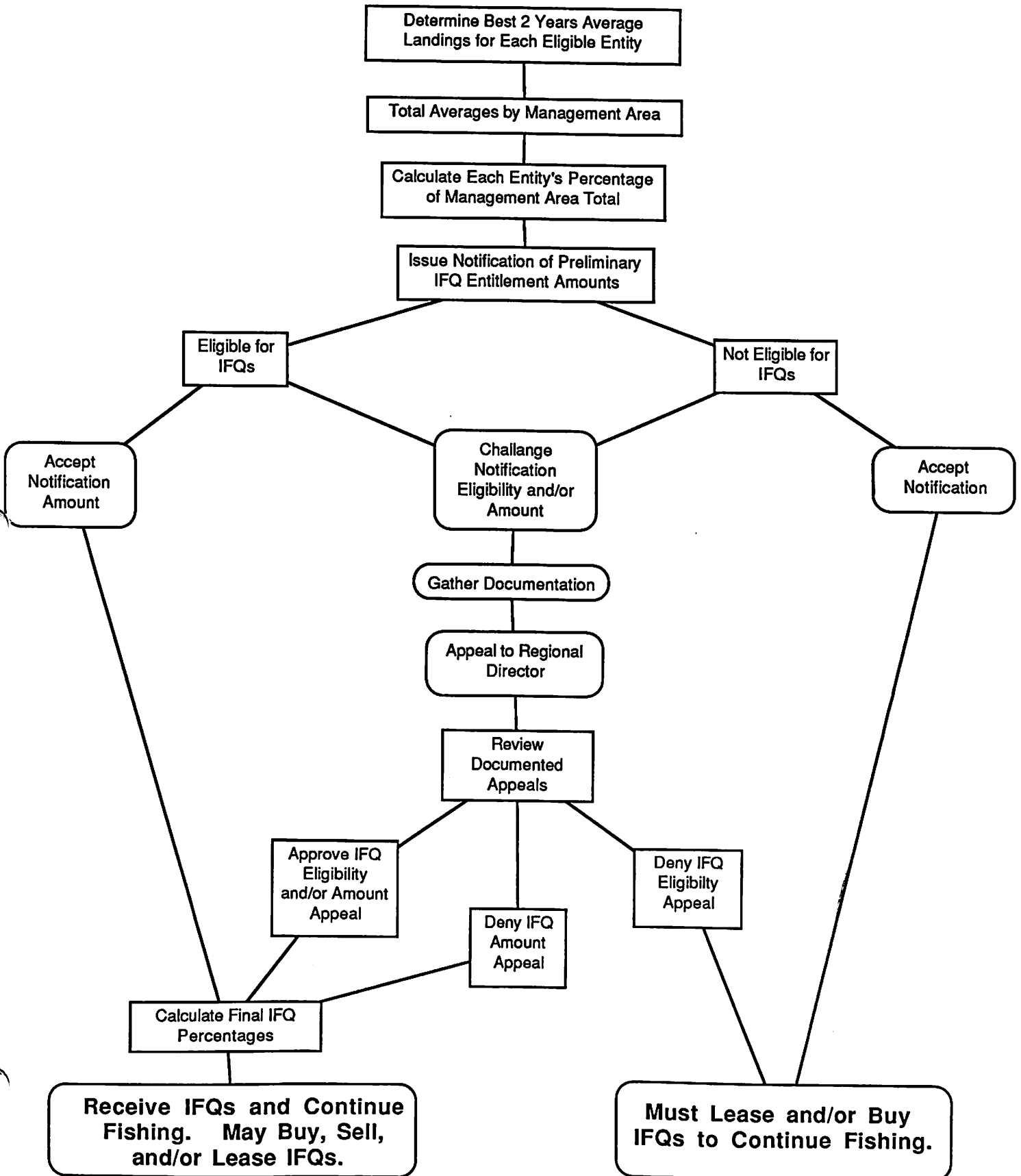
Since the TAC in SEO/EYK (in landed weight) is 3,890 mt (8,577,450 lbs) the fisherman's share is

