

M E M O R A N D U M

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director



DATE: November 23, 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-4(a), Chapter 5 and Appendix from the analysis. Public comments were due by November 30, and those received since the September Council meeting are included with a summary of all comments as Item C-4(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-4(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-4(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 ^{or} 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.

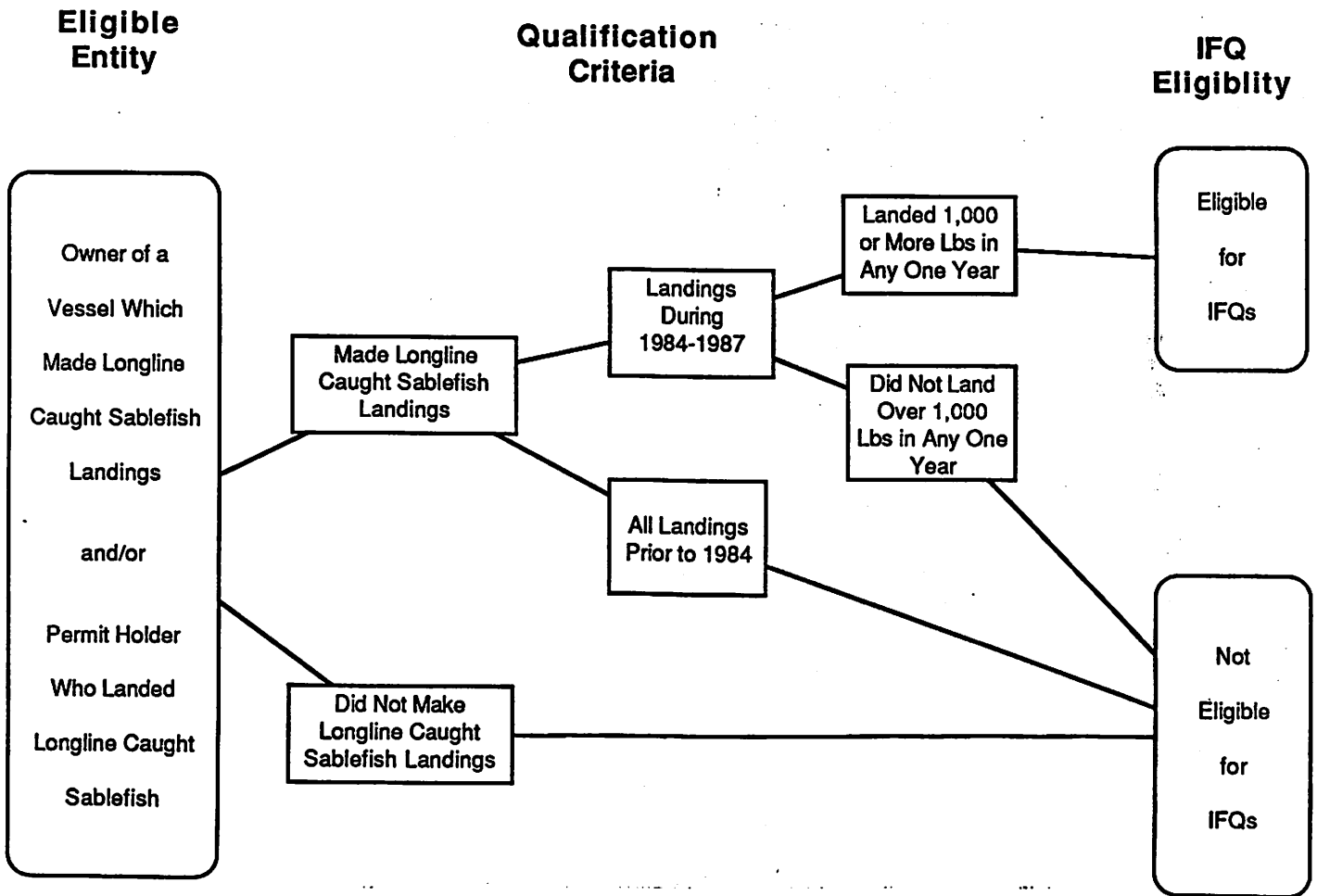
Fishermen (as defined in the initial allocation, that is, vessel owners or permit holders) who wished to change from the open access fishery to the IFQ fishery would receive IFQ allocations equal to the percentage of the overall (as opposed to open access) TAC that they harvested in the preceding year. 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.

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

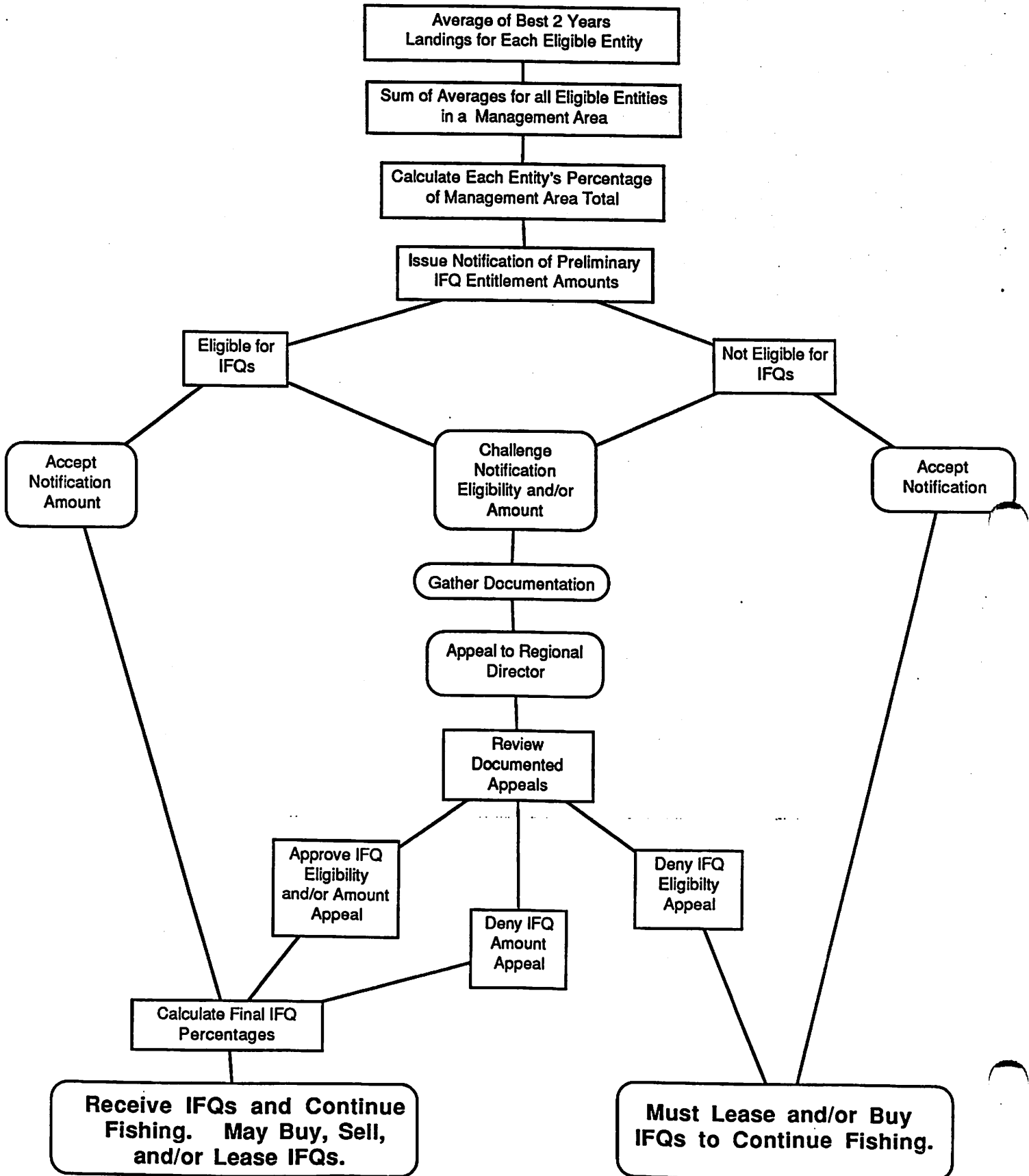
**IFQs Would be Issued as Percentages of the Total
Allowable Catch for Each Management Area**



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

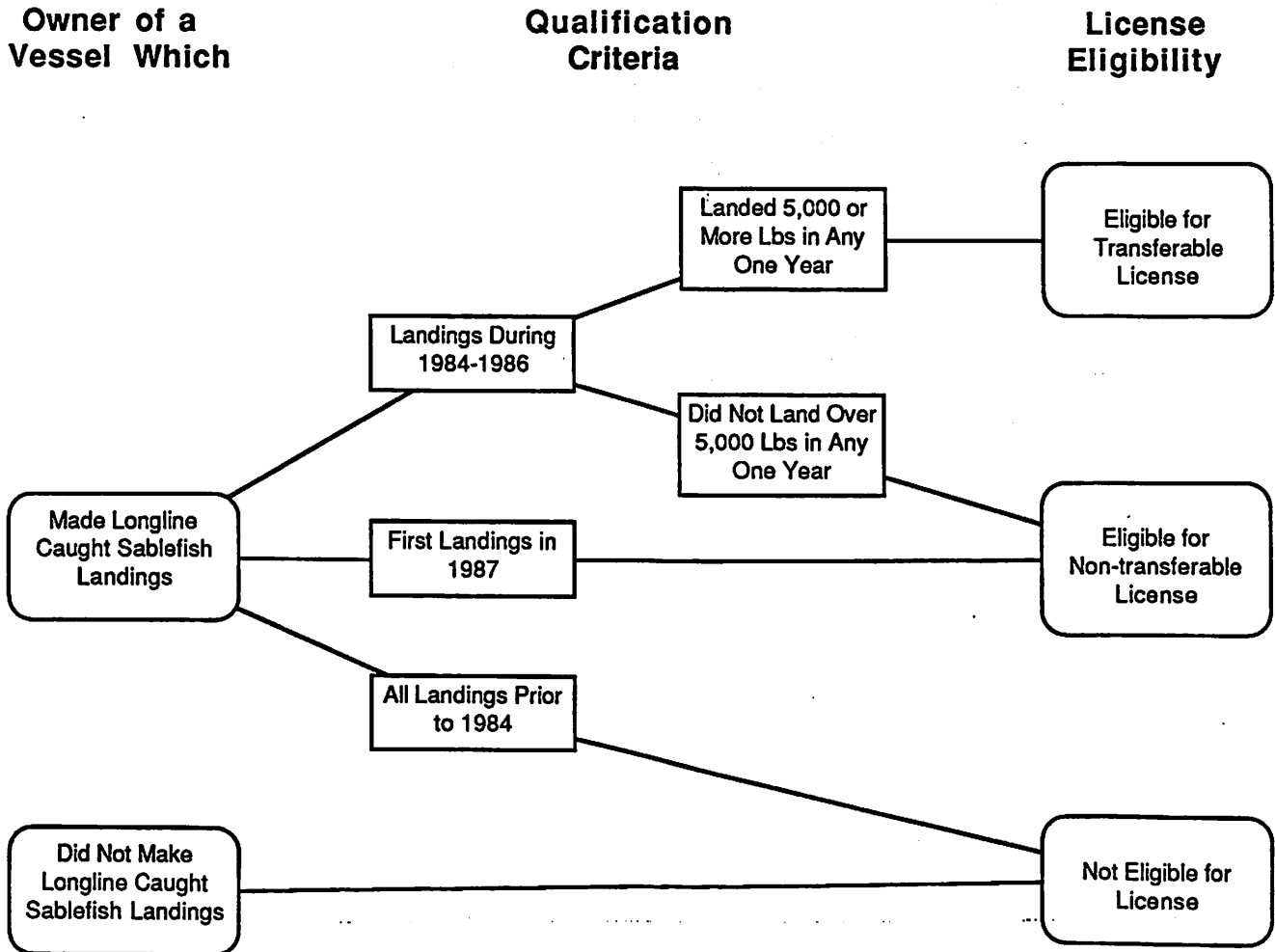
Sablefish IFQ Issuance Procedures

IFQs would be specific to Management Areas



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

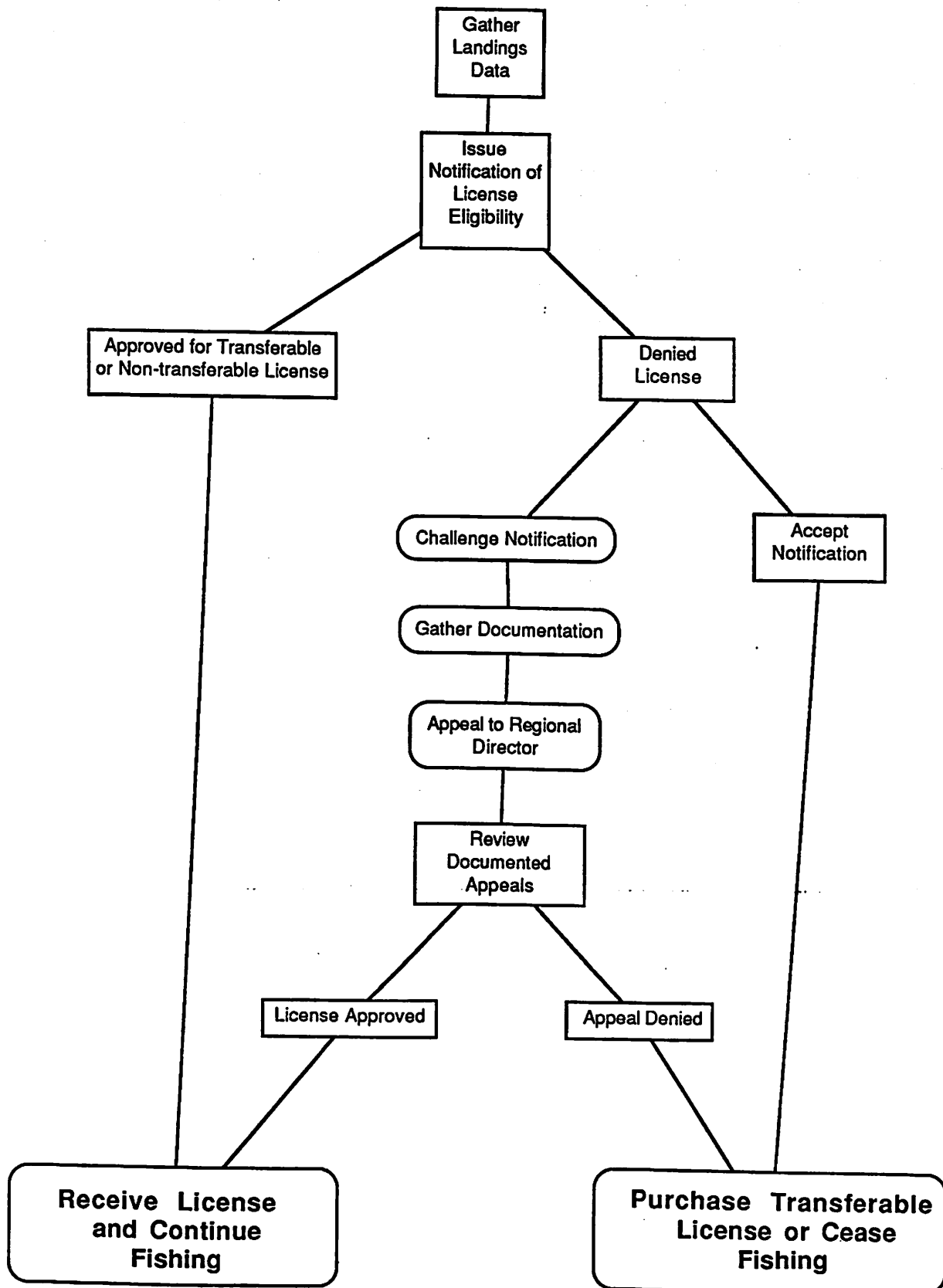


MANAGEMENT AREAS
Gulf of Alaska
Bering Sea
Aleutian Islands

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.

Sablefish License Issuance Procedures

Licenses Would be Specific to Area and Vessel Size Class



LONGLINE SABLEFISH MANAGEMENT: SUMMARY OF PUBLIC COMMENT

Alternative 1: Maintain open access (status quo).

Dean Adams, Seattle - Not the fate of the fisheries of the North Pacific.

Alaska Dept. of Fish & Game - Not in favor of open access since it is inconsistent with stated general management criteria.

Anton Bowers, Sitka - Personally favored but does not seem practical.

Central Bering Sea Fishermen's Assoc., St. Paul - Preferred since it is the only system that would not exclude developing fisheries of the Pribilof Islands.

City of King Cove - Recommends this approach since it will enable local fishermen to participate. City Resolution 88-14 supports this position.

Brad Dickey, Homer - Not an option due to safety and management concerns.

Joseph Dittrick, Kasilof - American citizenship should be the only prerequisite for access to a fishery.

Joe Hess, Sterling - Would like open access changed a little. Annually, quota should be divided among all permit holders based on the net tonnage of their boat. Fishermen could then fish any time during the year.

Jack Hill, Kodiak - As long as the fisheries are protected with quotas and seasons anyone who wants to put up the time and money should be able to participate. The financial lost he feels he would suffer with limited access would be great.

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.

Jon Rowley, Seattle - The status quo is not a viable management option for the sablefish fishery.

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.

Trident Seafoods Corp., Seattle - Strongly supports continued open access since the limited access alternatives listed would not allow them to receive any of the economic value of the resource.

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

Alaska Dept. of Fish & Game - Although such a system would reduce waste of sablefish and halibut associated with discard mortality it is still open access and therefore not acceptable by itself.

Anton Bowers, Sitka - Pacific cod not too prevalent in the Eastern area so this system does not seem practical although making halibut a bycatch species might.

FVOA - Is opposed to this system. There would be economic burden and a management authority problem.

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 make matters worse. It would exasperate problems in the halibut fishery and presents a wide range of new problems in the areas of conservation and enforcement.

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.

Alaska Dept. of Fish & Game - This system, or a combination system incorporating IFQs, has the greatest potential for avoiding some of the problems associated with a strictly open access system. Also, such a system could be designed to continue to provide employment for fishermen, provide safeguards to coastal communities, and allow for rural residents not yet involved in the fishery.

Anton Bowers, Sitka - If this is chosen shares will eventually go to fishbuyers and fishermen will have to take whatever price is offered. Also, what would stop foreigners from controlling the shares?

Central Bering Sea Fishermen's Assoc., St. Paul - If IFQs are adopted in the Bering Sea the Pribilof Islands should receive a full entitlement share of the quota. This is based on the mandate given to these people by the U.S. government.

FVOA - Does not support IFQs since it could allocate 50% of the rights to hired labor, it is the only access to market and could reduce fishermen to sharecroppers, is more susceptible to foreign buyout, would result in discarded blackcod in other cod fisheries, would result in highgrading, and could adversely impact local communities if sold to non-local operations.

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.

Scott Landis, Port Townsend - Totally in favor of this since it will help with gear problems and too many boats. Anyone selling IFQs should be required to sell all they own to prevent too many boats on opening day.

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.

Mark Lundsten, Seattle - IFQs or a combination system should be instituted. The system should be designed so that it could be incorporated into a comprehensive plan for limiting effort throughout the groundfish fishery.

Jon Rowley, Seattle - The only sensible long-term solution. Without a question it is the best system for the consumer, food service, retail, and distributions sectors and would favor an orderly development of domestic markets.

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.

Bill Rotecki, Ketchikan - This is the best system to optimize biological yield and reduce problems. Such a system would result in: increased efficiency of fishing operations, increased safety, less gear and dead fish left on the grounds, legalization of incidental catch, higher quality products, higher profits, more dispersed fishing times and lower prices benefiting the consumer, etc. His letter of November 28 lists a lengthy comparison of the arguments between open access and IFQs.

Kirk Wollin, Sitka - IFQs are the only way to go. The continued loss of human life, boats, fishing gear, and the resource associated with open access is avoidable and not necessary.

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

Alaska Dept. of Fish & Game - This system begins to address the problems of open access by reducing the number of vessels (and therefore gear, gear loss, and deadloss) after two years. However, it could eventually return to a derby fishery and after two years there would be an abrupt layoff of fishermen.

Anton Bowers, Sitka - Prefers this system, given the inevitable choices. Would have to limit boat size and tie licenses to statistical areas. The Council must decide the number of vessels of each size needed and decide on a point system based on gear, investment, income dependency, etc. Licenses should go to individuals and the 1985 cutoff date used for the Gulf.

Jon Claypool and Larry Ward, Eureka, CA - Submitted a license plan somewhat different than that under Alternative 4. It includes a limit on the number of hooks per boat based on number of crewmen, phases out catcher/processors, and allocates some of the quota to a mixed longline fishery.

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

FVOA - The marketing structure between harvesters and processors would remain very much the same. Also, licenses allow for current expansion in other fisheries and preserves Council options. It is also transferable into a comprehensive groundfish limited access program. It allows people to exit the fishery in an orderly fashion, preserves a solid core of longline vessels, would begin to answer uncontrolled entry problems, would provide a viable income base for many vessel owners, and would help stabilize employment.

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.

Jon Rowley, Seattle - Licenses create as many problems as they address and do nothing for derby-style openings or inclement weather.

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.

Anton Bowers, Sitka - Sounds great in theory but the regulations would rival the IRS.

Brad Dickey, Homer - Combining IFQs, licenses and multi-species is a must. This would allow delivery of several species from one trip and halibut will have to be dealt with soon anyway. The minimum poundage requirements for the IFQ and license segments should be lowered to 300 lbs.

FVOA - No support, they carry all the flaws of all systems.

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:

Dean Adams, Seattle - Adopt Limited Access for reasons of safety, gear conflict, bycatch, quality of the product, and management of the fishery.

Kenneth Allread, Western Alaska Fisheries, Kodiak - He is opposed to any form of limited access. If the Kodiak boats are eliminated from the longline fishery many of them would fail or relocate and this would have a terrible effect on the Kodiak economy.

Anton Bowers, Sitka - Regardless of what system is chosen, the Council must answer certain questions: who should have access to the fishery, big boats or little, owners or operators? Favors traditional fleet.

Thomas Branshaw, Cordova - Limited entry is the only solution, all others are just short-term put-offs.

Raymond Campbell, Kodiak - The EA/RIR is a classic example of putting a study together to support already formulated opinions and conclusions. Any crew members and fishermen not already sablefish longlining would be those most hurt by limited entry schemes but they are not included in opinion surveys. Increased effort in recent years is in response to the Council's discussion of limited access.

City of King Cove - The Council should consider the concept of a community share quota system.

William Nicholson, Bristol Bay Herring Marketing Co-op, Dillingham - Opposes any form of limited access. This is because non-Alaskans are benefiting and ample time should be given for residents to gear up.

Yoshio Oono, Cresting Wave Seafoods, Seattle - An exporter of longline caught sablefish from Alaskan waters, he feels the Council needs to take firm control of the fishery to preserve quality and size.

Jon Rowley, Seattle - A multi-species IFQ system would minimize bycatch problems and insure continuous market supply.

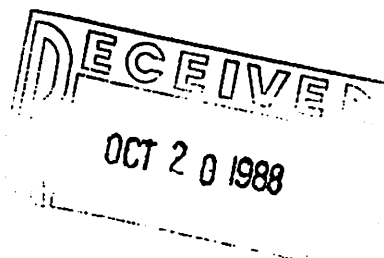
Peter Schmidt, Marco Seattle - Some form of limited access is required for long term management. His immediate concern is that the proposed cut-off dates would eliminate the introduction of freezer/longliners into the fishery, vessels which produce high quality product.

David Shrader, Kodiak - 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 is irreversible.

Trident Seafoods Corp., Seattle - No imposition of limited access in sablefish should occur until the Council decides what action it will take with regard to FOG recommendations. Any allocation of economic rights in a fishery must include all historical participants including the processing sector.

Ric Vrsalovic, Whittier - Wants to show support for any type of limited access system and hopes it will be done soon.

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



Mr. Chairman:

This letter is in regard to the issue of limited entry for the black cod fishery. At the January meeting of the council and at a limited entry seminar in Seattle, both of which were prior to the fishing season, I recall distinctly hearing ... "These meetings are not a forum for the discussion for or against limited entry...That issue has been decided." Apparently over the course of the season, the facts that merit limited entry have been forgotten or dimmed. I was very active in the black cod fishery this year and my feelings for limited entry have been amplified due to the progression of this fishery. "Senility", rather than "growing pains" describe this all too young fishery.

One hundred years... That is how long it took the halibut fishery to disintegrate the form it held for so many years. In my opinion it is a glorified sport fishery. The black cod fishery on the other hand, may achieve this dubious achievement in less than ten years following the "Americanization".

Nothing has changed in one season... The fisheries management situation is continuing to worsen.

Status Quo... in my opinion, is not the fate of the fisheries of the North Pacific.

Safety... In just one season, the number of injuries (claims) are up over last year's injuries by thirty per cent. 1987 was an all time high, also. Claim adjustments have increased over thirty per cent and counting. The year isn't over yet.

Gear Conflict... In years past, as I cut miles of lost Japanese gear from my gear, I told myself, "I can't wait to cut some American gear for once". I got my "chance" this year. One example; My gear got entangled with something on the bottom in 400 fathoms (two thousand four hundred feet) and it parted under the strain. I chose to "drag" for the gear with my grappling gear. I picked up 5 different types of American gear. My gear was unfortunately not one of them.

Bycatch... More gear is on the grounds. The grounds can accommodate only so much gear before excess gear goes into the depths frequented by black cod and halibut. It is not by choice that increasing numbers of fishermen have to fish in this manner. This is an unnecessary problem for a gear type that is renown for its' ability to catch what it is targeted on.

Quality of product... This subject requires no comment in light of the halibut fishery.

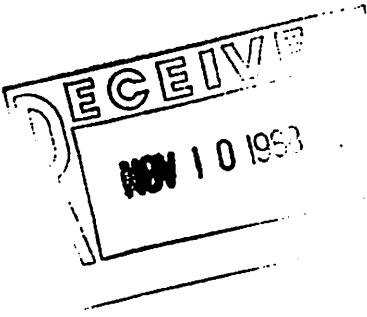
Management of the fishery... the roulette method, in my opinion, is not deserving of the fishery.

I urge you to accept limited entry.