$$3,890 \text{ mt} \times 0.027\% = 1.04 \text{ mt (2,304 lbs).}$$



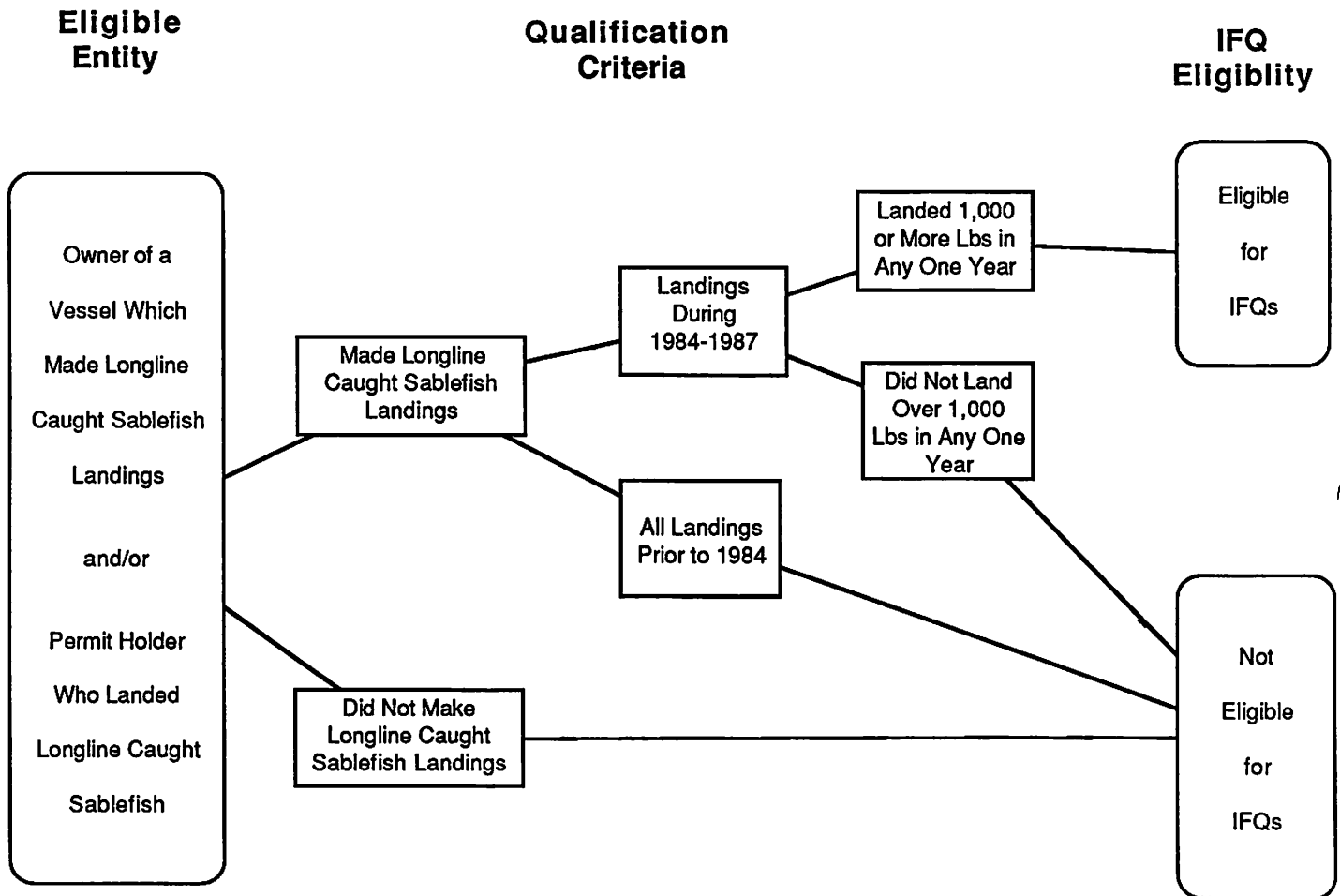
# Sablefish IFQ Issuance Procedures

IFQs Would be Management Area Specific



# Determination of Eligibility for Sablefish Longline Individual Fishing Quotas (IFQs)

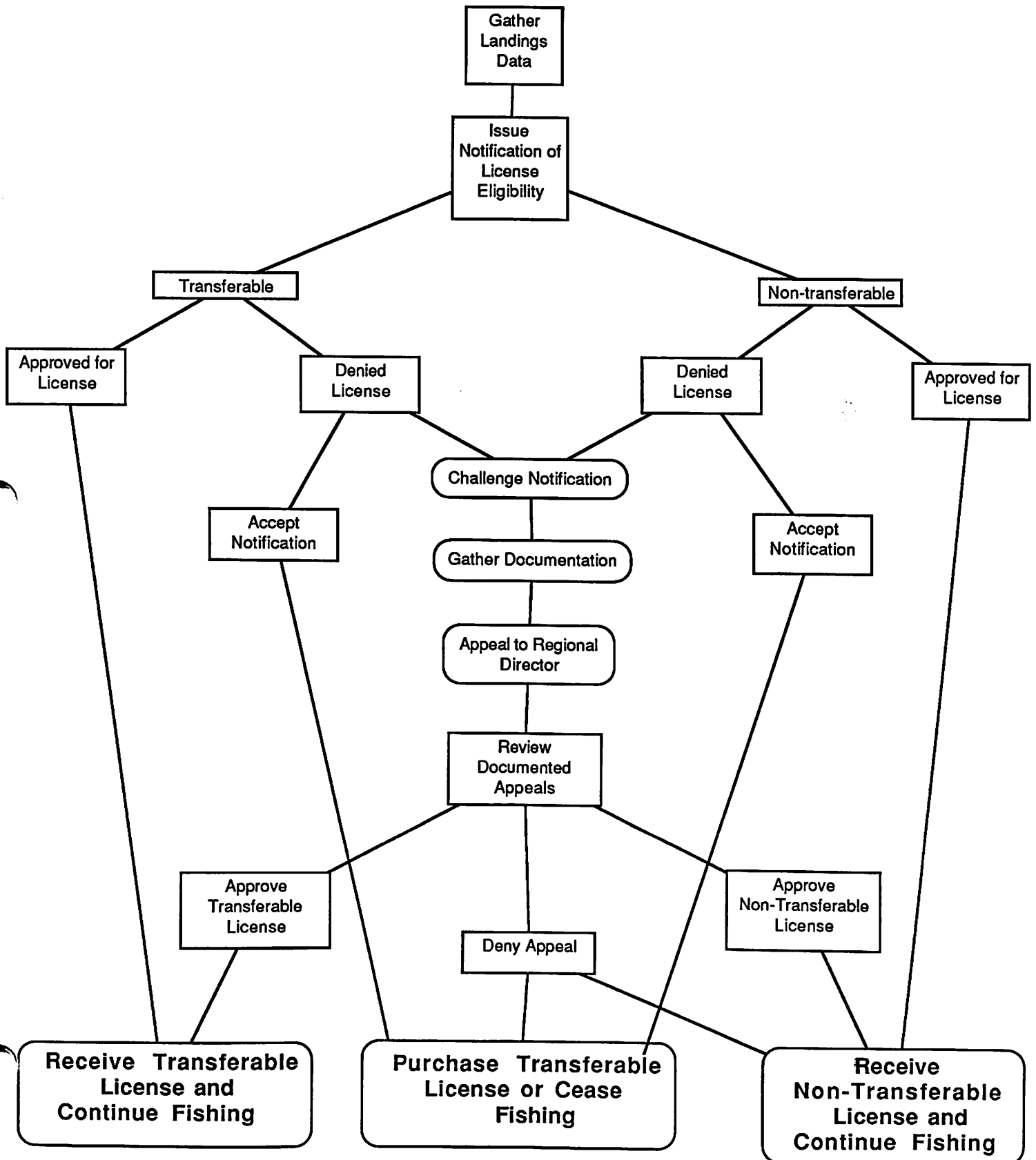
**IFQs Would be Issued in Percentages of the Total  
Allowable Catch for Each Management Area**



- MANAGEMENT AREAS**
- Southeast Outside/East Yakutat
  - West Yakutat
  - Central Gulf
  - Western Gulf
  - Bering Sea
  - Aleutian Islands