Thank you,

Dean J. Adams

Dean J. Adams
F/V QUEST
FVOA, President



BRISTOL BAY HERRING MARKETING CO-OP

October 28, 1988

John Peterson, Chairman
North Pacific Fishery Management Council
P.O.Box 103136
Anchorage, Alaska 99510

Dear Mr. Peterson:

On behalf of the membership of the BBHMC I would like to express our concern for any type of limited entry program in regards to bottomfish.

It is our concern that ample amount of time is provided for more Alaskan participation in the fisheries off our coastline.

We would like to go on record as opposing limiting access in any form on the sablefish longline fisheries off Alaska. The reason for this is because we feel that non-Alaskan fishermen are benefiting, and ample time should be allowed for residents to gear up.

It is our belief that more Alaskan's are looking at participation in this fishery and other fisheries in the FCZ in the near future.

We realize how fast the bottomfish fisheries are developing, maybe too fast, however it is our opinion that Alaskans should benefit more than they already are.

Thank you.

Sincerely,

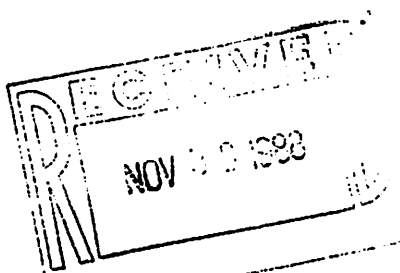
William H. Nicholson,
President

Telegram received over phone, 11/29/88

TO: North Pacific Fishery Management Council

As a fisherman who has a lot at stake as to your decisions which will be made on December 5th, I must say the only true and lasting answer to the situation regarding my longline livelihood would be to make it a limited entry fishery as all the other alternatives are just a short-term put-off.

Thomas D. Branshaw
P.O. Box 591
Cordova, Alaska
F/V JOHN DAVID



Anton Bowers
Box 1445
Sitka, Alaska 99835
26 November 1988

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

Re: Comments on the Draft
Regulatory Analysis for
Sablefish

Gentlemen:

My concerns regarding the regulation of the Sablefish fishery have not changed since writing the attached letter last May. However I did not address all the alternatives which are being proposed in the draft regulatory analysis. I wish, therefore, to address these other alternatives at this time:

1) Status quo: I personally favor this, but being a realist, I know some form regulation is going to happen and, therefore want the most practical system.

2) Multispecies longline fishery: This is a provincial idealistic idea. It was put forward in a hope to combine longline caught Pacific Cod, Halibut, and Sablefish into one fishery. Pacific Cod are not too prevalent in the Southeastern and Yakutat areas nor are they usually found at the depths where sablefish are found. They do share the same habitat with Halibut, however. The habitat for Halibut and Sablefish do overlap to a small degree.

Many fishermen do not find longlining Pacific Cod to be economically feasible. Since the Council has seen fit to give 12,000 mt to Japanese longliners, next year the price for this specie will be even lower than it has been.

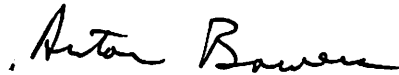
Therefore, how would a multispecies fishery be set up when many fishermen do not want to fish all species and all species do not exist in the same proportions in all areas? It sounds good on paper but I do not believe it is practical. I can see making Halibut an incidental catch to both Sablefish and P. Cod but I cannot see requiring fishermen to deliver a fixed percentage of each specie.

3) Individual Fishing Quotas: I cannot reiterate enough that if the Council chooses this method and leasing the shares or if corporate ownership of the shares is allowed the shares will eventually end up in the fishbuyers (be they foreign or domestic) hands and the fishermen will have to take whatever price is offered them if they want to fish. They will not have the option of choosing where they want to sell the fish or shopping for the best price.

4) Licence limitation: As stated in the attached letter, I think this is the way to go. It is a tested system that works - any other system will be flawed with loopholes which will take years (if ever) to work out.

5) Combination system: Again this sounds great in theory but actual implementation would require a set of regulations which would rival our internal revenue system. If you want a system which will work - keep it simple.

Very truly yours,



Anton Bowers

Anton Bowers
Box 1445
Sitka Alaska 99835

29 May 1988

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

Re: Comments on controlling access
in the Alaska longline sable-
fish fishery

Gentlemen:

I personally do not believe in any kind of government regulation of fisheries other than to enforce a quota for conservation reasons. However, boomers who used to scream that King Crab quotas were too low and, consequently, fished out the king crab and who then turned to dragging until now the pollock stocks are threatened are now invading longline fisheries. Since salmon, herring, and crab in Alaskan state waters has gone limited entry, boats fishing those species have a virtually non-competitive sanctuary where they can be assured an income while dabbling in non-limited fisheries.

Perhaps, if those who hold limited entry permits were restricted to fishing only these fisheries in which they held permits the problem would be solved. This is not a politic solution, however, and doubtlessly would never fly. To be realistic, then, blackcod and longline fisheries in general must institute some sort of limitations in self defense.

So the questions arise: Who should have access to the fishery? Skippers, boat owners, silent & absentee partners, owner-operators just who? and how should the effort be controlled? Limited access or some kind of a division of the quota system?

Before these detailed type questions can be answered some more comprehensive, general type guidelines must be set. Specifically: who does the Council want to operate in this fishery? Should it be fished by mega-buck, multi-boat owner corporations which will eventually turn it into a catcher-processor fleet operation requiring much enforcement; or should it remain the traditional owner-operator, under 90 foot boat fishery which deliver to a shore based processor? Should financial capability be the consideration - or - financial dependancy?

My arguments, henceforth, favor the traditional longline fishing fleet. This fleet has shown for some time that it has the capability to catch the blackcod quota in a reasonable time during the summer months without any help from the boomers. This traditional fleet makes its living solely from longlining and does not flit from fishery to fishery wherever the profit looks best. It has been longlining for generations.

The boomers, on the other hand, have only entered longlining during the last few years since it has become a viable fishery and will disappear as soon as they find somewhere else to put their money which looks more profitable.

Nine years ago Canadians were still fishing halibut in U.S. waters although we could not fish in theirs. U.S. longliners, who were primarily halibut fishermen then, successfully worked to make the U.S. waters strictly for U.S. halibut fishermen. Then there was the battle over the 60-40 split in area two; that gave Canadians 60% of the quota in area two and U.S. fishermen 40%. We argued and eventually convinced the IPHC that the division should be determined on the biomass and not by a fixed ratio.

The Japanese were allowed to catch nearly all the blackcod in those days and would only pay a piddling amount for U.S. caught fish. Consequently, there were few U.S. blackcod fishermen. But the Magnuson Act was on the books and we gradually caught more and more of the quota until we finally pushed the Japanese out of the fishery. This brought the price up closer to where it should have been all along. Pot boats began to increase and trawlers began to target on the specie.

During the early 80's we continued to attend meetings and lobbying when we should have been fishing until we succeeded in getting regulations which banned pot boats from the Gulf of Alaska and reduced the trawler take to incidental catch only. Now that those who pioneered the U.S. blackcod fishery, paid their dues and fought the necessary battles to make longlining in general and fishing blackcod in particular a viable fishery, every body wants to get into act.

It seems to me the traditional longline fleet should be the recipients of the fishery no matter what method is instituted to regulate the effort. They have shown the stability to hang in there even when the prices were down and the fish were scarce and they have demonstrated the ability to catch the quota as well as being the ones who fought the battles which made the fishery what it is today.

Determining who amongst the traditional fleet should be allowed to participate in the blackcod fishery would tax Solomon. How this is determined will depend in some degree on what method of regulation is selected.

NMFS prefers a share-quota system because they think it is simple and would require no enforcement. All they need do is divide a persons or a boat's catch over the years by the respective quota and, voila, that's the share the guy gets. But is that fair to those who fought the battles and stayed with the fishery in both good and bad times. It seems to me it would favor the big boat newcomer who can carry big crews, stay out in bad weather, have automatic baiters and have come in with big catches during the last few years.

As far as enforcement is concerned it strikes me that NMFS is

for many) Terribly naive and doesn't understand a fisherman's nature. A fisherman is a guy who is willing to stake his bankroll and even his life on his ability to outwit the weather as well as the fish. Outwitting the fish-cops is a mere warming up exercise. Especially with the penalties so miniscule in comparison with the potential profits involved.

For example: What will a boat do when he comes in and finds that he has accidentally gone over his allotment. He will simply make a deal with someone who has not used up their share yet to deliver the excess in the other man's name. That may not seem like a big problem but before long some financier who has bought up a lot of shares will put a tender in a secluded cove on the way to town and relieve fishermen of their excess fish or buy blackcod from fishermen who have no shares at all - all this at a reduced price of course - and deliver them in his own name without ever having put a hook in the water. How would that be controlled without an enforcement effort. I'm sure that there are many more ways to get around the share quota concept that will have to be ferretted out by enforcements types. Even the New Zealanders say that this system has turned out to be much more complicated than they thought it would be and they have not yet gotten the bugs out of it yet.

New Zealand, Iceland, and Canada all limit foreign investment in their countries whereas we do not in the United States. What is to stop foreign (e.g. Japanese) investors from buying up these shares behind the scenes? We would be right back to where we were before the FCMA. It wouldn't even surprise me if it was these foreign interests who have convinced NMFS to favor the transferable share quota system. The State of Alaska has already instituted a limited access system for Blackcod in state waters of Southeast Alaska. Why have a completely different system for the same fish in federal waters?

If a fisherman were limited to a given poundage of fish and the price ranged from \$1.10 per pound for under two pounders and increased 15¢ per pound for each pound size to a maximum of \$1.75 a pound for fish over five pounds, would he be inclined to throw mack the smaller, less valuable fish - even when they had little chance of surviving - and fill his share with the large, valuable fish? The boomers who are out to make a quick buck in spite of what damage they do to the resource definitely would. These are the guys who gaff, horn (even though it tears off half its head) and throw back an undersized halibut because the law does not allow them to keep it. That fish has absolutely no chance to survive and grow bigger. The traditional professional longliner probably would not. He is the type who skillfully shakes an undersized halibut with a minimum of damage to the fish even though it takes more time.

The limited access system, on the other hand, is the one which has been successfully tried in this country. It has gone through the courts already, its bugs have been worked out and it works. If the quota shares are fairly distributed (i.e. based on more factors than just numbers) Limited Access is no more complicated when

determining who gets to fish. Also I see no more enforcement involved - and perhaps less - than with a share quota system.

Such a system would have to limit boat size to the status quo so that all the little boat permits do not suddenly become big boat permits. I would even suggest a maximum length and/or tonnage to discourage catcher-processors. Remember 13 Japanese catcher-processors used to be all that was necessary to catch the whole quota and then some, Ninety foot maximum l.e.a. and/or about 120 tons maximum gross weight sound reasonable to me.

The permits should be tied to the Statistical areas. There is no reason why someone who qualifies for a permit in Southeast Alaska and has never fished west of the Fairweather Grounds should have a permit he can sell to someone who will use it to fish in other areas. We're trying to reduce the effort - not increase it. If a person qualifies for permits in more than one area, however, then he should receive permits for all those areas.

The council must then decide how many boats of the various sizes involved can fish in any given area. Then the fun begins. The council must formulate a point system with points allowed for previous crewing on blackcod boats, ownership in blackcod boats, ownership in blackcod gear, operating blackcod boats, income dependency on the fishery, and any other valid factors. Determining how much weight to put on each of these considerations will prompt much animated discussion - but it can be done. Then the applications are sent out and a deadline set for their return. Upon their return the applicants are listed in order of their total points. The total number of boats allowed is then reduced a certain percentage to allow a reserve for those who point totals change upward due to appeals, etc. The list of applicants is then struck off at that number. Those above the line get permits - those below do not.

Permits should be issued only to United States citizens and a person should be limited to one per area. They should be limited to individuals - not to corporations and not to boats. The State of Alaska has been doing it this way for years. It has been tested in the courts and once in place it is relative simple and it works.

No matter what system is chosen, participation after 26 September 1985 should not be considered in qualifying for a permit or shares. Those who entered the fishery after that time had fair warning that they might not be considered in any effort limiting scheme. To choose any other date will be inviting lawsuits.

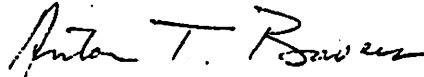
The Bering Sea and the Western Aleutian Areas should also be considered for limiting effort in conjunction with the gulf. But since the 26 September 1985 date only applies to the gulf other dates might be set for those areas.

At the workshops on this issue there was some concern about

financing a buy-back program for these don't qualify for permits. The State of Washington had a buy back program when they instituted Limited Entry but the only boats they acquired were hulks which no one else would buy. The good boats round used in other fisheries. The State of Alaska also had a buy-back program authorized but never had to use it. Certainly no boats entering the fishery or getting a new owner after 26 September 1985 should be considered for buy-back nor should boats involved in other fisheries during or after their participation in blackcod.

Any financing needed to implement a buy-back program should come from a surcharge on blackcod delivered. I personally think this whole buy-back idea is a red herring and will never come to pass.

Lots of luck,



Anton T. Bowers

FIU Hecate

Jon Claypool / Larry Ward

CEIVE
NOV 22 1988

A PROPOSAL FOR THE MANAGEMENT OF CERTAIN BOTTOM FISHERIES OF ALASKAN & ADJACENT WATERS: LONGLINE

- I. The purpose of this plan is to facilitate the efficient and reasonable management of the regional longline industry.
 - A. Plan must permit maintenance of healthy fish stocks while recognizing year to year and cyclical variations in abundance.
 - B. Plan should aim to maximize employment both on the water and ashore and also attempt to increase total value of product.
 - C. All participants in the fishery must be accorded a reasonable opportunity to make a good living.
 - D. Management plan should improve flow of products into the market and allow greater emphasis on quality
 - E. Plan should alleviate problem of too much fishing capacity in the Gulf of Alaska. .
 - F. Most management plans either create a static industry with little incentive for the remaining fishermen or else create a situation where a young man needs a brother-in-law who owns a bank to get started. Regulations must recognize and even promote the dynamic, evolving career cycle of the fisherman.
 - 1. Typically fishermen enter the business young and poor with neither the experience nor the equipment for top production.
 - 2. During a fisherman's middle years his effort and his catch are greatest.
 - 3. Before retiring, a fisherman may slow down and reduce his effort.

- II. The three geographic divisions of this fishery into Gulf of Alaska, Bering Sea, and Aleutian waters recognizes basic differences and should be retained. Transferable Boat--Effort Unit licenses are to be issued for each area based on fishing during qualifying years. permits are given to the boat owner or skipper (only 1 per boat) and are transferable wholly or in part (see below).
 - A. The Gulf of Alaska experiences too much effort basically because of fishing by non-fulltime longliners. While we appreciate an owner's desire to keep his boat working, this proposal emphasizes management for a stable, viable longline fleet.
 - 1. Blackcod permit limited to permit holders fishing 1986 or earlier.
 - *a. Except that possessors of another Alaska limited entry permit are to be penalized 1 year in qualifying.
 - 2. Current subdivisions of the Gulf region and its quota are to be maintained to protect subpopulations.
 - B. The Bering Sea Region is impacted by longliners moving west from the Gulf and by intense targeted trawling.
 - 1. Blackcod permit limited to permit holders fishing 1987 or earlier.
 - *a. Except that possessors of another Alaska limited entry permit are to be penalized 1 year in qualifying.
 - 2. Blackcod catch regulations vis-a-vis trawlers, including bycatch and allocation percentages, should be brought into line with those on the Gulf over a three year period.

*Permit to fish blackcod on the inside waters of SE Alaska would not affect eligibility. Possessor of another limited entry permit would be allowed to give up that permit to qualify to fish blackcod.

- C. The Aleutians Region is really not overcrowded as demonstrated by boats leaving the area in the fall with the quota unfilled. In the past this area has been self-limiting by virtue of weather, distance, and isolation.
1. Blackcod permit limited to those permit holders fishing 1989 or earlier.
 2. Blackcod catch regulations to be gradually brought into conformity with those of the Gulf of Alaska over a six year period.

III. Besides limiting the number of permits, this plan calls for regulating the fishing effort per each license. Boat length does not accurately reflect ability to catch fish. Nor obviously do a skipper's savvy, knowledge, desire to work, determination, luck, etc. lead themselves to regulation.

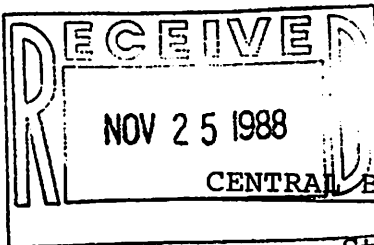
- A. We propose that permits be structured on a fishing-effort-unit basis. This would be directly tied to crew size and/or hooks fished.
1. Hand baiting permit holders and those using automated gear are to be treated the same.
 2. Crew size is calculated counting the skipper/operator as a crewman.
 3. One crewman equals 2000 hooks fished.
 4. Effort-Unit permits may be moved by the permit holder from boat to boat. Permits are also to be transferable on the free market in one man/2000 hook units between 2 men/4000 hook lower and 10 men/20,000 hook upper limits.
 5. For hand baiters, the number of effort-units allowed could be determined by crew liability coverage in the qualifying year or some other simple criteria.
 6. For permit holders who were already automated number of allowed effort-units could be decided by above means or at the permittees's option by appearing before a special determinations board with a log book or some other definite proof of number of hooks actually fished in qualifying year.
 - a. Determinations board could allow these permittees to fish fractional effort-units (perhaps in 500 hook increments). But only whole effort-units could be transferred on a free market.
 - b. Because of enforcement difficulties permit holders fishing automated systems are expected to be especially helpful in developing enforcement techniques and procedures.
- B. Since catcher-processors are difficult to monitor and contribute less to shoreside employment, this management plan calls for them to be phased out.
1. Phase out period in each area is 2 years for each year the permit holder operated as a catcher-processor previous to and including qualifying year.
 - a. If a permit holder operated a catcher-processor in 1985 in all three areas, he may operate for 4 more years in the Gulf, 6 more in the Bering, and 10 more in the Aleutians.
 - b. At permit holder's option, he could convert to strictly fishing in each area at the appropriate time.

2. In cases of non-owner operated vessels, vessel owners could appear before the determinations board to request an owner's permit which he could then assign to a hired skipper. (This same process would apply to purely fishing vessels that were not owner operated.)
 3. Total number of effort-units for catcher-processors to be decided by board on review of fishing logs.
 4. All catcher-processors to have observer aboard.
- IV. We recommend the longline fishery be separated into two distinct units.
- A. A directed fishery working against 80% of the blackcod quota in each area.
 1. Subject to the above modifications this fishery would proceed much as the present blackcod fishery does, but because of reduced total effort the season would last considerably longer.
 2. Season opening dates would be changed to; Gulf of Alaska--April 15, Bering sea--March 1, Aleutians--Feb. 1.
 3. Closing dates for each region and subregion determined by meeting quota.
 4. These permit holders allowed to land non-targetted species subject to current regulations.
 - B. A mixed catch fishery working against 20% of blackcod quota in each area.
 1. Vessel operators would need to choose this option each year before beginning fishing and to commit to this option for the whole year. Operators need to make an informed choice!
 - a. Managers need to publicize the total number of permits for each region.
 - b. They should also inform operators of permit distribution in the two types of fishery.
 - c. Permit holders to be allowed to decide anytime of the year which of the two fisheries they will participate in--as long as they have not yet commenced fishing.
 2. Mixed catch permit holders would be allowed to land up to 20% blackcod each trip calculated on a heads-off weight basis. Less than 20% blackcod and such a mixed catch fishery is of very doubtful economic viability.
 3. These fishermen would be subject to quotas on blackcod but also to quotas on those species making up the 80% of their catch; rockfish, turbot, greycod, dogfish, and others as determined by markets.
 4. It is strongly urged that 20% of the total allowable halibut catch be added to this fishery.
 - a. A permit holder would be allowed up to 30% per trip by weight of combined blackcod and halibut but no more than 20% of either.
 - b. This measure would encourage a prosperous, resident or local small boat fleet providing a steady supply of mixed fish of high quality over a long season.
 5. The mixed catch longline season to begin Jan. 1 in each area.

Jan Claypool
FIU Heccate
2154 B Street
Eureka, CA 95501



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



CENTRAL BERING SEA FISHERMEN'S ASSOCIATION

PO Box 88

St. Paul Island, Alaska 99660

November 22, 1988

Clarence Pautzke, Executive Director
North Pacific Fisheries Management Council

RE: Sablefish Management

Dear Mr. Pautzke,

Thank you for extending the comment period on the important issue of sablefish management. Central Bering Sea Fishermen's Association represents the fishermen of St. Paul Island. We have studied the EA/RIR/IRFA provided by NPFMC on management alternatives for the sablefish fishery, and would like to go on record with the following comments:

1) At present, due to the limited and seasonal capacity of our small vessel fishing fleet on St. Paul Island, there is no active involvement by our fishermen in the black cod fishery. This means that, as presented, the acceptance by NPFMC of any of the management alternatives other than the status quo, will likely result in total loss of access to the sablefish resource in the Bering Sea forever for our local fishermen. At the present time, we must speak against the imposition of management regimes in the Bering Sea that exclude the developing fisheries of the Pribilof Islands from future participation.

2) Pribilof Aleuts have been mandated by the US Congress to develop an economy based on the fishery resources of our Bering Sea region. Multimillion dollar government assisted improvements at St. Paul Island and St. George Island have been undertaken and are ongoing to support such an economy. Local fleets, as large as supportable under present conditions on our island, have been financed to train and develop our fishermen for taking an eventual full share of fishery resources from the rich waters of the Central Bering Sea. Only recently our community has begun installing new facilities to process multiple species, particularly longline and shellfish caught species. To tell us that we cannot share in the sablefish resource available over the Bering Sea continental slope (which passes just south of our islands) is to deny us a basic access and right to resources that belong to our people by virtue of centuries long residency in the Bering Sea.

3) As our history here in the Bering Sea well documents, the fleets of many nations have shared and disputed over the resources of the Bering Sea, in some cases to the detriment of Aleuts. At one time also, the fur seals were managed as a fishery. That fishery was closed to outside interests and "given" to Aleuts in 1984, only to be taken away for commercial purposes in 1985, causing great hardship in our communities. To live here, we must have realistic access to the fishery resources of the Central Bering Sea region.

4) The problems and difficulties in the sablefish fishery are well documented in the EA/RIR/IRFA presented by NPFMC staff. Clearly, the problems identified, which the alternatives seek to address, exist primarily in the Gulf of Alaska, and not the Bering Sea waters. The NPFMC manages many and diverse fisheries and waters. Not everything is the same in every fishery. Thus an opening exists for the NPFMC to adopt a management regime for the Gulf of Alaska, and delay any such action in the Bering Sea.

5) Under the IFQ and license limitations alternatives identified, none as presented, are viewed as favorable to Pribilof long term interests. We suggest that if IFQ systems are to be imposed in the Bering Sea by NPFMC, that Pribilof Island Aleuts receive a full entitlement share of quota in all species. Our local shares can then be, transferred, sold, leased or otherwise used to generate our full access and entry into the Bering Sea fishery. Except in some such scenario as this, we must strongly oppose IFQ systems as discriminatory, not in our best interests for the long term survivability of our communities, and directly contradictory to the mandate given our people by the US Congress to develop a local economy based on the fisheries of our region.

6) Our development in the fisheries has been slow to this point, and almost solely in the halibut fishery, thanks to the 5(c) exemption granted to our area in the 1982 Northern Pacific Halibut Act. With an incomplete harbor, small vessels, and no year round mooring basin, the options have been few without the large sums and financing necessary to purchase large vessels or factory catchers. But our fishery has taken root, and, as we stated, improvements and expansions are in the works on both the Pribilof Islands.

Aside from the natural difficulties, our fishermen and leaders have had a difficult time understanding the flow of regulations in the fishery. However, we certainly understand the shortcomings of a short opening fishery in a way that only small vessel owners can. We look with increasing concern at the increased appetite and trend

toward overcapitalization of the factory trawlers, and wonder about their impact on the resources of the Bering Sea, and whether we should be more concerned about their impacts in our rich Pribilof waters, where local resources must sustain us. This issue is of importance not only to Pribilof Islanders, but to all shellfish and longline fishermen who fish these waters.

7) Because we have been in the fresh market and are so far removed from the market, we have stressed quality in our local fishery. Better product enhances the fishery, pleases consumers, and returns more money per unit of effort to the fishermen. To address this concern we have worked to assure a longer season for our small vessels, through expanding the number of openings and using trip limits in our 4C halibut area. Many of the marketing and quality issues raised in the sablefish discussion by your staff have been addressed in our halibut fishery out of necessity. To this end we strongly suggest to the Council the use of extended seasons and trip limits as one means to achieve both better quality and higher returns, as well as safer fishing. The methods have been recently endorsed by Don McCaughran of the IPHC as effective tools in regulating a fishery, preventing overfishing and overcapitalization, and providing a more constant quality supply.

On behalf of Central Bering Sea Fishermen's Association, we wish the NPFMC wisdom and judgement to determine what is fair and equitable in the various fisheries under its jurisdiction. We hope that you will give some consideration to our comments regarding the black cod fisheries and other issues affecting us, and recognize that Pribilof Aleuts are serious in their efforts to develop an economy in our Central Bering Sea ecosystem.

Sincerely,

Perferia Pletnikoff Jr.

Perferia Pletnikoff Jr., President
Central Bering Sea Fishermen's Association

cc. St. George International
Gov. Steve Cowper
Senator Ted Stevens
Senator Frank Murkowski
Congressman Don Young

JVE
NOV 29 1988

Raymond J. Campbell
P. O. Box 2020
Kodiak, Alaska 99615

November 25, 1988

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

Gentlemen:

This is my response to your Environment Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for the sablefish management alternatives. Your study is a classic example of putting a study together to support your already formulated opinions and conclusions concerning the sablefish fisheries.

In the past, I have expressed to the Council that the reason for such an increase in the fishing effort for sablefish has been the threat of a limited entry system or another farfetched management plan that could deter the majority of the fishermen from the opportunity to even pursue sablefish as a viable fishery. The increase of the 1988 season over the 1987 season is an example of how the fishing pressure might decrease if the management is left open access. The fishing community is now in a position that if you don't fish, you will probably lose your fishing rights in the future.

In the summer of 1987, the Council solicited sablefish management proposals and received 59 proposals. In your study, you just seem to cover license limitations, I.F.Q., and by catch as the only viable alternative to the status quo. I personally came up with six alternative management plans. I didn't even see one mentioned in your study. I would be interested in some of the other 53 proposals suggested, or if the Council has considered a management plan that would not be a windfall profit give-away program to the old-time established fishermen that the Council seem to hold in such high regard.