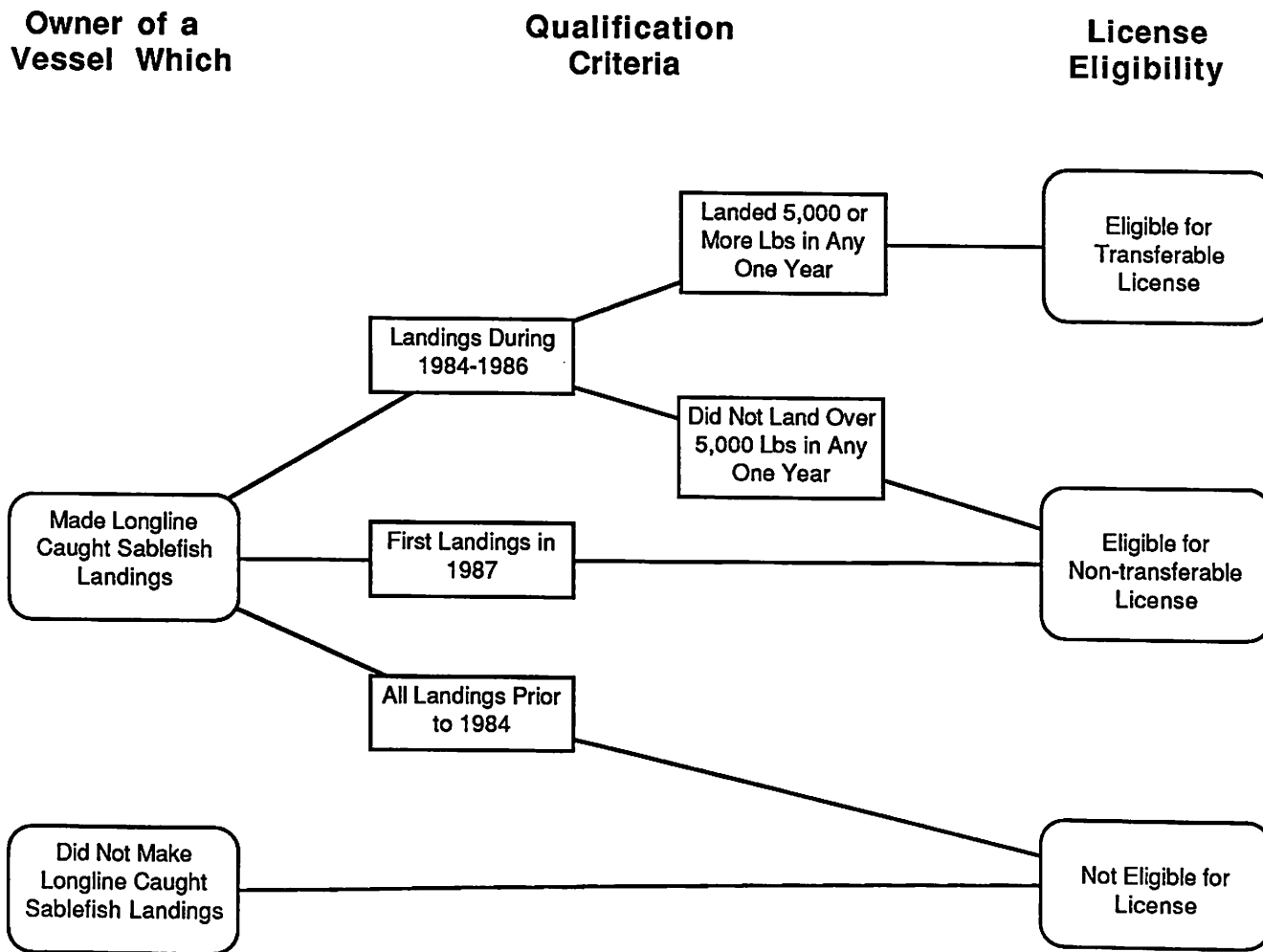
# Sablefish License Issuance Procedures

Licenses Would be Area and Vessel Size Class Specific



# Determination of Eligibility for Sablefish Longline License

Licenses Would be Issued Separately for Each Management Area and Would be for a Specific Vessel Size Class



MANAGEMENT AREAS
Gulf of Alaska
Bering Sea
Aleutian Islands

VESSEL SIZES	
Class A	Below 40 ft.
Class B	41 to 50 ft.
Class C	51 to 60 ft.
Class D	61 to 70 ft.
Class E	Over 70 ft.