The Council seems to justify the need for a new management system on the results of three surveys done by Dittman/Graystar, North Pacific Longline Coalition, and the North Pacific Fisheries Coalition. All of the surveys were sent to permit holders and processors -- the very people that will benefit the most from a limited entry scheme. In the past, I have brought this point up in the Council meetings. No surveys have included the crew members or fishermen not presently participating in the sablefish fishery. These are the people that will be hurt the most by being cut out so another segment of the

Page -2-
North Pacific Fishery Management Council
November 25, 1988

fishing industry can be assured an easy time of it by eliminating their competition.

This issue of limiting the sablefish fisheries' participation reminds me of the state's limited entry program for the Kodiak roe herring fishery. The Council is going to put a new management plan on the industry regardless of the desires of the fishermen, and it will most likely be as irreversible as the state's limited entry programs are now.

In the November 14th issue of the Kodiak Daily Mirror, former Chairman for the North Pacific Fisheries Management Council, James Campbell, was quoted as saying: "Too many people listen, but don't hear." I tend to agree with that quote. When the subject of the North Pacific Fisheries Management Council is brought up among fishermen, the concern is they don't hear or even try to listen.

Sincerely,



Raymond J. Campbell

RJC/kkr



Cresting Wave Seafoods, Inc.

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.

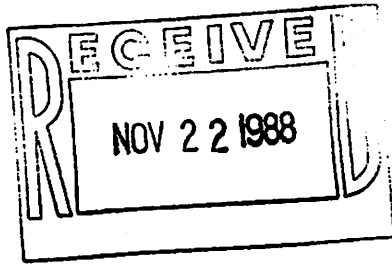
We are quite concerned that without firm control in this area, we are going to see in the future a heavy concentration of juvenile Sablefish harvested in Alaska, much like what we see in Oregon and California today.

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 Oono
President

YO:ct



11-17-88

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

Dear Sirs,

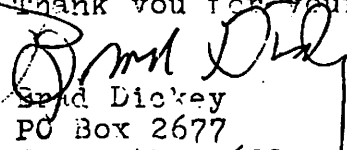
Please consider the following comments on the longline Sablefish fishery off Alaska:

- 1- Due to safety and management considerations, the status-quo is not an option
- 2- A combination system with Ind Fishing Quotas, Lisc limitation and a multi species longline fishery is a must:
 - A- Many of the same boats fish Halibut, sablefish and pacific cod- it would be most efficient to be able to deliver all three on any given trip to prevent loss of non target species and to make it economically possible to fish pac. cod.
 - B- You are going to have to deal with the halibut fishery very soon- and a multi species approach makes sense.

In order to make a multi-species approach work- the following modifications must be made to your IFQ and lisc limit sheets-

- 1- IFQ- (see attached) smaller threshold- 300 lbs so that Halibut fisherman can keep salbefish.
- 2- Lisc limit- also a smaller threshold- 300 lbs- for same reason. Also even small quantities should be eligible for lisc- this will make multi spec possible without waste -it will permit smaller local boats to buy enough quota to keep them fishing on more of a year round basis, which will yield a better price due to better handling on boat and shore- more fresh unfrozen product on market.

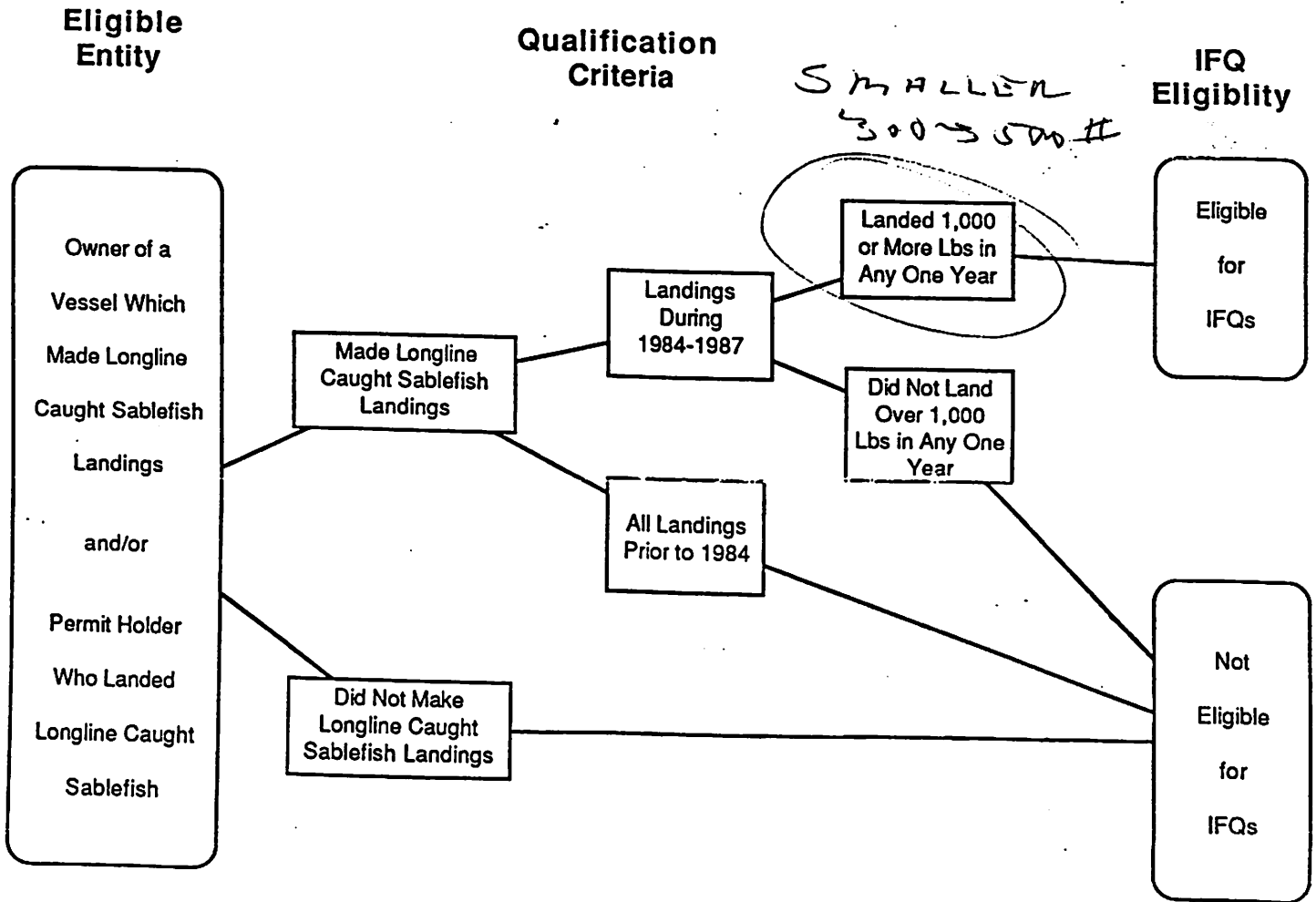
Thank you for your consideration,


Sam Dickey
PO Box 2677
Homer, Ak 99603

cc Tony Knowles

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

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

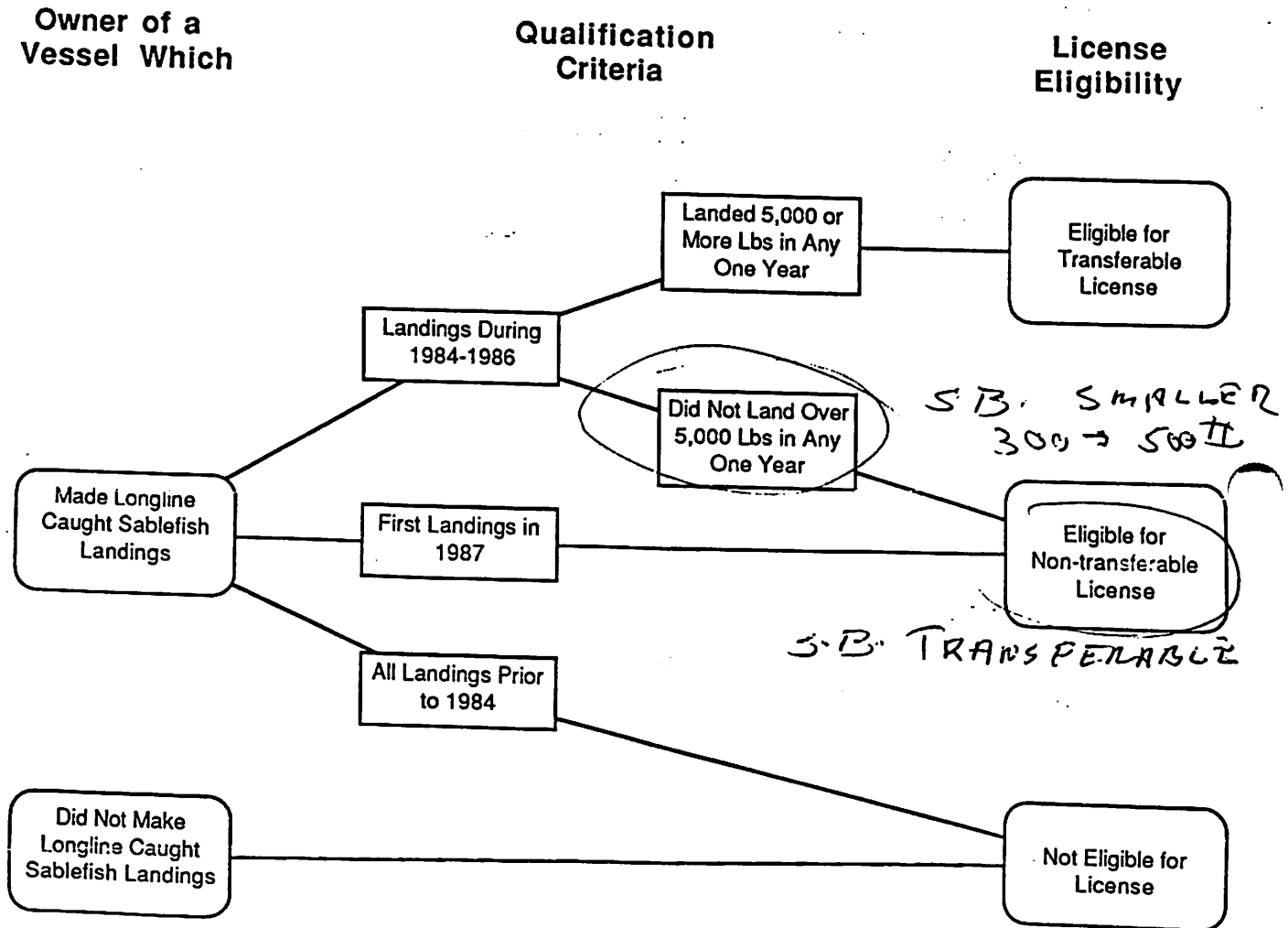


- MANAGEMENT AREAS**

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

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



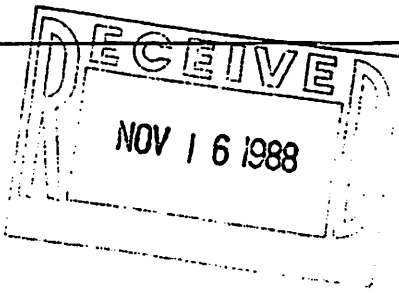
MANAGEMENT AREAS
Gulf of Alaska
Bering Sea
Aleutian Islands

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.

Fish Works!

Fishermen's Terminal
C-10 Building
Seattle, Washington 98119
(206) 283-7566

November 14, 1988



John Petersen, Chairman
North Pacific Fishery Mngt. Coun.
POB 103136
Anchorage, AK 99510

Dear Mr. Chairman:

I am enclosing for the Council's review a discussion of the Chatham Strait sablefish fishery which appeared in the November, 1988 Alaska Fisherman's Journal. In the past five years, a number of articles critical of "derby" style management have appeared in various fishermen's publications. The Chatham sablefish fishery is not under Council jurisdiction, but the issues are similar to those involved with the sablefish fishery in Council waters.

I refer you to the underlined sections of Susan Ewing's article. In summary:

1. The number of participating vessels has tripled since 1984.
2. The number of hooks per vessel has tripled.
3. Harvesting efficiency has increased substantially.
4. The length of the season has been reduced from 2.5 months to 24 hours.
5. Despite the 24-hour opening, the quota (1.5 million lbs.) was practically doubled (206 million lbs.)
6. License limitation results in more, rather than less, effort and especially more gear.

Needless to say, the amount of fresh Chatham Strait black cod available to the domestic market from a 24-hour season is extremely limited.

What do we want the sablefish fishery to look like in 5, 10, or 20 years? We need durable, long-term management strategies that will stand the test of time. I ask the Council to reject short-term management schemes.

The status quo is not a management option for the sablefish fishery. Also, it should be obvious from reading the enclosed article that

John Petersen
November 14, 1988

Page 2

license limitation creates as many problems as it addresses and does nothing to alleviate the short, derby-style openings or the dangers associated with inclement weather during such openings.

Given current patterns of investment and opportunism in the fishery, combined with a more efficient and mobile fleet, I respectfully submit to the Council that the IFQ system is the only sensible long-term solution. Divide up the quota among the fishermen based on past participation, eliminate seasons entirely except for reasons of conservation or quality, and let the harvesting sector work together with the market to determine the best time and way to fish. Fishermen would tend to fish when and how it was economically advantageous. Future technological improvements would then be geared to upgrade quality rather than to increase speed and hold capacity.

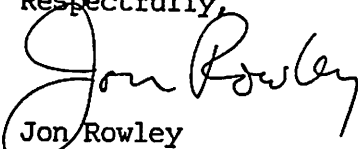
IFQ management is without question the best system for the US consumer, food service, retail, and distribution sectors. What is good for the market is ultimately good for the fishery and the country.

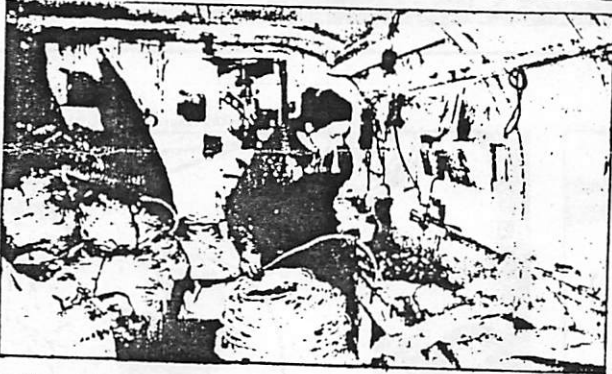
An IFQ system would also favor an orderly development of domestic markets, especially for fresh sablefish. It takes a certain availability of high quality fresh product on the market to open up a strong frozen market.

A multi-species IFQ system would minimize by-catch problems and assure a continuous supply of several species to the market place.

The Magnuson Act is very clear as to the Council's responsibility to consumers. I urge the Council to keep this responsibility in mind when formulating a management plan for sablefish and other species.

Respectfully,


Jon Rowley



Chatham Sablefish Crap-shoot Nets 2.6 Million Pounds

by Susan Ewing

Imagine the fish-eye view as 155 boats up and down Chatham Strait

let go all the gear they could gamble on a 24-hour season. Welcome to the Southeast blackcod derby.

The 1988 Northern Area Sablefish (blackcod) fishery, which in-

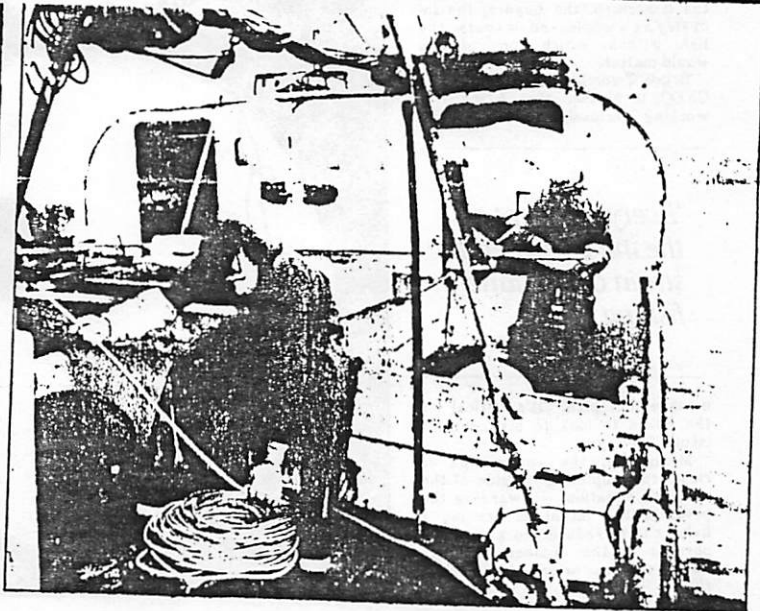
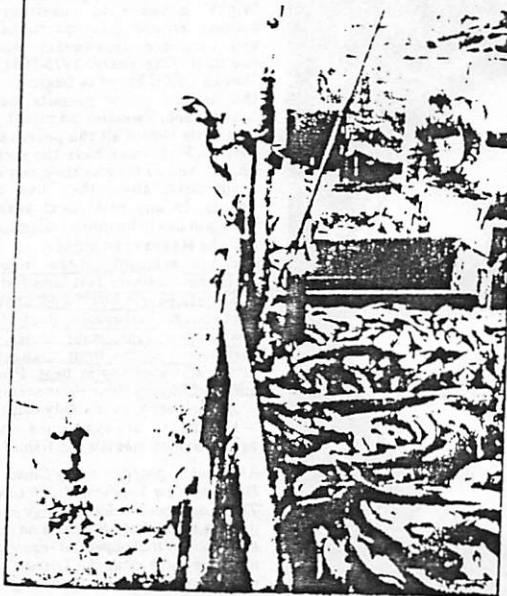
cludes districts 9, 10, 11, 12, 13c, 14 and 15, opened for 24-hours at noon, September 19. Skippers and crew held their collective breath as they plunked down their bets.

"I'll bet 20,000 hooks I can lay 10 miles of longline at 360 fathoms and pull it all back up with fish on between now and this time tomorrow." Some win, some lose. Since 1985, only a few get to play.

The Southeast sablefish season has been limited in one way or another since 1980. That was the

Thea Patten (above), second-year longliner and "forever" fisherwoman, baiting skates and singing the praises of a 30-pound blackcod; brother David looks on. Skipper Tim Martin alternates between meditating on the Chatham Strait chart and munching a sandwich in the wheelhouse of the Triaha C.

first year fishermen had to work around a shortened season. "Short" then was two-and-a-half months—September 1 to November 15. The season was reduced each year, until



by 1984 it was down to four days. That season, 73 boats delivered blackcod. That year they also delivered a message to the Commercial Fisheries Entry Commission. Concerned about increasing season restrictions, Southeast blackcod fishermen petitioned the CFEC to explore limited entry for the fishery.

After researching catch records, consulting with Fish and Game managers and talking to fishermen,

the CFEC determined that limited entry was the way to go. The commission placed a moratorium on southeast blackcod permits beginning with the 1985 season. Any boat that had ever delivered sablefish could get an interim use permit until commissioners waded through the official process of limiting the effort.

Meanwhile, the price of blackcod went up. The Japanese, feeling the

standing with their toes on the 200-mile line looking to buy sablefish. Domestic markets for the rich, white-meat fish were also developing. Smiling sample vendors offered bites of blackcod steamed in white wine at yuppie markets on both coasts.

Driven by better prices and the expectations of a limited entry permit, boats came out of the woodwork

Twenty hours after the first set (left), skipper Tim Martin gets ready to pick a fish at the roller while Scott Sargraves cleans. David Patten coils gear.

1980 and 1984, there were about 50 boats working the fishery. In 1985, the first year of interim fishing, 112 boats fished. That number increased

boats competed for the best sets. Not only has the fleet become larger, but the individual vessels have increased their catching power.

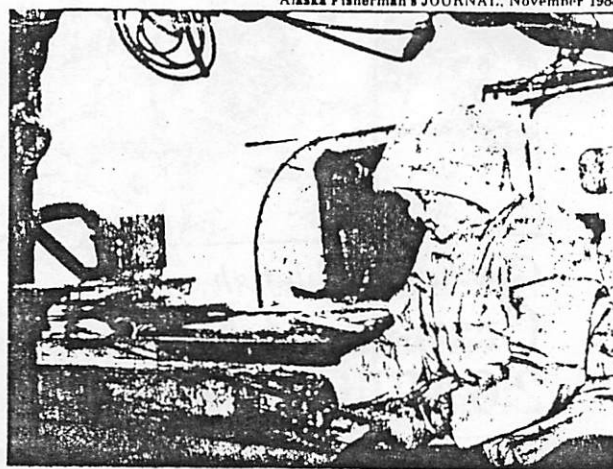
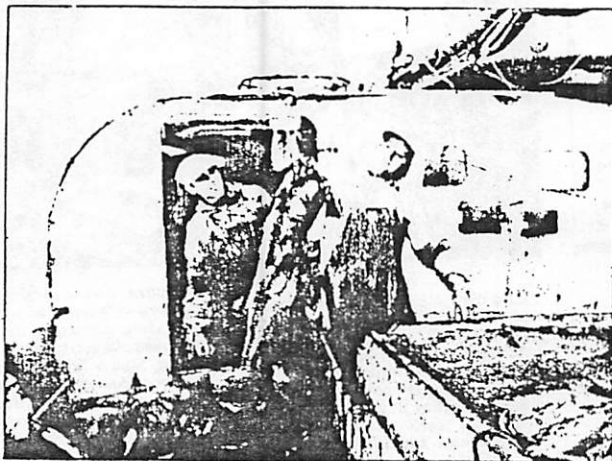
These 155 boats are a lot different than the boats that worked Southeast blackcod in earlier years. Today's boats run more gear, handle the catch efficiently and use more sophisticated electronics. The number of hooks per vessel has tripled. The fish, and ADF&G, have noticed.

Although the quota is 1.5 million pounds, nearly twice that amount has been delivered for the last three years. This year's 24-hour catch was nearly 2.6 million pounds.

Barry Bracken, ADF&G's Southeast groundfish project leader, believes the blackcod population can probably maintain this kind of pressure in the short term, but he notes that studies indicate current fishing levels are above the long-term sustainable yield. According to Bracken, the sablefish population declines following years of harvests greater than 2 million pounds.



It's a safe bet that as soon as fishermen hit the dock they're on the phones to lovers, brothers, mothers, bankers, buyers and bankers. Tim Martin (right) places a call to one of the above from a phone booth in Ketchikan after the opening.



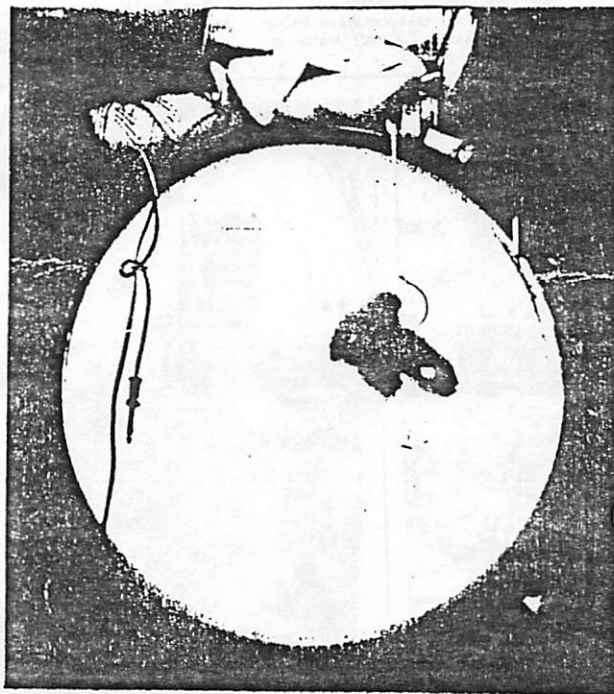
ADF&G is working out a blackcod management plan which they hope to present at the Board of Fisheries meeting in January. The plan will be an attempt to address the needs of the fishermen, the buyers, the industry as a whole, and of course the fish, without which none of this would matter.

Bruce Twomley, chairman of the CFEC, is pleased that ADF&G is working seriously on a sablefish

'Every segment of the industry feels the strain of fast-lane fishing.'

management plan. "It's critical for the Board to look to management issues," he says.

Meanwhile, the commission is closer to completing its side of the blackcod equation — awarding the permits. The intent in limiting a fishery is to reduce the number of permits to the number of boats fishing the year prior to the moratorium.



In the case of Southeast sablefish, that means a target number of 73. The commission developed an application that awards points for the "right" answers to questions revolving around past participation and economic dependency during the qualifying years, 1975-1984. Although CFEC hopes to begin issuing the limited entry permits before next season, Twomley admits it may be awhile before all the permits are settled. Fishermen have the right to appeal, and as long as they can keep their claim alive, they can keep fishing. In any case, next season's field will likely be quite a bit smaller and the stakes even higher.

Every segment of the industry feels the strain of fast-lane fishing. It's Alaska-style boom and bust for everybody. Fishermen push their boats, their gear, their crews, and themselves to the limit. Dangerous at worst, unhealthy at best. Processors and buyers clear their scales.

At the derby, everybody can't win — somebody always goes home broke. Sometimes it's the fish. □

After coiling gear (top right), David Patten hoists a 30-pounder with sister Thea's approval. A whale effigy in the galley window had little effect on the killer whales that appeared regularly for a free lunch while the Trisha C was fishing blackcod in the Bering Sea.

**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. 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 skips 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 corporation 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 ITQ'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 bankrupt 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."

Sablefish comment received by telephone, 10/27/88:

I want a continuation of open access but would like to see it changed a bit. The changes I propose are that on January 31 or so, the quota would be divided among all permits holders based on the net tonnage of their boat (anyone would be able to get a permit). Fishermen could then fish any time during the year.

If we go with limited access, we must use the most recent year(s) landings. Otherwise it would not be fair to current participants. Don't go too far back in time to get fishing history, either.

I do not agree with limited access.

Joe Hess
Sterling, Alaska longliner

COMMISSIONERS:

LINDA ALEXANDER
PARKSVILLE, B.C.

DENNIS N. BROCK
OTTAWA, ONT.