**FISHING VESSEL OWNERS' ASSOCIATION  
INCORPORATED**

ROOM 232, C-3 BUILDING • FISHERMEN'S TERMINAL  
SEATTLE, WASHINGTON 98119

August 31, 1988

SINCE 1914

TO: NORTH PACIFIC FISHERY MANAGEMENT COUNCIL  
SUBJECT: SABLEFISH MANAGEMENT ANALYSIS

The Fishing Vessel Owners' Association has examined the Council's June 14, 1988, Sablefish Management Analysis. The Fishing Vessel Owners' Association favors Alternative 4, the License Limitations System.

The following are some of the reasons the F.V.O.A. favors the license systems at this time:

- (1) The marketing structure between harvesters and processors would remain very much the same as it is now. As stated in Section 6.4.2 of the RIR, "the status quo and license limitations would have similar effects on processors."
- (2) The industry is currently in a dynamic flux. All of the Limited Entry alternatives, except for the license system treat the longline industry too narrowly and without regards to current expansion in other fisheries and a license system preserves Council options.

There are existing blackcod participants that intend to target on turbot and codfish. Under an ITQ process, much of the quota will be consolidated into fewer hands if history repeats itself such as in New Zealand and Australia. The new entrants into other longline species and those who sell all their ITQ's for blackcod will begin to have unretainable bycatches of blackcod as they target underutilized species because they do not have ITQ's for bycatch, let alone for directed fishing. Whatever plan the Council chooses at this time must be able to be transformed into comprehensive groundfish Limited Entry program. The license system is the most accommodating to this end with perhaps elements of Alternative 5 enacted as required by the Council.

- (3) The Phaseout Alternative takes into account current investment and commitments and allows people to get out of the business in an orderly fashion.
- (4) There would be a solid core of longline vessels holding blackcod permits available to economically move into underutilized species such as Pacific cod.
- (5) A license system would begin to answer uncontrolled entry and the "halibut syndrome" which occurred between 1980 and 1984. Entry in the halibut fishery went from 2000 operators to over 4000 during this time frame. A license system at this time in the blackcod fishery would help prevent this scenario from developing again.



- (6) The license program will provide a viable income base for a great many vessel owners that can break out into other longline fish such as cod and turbot.
- (7) The license system will help stabilize employment and begin to change the transient nature of crews due to certain instabilities in our industry.

The F.V.O.A. does not support the proposed ITQ system for blackcod. Some of the members concerns are as follows:

- (1) We cannot support a system that allocates 50% of the potential earnings to hired labor. This would be tantamount to having Limited Entry on delicatessens and giving the permit to the Maitre'd. This concept completely ignores the cost of investment of a vessel and its upkeep all of which are paid by the ownership of the vessel. If a hired laborer were given 50% of the quota, the vessel would be held hostage by people who have not invested in the industry. A permit holder who is not a boat owner and skippers a vessel receives payment for his risks and time running a vessel.
- (2) The ITQ is more than a right to fish, it is the sole and only access to the market. This will force the people and corporations with money to buy up the ITQ's as has occurred in Australia, New Zealand and Eastern Canada. The RIR states in Section 7.2.3:

"Processors could buy IFQ's to assure themselves of a source of 'supply' and fishermen interested in entering the processing arena would be able to pool their resources."

Fishermen could easily become sharecroppers and processors could be leveraged out of their current market niche.

The statements in the RIR clearly indicate a significant change in relationships throughout the market chain from harvests to consumer which greatly concerns us. It concerns the F.V.O.A. why the RIR is deficient on the social impacts of a ITQ system when so much evidence is available from foreign nations where ITQ systems have been imposed and the impacts of the system are known. Impacts such as 40 to 50 percent vessel and crew loss in a matter of a few years, job replacement costs, costs of bankruptcies, the evolution towards a sharecropper industry.

F.V.O.A. does not want an ITQ system that will reduce the current blackcod fleet to half of the existing vessels. The vessels fishing blackcod will never fish anything else such as cod because of the obvious economics. The F.V.O.A. does not want an unnecessary loss of employment which will come with an ITQ system.

- (3) The IFQ is more susceptible to foreign buyout than a license system. Due to the inability to trace ownership, any restriction on ownership will soon be side-stepped and restrictions will be without meaning.