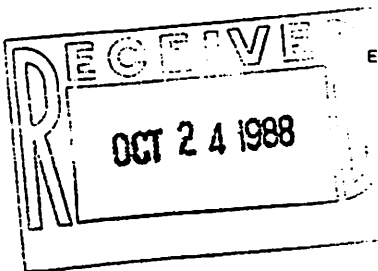
RICHARD ELIASON
SITKA, AK

JERT W. MC VEY
JUNEAU, AK

GEORGE A. WADE
SEATTLE, WA

GARY T. WILLIAMSON
SURREY, B.C.

INTERNATIONAL PACIFIC HALIBUT COMMISSION



ESTABLISHED BY A CONVENTION BETWEEN CANADA
AND THE UNITED STATES OF AMERICA

October 19, 1988

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
P.O. Box 103136
Anchorage, Alaska 99510

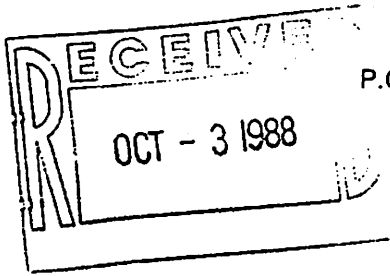
Dear Clarence:

Our recommendation for management of the longline sablefish fishery off Alaska has not changed from our letter of September 13, 1988, which contained details of our position. We strongly support the IFQ option as our first choice, and believe that this option will help solve many problems in the fishery. If the Council cannot approve IFQ's, we feel that the combination of IFQ and open access is by far the best second choice. This combination will allow rational fishing for the many fishermen who prefer ITQ's, but let those in opposition continue with open access.

Sincerely yours,

Donald A. McCaughran
Director

RJT:ps



CITY OF KING COVE

P.O. Box 37 • King Cove, Alaska 99612 • (907) 497-2340

September 27, 1988

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

RE: Sablefish Management Alternatives

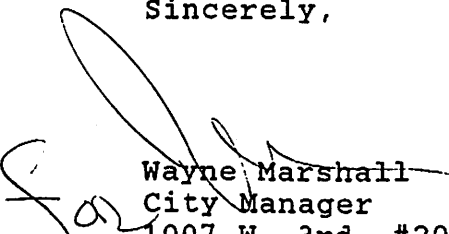
Dear Council Members:

The King Cove Council has reviewed the Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for sablefish management alternatives report. The Council supports returning the open access management approach as the best option to enable King Cove resident fishermen to participate in the fishery under current management approaches. The City Council previously stated its support of the open access entry approach in City Resolution 88-14, which the Council adopted in January 1988 and submitted to the NPFMC.

Most King Cove fishermen are only recent entrants to the sablefish fishery and their continued and future participation in the fishery will be severely threatened if a limited access option is adopted. The City also believes the Council should consider the concept of a community share quota system in implementing a management approach. In short, the community believes that a goal in fishery management should be to provide all opportunities for fishermen located near the resource to directly participate in and benefit from the fishery.

The City supports retaining the open access fishery for sablefish.

Sincerely,


Wayne Marshall
City Manager
1007 W. 3rd, #201
Anchorage, AK 99501
274-7555

NOV 23 1988

November 21, 1988

Scott Landis
837 N. Jacob Miller
Port Townsend, Wa.
98368

Mr. Clarence Pautzke
Executive Director, N.P.F.M.C.
P.O. Box 103136
Anchorage, Ak. 99501

Mr. Pautzke

I am unable to attend the up coming meeting on December 9 where among other things you will be discussing the limited entry issue for Black Cod. I am totally in favor of limited entry and hope you are able to institute something before this fishery ends up like the Halibut one.

There are many reasons to do this. The gear conflicts being one of the major ones. Too much gear is left fishing because of conflicts due to overcrowding. Actually this is the real problem. Too many boats.

I would like to see a reduction to the number of vessels. One way to do this is issue permits to boats according to size and allow fishermen to buy additional poundage from other boats. Allocate poundage according to past production. If a fisherman decides to sell his quota he also sells the right to fish. He can not keep a portion of the quota which could be used on opening day when the pounds per hook is greatest, the most boats fishing and the most gear lost. If any of the ITQ is sold all is sold.

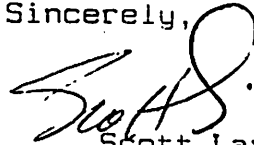
I have fished my own boat for halibut since 1975 when the season opened mid May and continued into September and we layed up. I did not direct my fishing effort on Black Cod until 1984. You know I would not mind being cut out of the Black Cod fishery as long as I had a way in. The legal means to buy in. Management would be so much easier without the abounding boats. Who knows how much of the quota is left on the bottom hooked? I watched my last end of my first set of the season last Spring break off in the hands of an inexperienced boat with which it was tangled. I estimated a minimum of 5000 lbs lost and it could very well have been 10K. It was my first and it would have been my best set.

or without
With limited entry on longliners you must address the factory trawler issue. At least get observers aboard so any incidental catch of black cod is counted on their quota.

God what a mess they are. With three trawlers working the grounds I used to share with the Japanese longliners I had the worst halibut fishing ever. I am moving away from this area after eight years of having excellent fishing.

I appreciated your response to my letter I sent earlier concerning this dragger issue. If there is anything I can do to help in instituting limited entry please let me know. I am in favor of limited entry in both black cod and halibut.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Landis". The signature is stylized with a large, looping initial "S" and a cursive "L".

Scott Landis

Queen Anne Fisheries, Inc.
1939 Eighth Avenue West
Seattle, Washington 98119
(206) 284-9158

F/V MASONIC
Mark S. Lundsten, Operator

November 22, 1988

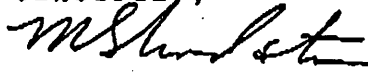
Mr. John G. Peterson
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, Alaska 99510

Dear Mr. Peterson,

Enclosed please find an editorial I have written for the Alaska Fishermen's Journal that I think is relevant to your deliberations on the Black Cod issue at the December meeting.

I have also sent a copy of an article from The New York Times that explains, somewhat ominously, the condition of another area's fisheries that have "developed" a little further than our own. Thank you for your consideration.

Sincerely,



Mark S. Lundsten

The North Pacific fishing industry is heating up. Fishing and political pressures are building every year, and management wields less and less control over the situation. The root of our current problems is the phenomenal growth of fishing power at every level of the domestic fleet. We simply are overloading our management systems and threatening to waste our resource, both on the grounds and in the marketplace.

This winter the Council will decide whether or not to pursue any kind of effort limitation in the black fishery. In light of the Future of Groundfish Committee report, it is an excellent "test case", an opportunity for industry and the Council to move away from reactionary "crisis-style" management and at least partially toward a more preventive, long-term approach.

Clearly, for most of us in the bottomfish fisheries of the North Pacific, the last number of years have been a boom. The yen (in which denomination most of us are paid, essentially) has been strong, most stocks have been strong, and some fisheries have not even been fully "Americanized". Lots of people have done very well lately.

At the same time, management has had to decide more and more, on an annual basis, about problems that so far have no solution. Every year we have a set of the same family of crises: crab and halibut bycatch in trawls; gear conflict between any two among trawl, pot and longline; a need for allocation of a certain resource to a gear group or community (or other country...); another fishery becoming overcrowded; and every year we seem to discover that some growing fishery somewhere is taking, intentionally or unintentionally, too many illegal fish. Plus, of course, enforcement and the scientists who are supposed to count the fish have more and more work handed to

them all the time.

Last winter I was a member of the FOG Committee, with a diverse group from the industry who more or less shared my view that a "problem" exists in the North Pacific. We had no predetermined agenda or common point of view. But, besides the more specific points of the FOG report, I think we had a consensus that I will try to summarize without taking too many liberties:

Times are good, or perhaps merely propitious, because of the certain set of conditions of "Americanization". Our future should be prosperous, considering the resources available. But the current prosperity is not only problematic for management, it is also quite probably temporary unless we can exercise, as an industry, some self-control we've yet to find. (We did read case after case of fisheries all over the world that bore out the pattern of growth and overcrowding, boom and bust.) The difficulty is that for every solution, it seems that a whole new set of unknown problems seem likely to arise. Or to put it another way, we just don't know what any of these future scenarios really would be like.

Council members are currently steeling themselves for the annual December shootout when that intractable case of black cod effort will come up again. Unfortunately, the FOG report did not detail any neat packages or tidy solutions. But it did raise essential issues that the Council should consider in their decision.

First, too much fishing power is a threat to the health of the resource itself, regardless of management systems that set annual catch quotas. This is exaggerated when "Olympic" or "Derby" fisheries have high catch rates and short openings. Not only is prohibited species bycatch harder to track, the waste of the target species is as well. Further, any sensitive fishing ground may be

unwittingly hammered so hard in a short period that it may take years for it to recover. Mainly, though, as fish stocks may rise and fall and rise again, a banker's demand for payment remains constant. If the total allowable quota is too small to reasonably handle the total debt of the fleet in any given year, we are in danger of enormous political pressure to allow overfishing to occur. I'm afraid we might condemn ourselves to a future of continually depleted stocks with a fleet that's too large.

Second, crowding breeds a waste of the resource in the case of groundfish. I know well the mentality of a 24-hour opening; and when push comes to shove, as it often does, quality of product and conservation are not top priorities. All too often, as the records of the Coast Guard show, sadly enough, safety of the vessel and crew are not either. A fisherman in a "race for fish" has to be a fisherman without much of a conscience in order to succeed.

Finally, jamming the grounds with boats for a short period of time is not cost-effective. If we are trying to make the U.S. industry competitive in world markets, the present condition of the halibut fishery is a great example of what not to do. Not only are many fish wasted and the quality of product inferior to what it should be, but also market opportunities are missed with the sporadic availability of product. Plus, the amount of money and effort poured into one halibut opening with fuel, refrigeration, storage, and overtime costs is much more than necessary for the amount of product. In the most extreme capitalistic case of limited entry, if a Texaco or an AT&T "owned" the halibut resource, they would certainly not organize a derby as a cost-effective means to bring the fish to market.

The "causes and effects" of fisheries management I'm discussing

are certainly nothing new. But they are pressing issues to me right now, and relevant to the question of black cod effort limitation this December, and to the larger question of groundfish effort this coming year.

We can go on allocating the resource, Council meeting after Council meeting, through a patchwork of political bloodshed and "deals" just as we've done most often lately. We can keep on trying to manage every crisis after the fact, time after time. And, as many romantics love to proclaim, the highliners probably will still be highliners. But I think the continuation of the status quo will turn the North Pacific fisheries into a predominantly rag-tag industry, probably still a living for the hardest drivers and the most clever ones, but not one to take much pride in, and not one known for quality. Many who favor the continuation of the status quo uninhibitedly are those who, despite their protestations of the American Way and so on, simply have something to gain from furthering the chaos.

The Council should limit effort on black cod as a starting point for the whole groundfish complex, including halibut. The black cod system could be a form of permits or so-called ITQ's. Or it could be a combination of open access with either one. Whatever it is, it should definitely be a system which could be incorporated into a comprehensive plan for limiting effort throughout the groundfish fishery.

We should make a start now. We have the resources at hand. And, more important, we also have the resource at stake.

Intensifying Competition

Northeast Fishermen Catch Everything, And That's a Problem

THE NEW YORK TIMES,

SUNDAY, NOVEMBER 13, 1988

By JENNIFER A. KINGSON

BOSTON

USING new technologies to supplement their ancestral "sixth sense" about the sea, New England fishermen can catch more fish now than ever before. But greater efficiency has become a curse for the fishermen, who have seriously depleted the region's prime fishing waters, Georges Bank and the Gulf of Maine, raising questions about whether those waters can ever be restocked.

Faced with these problems, many fishermen are criticizing the way the industry is managed while scientists and biologists lament the possible extinction of species. While officials devise plans to limit fishing at spawning time, equipment manufacturers create easier ways to catch fish.

"We have a harvesting capacity much greater than there are fish to be harvested," said David S. Crestin, chief of the fisheries management division of the National Marine Fishery Service office in Gloucester, Mass. "They're just not giving the stocks a chance to rebuild."

From 1977 to 1987 at Georges Bank, there was a 53 percent decrease in the stock of Atlantic cod. At the same time, increased competition and more efficient fishing techniques caused the annual catch to rise from 27.4 tons to 34 tons. As with the cod, stocks of haddock, flounder and pollock also declined significantly, according to Vaughn C. Anthony, chief of conservation at the Northeast Fisheries Center at Woods Hole, Mass.

The dearth has come as a shock to New England fishermen, who thought their problems were over when a law was enacted in 1977 that extended the country's exclusive fishing rights to 200 miles off the coast and set up regional councils to organize the industry.

The 200-mile limit silenced complaints from fishermen that Russian, Polish and Canadian boats were greatly depleting their fish stocks, and temporarily eased fears that New England's lobsters, herring and halibut would be fished to extinction.

With foreign boats banished, high expectations for American fishing drew an infusion of private capital. Some people in the industry believed the Northeast's fishing fleet

could be built up to rival the fleets of countries like Canada and Japan. Processing plants were built and modernized, and steel boats replaced rickety wooden trawlers. The new boats hold more fish and use electronic systems to navigate and locate fish.

The newest fishing gear was on display last month at an exposition in Boston, where manufacturers showed off video plotters that generate navigational charts, electronic monitors that tell how many fish have been caught and ship facsimile machines. Fish finders can now display not only sections of the ocean but water temperature and boat position as well.