- (4) Boat owners entering the cod fishery, either as new entrants or as displaced blackcod operators, will begin a new problem, which is unretainable bycatches of blackcod, which only those with ITQ's will have.
- (5) Alternative 2 will increase wastage. Contrary to the conclusions on Section 7-2 of the RIR, which says that by controlling IFQ's fishermen would be able to land sablefish in any other longline fishery, thereby reducing the discard mortality of sablefish in those fisheries..."

The conclusions of the Future of Groundfish Committee clearly pointed out that with price discrepancy of over \$1 a pound for small sablefish vs. large sablefish "high grading" will take place in order to maximize the value of the limited ITQ's. This will create wastage and increase the mortality of small fish. The Council would have to mandate certain bycatch rates much like in Alternative 5, because there is no guarantee that the vessel owner will save his ITQ's for bycatches in other fisheries.

- (6) The IFQ's could have a devastating impact on local communities if IFQ's were sold to operations outside specific communities. This is acknowledged on page 6-9 of the RIR (June issue).

#### Combination Systems:

There is no support for these alternatives. They combine all the administrative and enforcement burdens of Alternatives 1.2 and 3.4. These alternatives carry all the flaws of all systems. These alternatives are not acceptable.

#### Multi-Species Approach:

The F.V.O.A. is opposed to this option. The Council provides no insight into the economic burdens to force industry to harvest low valued species with high valued species. It should be pointed out that the bycatch committee unanimously recommended against this approach as a management alternative. I am certain the chairman of that committee provided that unanimous position to the Council members about a year ago. The problem of high grading would be increased and administrative and enforcement burdens would be increased.

There seems to us to also be a management authority problem as well. The distribution of halibut as a bycatch in other fisheries is the domain of the International Pacific Halibut Commission.

The protocol for the Commission gives them the following authority:

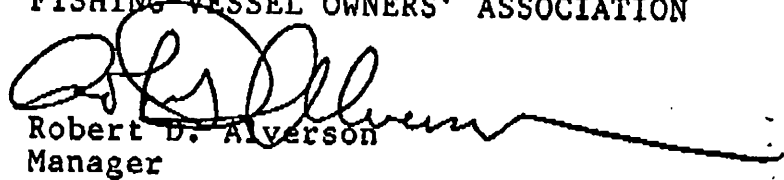
"During both open and closed seasons, permit, limit, regulate or prohibit the incidental catch of halibut that may be taken, retained, processed or landed from each area or portion of an area, by vessels fishing for other species of fish."

At best, the Council could recommend a proposal to the IPHC.

In summary, the F.V.O.A. supports Option 4. The ITQ system is unacceptable and so is the bycatch system. The combination system would create job security in administrative positions but not much else.

Very truly yours,

FISHING VESSEL OWNERS' ASSOCIATION



Robert D. Alverson  
Manager

RDA:cb

bcc: Bob Mace  
John Peterson  
Joe Blum  
FVOA Officers





# Cresting Wave Seafoods, Inc.

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September 23, 1988

North Pacific Fishery Management Council  
Mr. Ron Miller  
P.O. Box 103106  
Anchorage, Alaska 99510

Dear Mr. Miller,

We, Cresting Wave Seafoods, Inc., a Washington Corporation, are an exporter of various frozen seafood products from the North Pacific region. Among those products, we have been handling 3-4,000,000 pounds of frozen Sablefish per year for the last several years.

We are almost exclusively dealing in Alaskan Longline caught Sablefish since the market demands it's much superior quality compared to the Trawl caught product. This inferior quality of the Trawl caught product holds a lessor value in the marketplace, and this has a tendency to depress the entire Sablefish market abroad, throughout the year.

In addition to the quality issue, past catches show that Longliners are harvesting a much bigger size of Sablefish, letting the juvenile fish alone for further growth, while Trawlers tend to scrape them up regardless of their maturity.

We are quite concerned that without firm control in this area, we are going to see in the future a heavy concentration of juvenile Sablefish harvested in Alaska, much like what we see in Oregon and California today.

We are sincerely hoping for N.P.F.M.C.'s considerations to this matter so that we, fishermen, processors, marketers and consumers will all have this marvelous product to enjoy for generations to come.

Sincerely,

Yoshio Ono  
President

YO:ct