Futuristic Fleets

"The rapid growth and modernization of the fleet on the East Coast just simply was too much too soon," said Guy Marchesseault, head of the New England Fisheries Management Council. None of the conservation tactics the council has used — from trying to promote less popular fish species to limiting the amount of fish that can be caught on a single trip — has been able to counteract the effects of technical improvements.

Industry experts say that radical measures are needed to reverse the trend. One Federal official suggested that the only way to restock the waters would be for the Commerce Department to close the fisheries temporarily. A more realistic option now under consideration is a stricter limit on the number of fishing permits states can issue.

The New England Fisheries Management Council, established in 1977, has closed spawning areas, raised the minimum size of fish that can legally be caught and required a larger mesh size on nets. But the large mesh does not insure that young fish swim away, fishermen say, and most of the enforcement of regulations must be done at sea, a difficult and costly task for the Coast Guard.

Although fishermen know the waters must be restocked, competition is so fierce that few have qualms about evading the regulations. "There is no incentive to conserve," said Mr. Crestin of the National Marine Fishery Service.

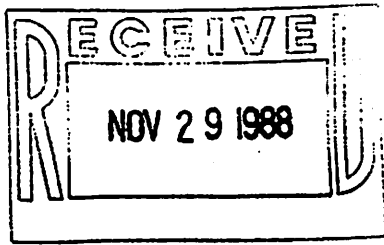
Some in the industry say that scientists are being unduly pessimistic, noting that fears about the scarcity of fish are not new. "Everyone is screaming that fishing is a dying industry," said Molly Benjamin, a fish-

erman in Provincetown, Mass., who reports on the industry for the Cape Cod Times. E she said, fishermen "have been seeing the headlines for 200 years." She said that fishermen she knows are minimally concerned about their dwindling catches, while they admit that the appearance of more juvenile fish on the market is a problem.

Still, most industry experts say that current slump cannot be passed off as a cyclical dip in the fish population. Jim Kostakes, head of the Seafood Producers Association in New Bedford, Mass., said that dearth is more severe and promises to last longer. "Up until a few years ago, nobody gave a second thought about the resource

he said. "They would say, 'The coast is gone' and walk up the street."

Mr. Kostakes said that a few boat operators in New Bedford, the home port to boats, have gone out of business, and more are expected to falter. He added, "I know hearing about new boats being built and I shake my head in awe."



445 Front Street
Ketchikan, Ak 99901
November 28, 1988

MEMBERS:

North Pacific Fishery Management Council
605 west 4th Avenue
Anchorage, Alaska 99501

re: Sablefish longline fishery management proposals

I have written before and I think I have clearly stated many arguments in favor of an IFQ system: increased efficiency of fishing operations, increased safety, less gear and dead fish left on the grounds, legalization of incidental catch, higher quality product, higher profits, more dispersed fishing times and lower prices benefitting the consumer, etc. I hope that you have listened to my and other fishermen's testimony in this direction. The council made a commitment to make sablefish a limited access fishery before the 1989 season, so we are looking forward to a decision.

In this letter I would like to debunk some of the arguments AGAINST an ITQ type system.

I) Some fishermen say that an ITQ system would make it harder for newcomers to enter the fishery. Let us compare Open Access with ITQ and see which system is in fact easier to get into.

OPEN ACCESS

- short openings make it hard to learn a new fishery, there is less time to smooth out your operation
- In very short openings (e.g. halibut, and it might come to balckcod too!) if you miss the fish tough luck!
- Because the length of the openings is limited, a bigger boat is the best way to maximize the opportunity (it can fish rougher weather, and make longer trips) bigger boats require larger amounts of capital
- The present system requires massive amounts of gear to be competitive. I have seen boats

ITQ

- Longer openings make it easier to learn a new fishery, it may take a newcomer longer, but he doesn't lose his chance to harvest his quota by being slower
- With longer openings you have time to find fish
- A bigger boat is less necessary, as weather can be waited out, and short trips do not limit the opportunity to catch fish. In fact larger boats may NOT result in the highest benefit/ cost solution. smaller boats mean smaller capital requirements
- The benefits for larger amounts of gear are there, but they don't determine how many fish are

change from 60 skates to 400 skates in four years !!

-Because the time is limited you must fish no matter what the weather is

-The permit costs are nominal

caught thus allowing the newcomer to get started with less operating capital

-The newcomer does not HAVE to fish bad weather. participants do not sacrifice total amount caught by being cautious while they learn the area and the weather

-The quota costs are not free, but they could hardly be called prohibitive. Small quantities can be bought making it easy to get started. Also quota could be leased for one year minimizing initial expense.

-Additionally there are other ways to ensure that the fishery continues to be easy to get into. An ITQ system can be combined with an OPEN ACCESS system, or a % of an ITQ quota can be put up for auction or lottery each year

-If the quotas are freely transferable money can be borrowed on them, eliminating the difficulty we have with some limited entry permits.

As you can see, I do not believe that an open access system is easier for a newcomer to get into. I firmly believe that its much better to buy into a well managed fishery than to be able to get into one for free that isn't worth a darn. It all comes down to the old saying, "There's no such thing as a free lunch".

II) Some fishermen believe that an ITQ system does not reward the traditional longliners fully for their effort and investment. They propose a limited entry system with permits graded by boat GRT. Actually their concerns are better met through an ITQ system.

THE ORIGINAL DETERMINATION

LIMITED ENTRY PERMIT

-GRT is somewhat arbitrary. If I have a 69 ton boat and you have a 70 ton boat, you get a more valuable permit than I. This happens whether or not I catch more fish, my boat is a more expensive better equipped

ITQ

-Permits based on catch are more flexible. If I caught 100,000# and you caught 101,000# you would be awarded 1 % more quota than I. In this way long time participants could still continue at their existing level.

boat, or I fish 100 days of the year and you fish 30. Those things don't matter, you still get the better permit. The numbers can be manipulated This makes the original determination less likely to be "fair" even on the arbitrary scale of GRT

Highliners with smaller boats would not be penalized because they used a small boat. Fishermen who fished long seasons and caught more fish would be rewarded with more quota

THE LONG TERM OPERATION OF THE FISHERY

LIMITED ENTRY PERMIT

-This would not stop the shortening of the season. This has been seen in BC where despite increased black cod stocks and limited entry the seasons have still dropped drastically. Shorter seasons mean traditional longliners may have to go to other fisheries to justify boat expense

ITQ

-This WOULD stop the shorter seasons. There is little reason for seasons with ITQ. Therefore ITQs offer greater protection for traditional longliners. Additionally fishermen could even buy more quota and fish longer to increase their annual catch if they so chose. This system offers the greatest opportunity for those who want to maintain longlining as their sole type of fishing.

III) Some fishermen say that competition is an essential element to the fishing way of life, and ITQs eliminate competition, thus destroying a way of life.

OPEN ACCESS

-Competition to see who can catch the most amount of fish in the shortest amount of time, independent of cost, quality, safety, efficiency, etc.

-The public pays for this "right to compete" with lower quality, higher prices, decreased availability, and higher insurance costs

-Our increased costs of operation due to trying to catch a larger share of the TAC reduce the marketability of our product

ITQ

-Boats that catch fish faster are still rewarded by higher income per unit time, and additionally there is competition to maximize income by increased quality, and minimizing expenses of operation

-The fishermen may lose some of his "right to compete", but he would gain income per \$ invested

-If we are more efficient our product will be more competitive on the world market. Instead of competing amongst ourselves we can focus on our competitive position in the world.

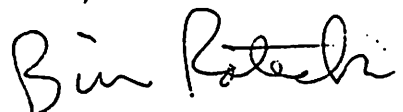
The social and financial costs do not justify maintaining the

competition for "who gets to catch the most fish". If we find it socially necessary to maintain that as a lifestyle, I think it should be voluntary, not enforced. Reserving a portion of the TAC for open access and a portion for ITQs is totally workable. I have no desire to sacrifice my income and sacrifice a publicly owned resource to satisfy some vague competitive urge. If the urge hits, me I can always play racketball. In the meantime I know that I can harvest higher quality fish for lower cost with less waste of the resource and greater profits with a well-designed ITQ system.

IV) Critics of the system fear that quota would ultimately be concentrated in the hands of a few, thus allowing major players to dominate or manipulate a fishery.
-this fear is ungrounded as limits of ownership can be designed to meet a variety of goals. Proponents of the system frequently recommend a 1% maximum ownership of quota for sablefish in any management area.

There are a few things wrong an ITQ system, and a lot of things right with it. Please, please, out of respect for the public, for the habitat, for the fish stocks, for the fisherman, and for the processors, institute a combined ITQ and open access fishery as soon as possible.

Sincerely yours



Bill Rotecki

cc Alaska Fishermens Journal

cc FVOA

cc Deep Sea fishermen Union

445 Front St
Ketchikan
October 12, 1988

MEMBERS:

North Pacific Management Council
605 West 5th Avenue
Anchorage, Alaska 99501

r.e. Sablefish management

My name is Bill Rotecki and I live at 445 Front Street, Ketchikan Alaska. My principal source of income for the last four years has been longlining for Sablefish, and I hope to continue fishing for sablefish for another twenty years. Needless to say, I am very concerned with the decisions to be made here about Sablefish Management, and I would like to make some statements in favor of adopting some form of an Individual Transferable Quota (ITQ) system.

The management system that we have at present has many inherent problems. Incidental catch is a tremendous problem today in all bottomfish fisheries. Boats in every gear group catch prohibited species resulting in dead but not harvested fish. Boats can target on bycatch, because there are no adverse repercussions for exceeding their quotas. Longliners set more gear than they can pick up in the allotted time, and suffer tremendous gear loss due to overcrowding, resulting in dead but not harvested fish. The net result of these problems is the unnecessary wastage of a resource, and the increased costs of harvesting and processing fish which reduces profits for those involved and increases prices to the consumer. These are some problems, but what are our goals?? I believe that the PRIMARY goal of the Council's decisions should be proper maintenance of the resource. If we don't maintain healthy viable fish stocks it becomes senseless to discuss optimum utilization, development of underutilized resources, promotion of economic growth of maritime communities, or other goals.

There is no doubt in my mind that the best management technique for optimizing the biological yield of bottomfish is some form of ITQ system. An ITQ system is the only one that allows for integrating management of a variety of species, and ultimately integrating harvests of different species is essential to good bottomfish management. Because bycatch can become legal, it will be kept and reported, thus reducing the wastage and giving far better biological data resulting in better management. Catch can be kept much closer to the optimum harvest levels, because catch is determined by quota set, not period of fishing. Because amount of catch is predetermined, managers do not have to continually devise methods to decrease the efficiency of the

fishermen. Because overcrowding would be eliminated there would be far less fish killed but not harvested due to gear loss. The advantage of fishing in very bad weather where the gear loss and fish loss are increased would also be diminished. All of these changes would result in healthier fish stocks which I feel is the most important goal of the Council and this would not be achieved through any other management scheme.

The additional advantages of an ITQ system are significant. It allows for a far more equitable initial allocation. With permits, either you've got one, or you don't. With an ITQ system, there could be as many different allocations as there are individuals. I believe that the fishery would be MORE accessible to newcomers than the Open Access fishery due to the fact that increments of quota could be traded. A newcomer could buy an appropriately small quantity of quota to begin in the fishery. In comparison to an Open Access system the ITQ results in a much higher optimum harvest, by reducing caught but not harvested fish in a variety of ways as mentioned previously. Since an ITQ system would allow fishermen to choose their weather, it would result in a much safer fishery. Since management would be by quota, and not by season, the seasons would naturally become more dispersed to suit each individual fishermen's needs. Processors would benefit by needing less cold storage, reducing labor costs, better utilizing their facilities and producing a higher quality product. No matter which management scheme you choose I will not personally be awarded any quota or permit. Nonetheless, I would STILL prefer an ITQ system over an Open Access system because I'd rather buy into a system that is well designed than be allowed free access to one that wastes the resource, requires overcapitalization, and cannot be adequately managed.

I recognize that there are many disadvantages to an ITQ system, and if implemented, there will undoubtedly be some that we have not anticipated. Here are some solutions to the commonly discussed difficulties. One concern individuals have is the ultimate concentration of the quota in the hands of a few. This could be avoided by limiting the amount of quota any one individual or corporation could own to a maximum of 1% of the total amount of quota for a given district. Another concern is that an ITQ system would require a far more complex tracking system. This is true, but the increase in usable harvest and decrease in operating costs to the fisherman will offset this. Since management costs would be high I would favor an annual user fee to assist funding the operation and I believe this is presently illegal. The law would have to be changed. Fishing illegally for the black market or catching fish in one district and declaring it in another could be partially countered by requiring hold inspections prior to departing the district in which the fish are caught. Reserving a percentage of the quota for annual auction or lottery could also ensure open access to individuals who weren't issued quota initially.

I would like to close by saying thank you for listening to my comments, I sincerely hope that you institute SOME form of limited access management program in the sablefish fishery, and I think the advantages of an ITQ system far outweigh its disadvantages. If we are willing to give the ITQ system a try and really work at it, it would give us the opportunity to maximize harvest and minimize costs to fishermen, processors, and thus ultimately the consumers. At the same time it would not lock out new entrants such as myself with a prohibitively high permit cost, and we could still recognize long time fishermen and guarantee them (as much as is ever possible) an opportunity to continue in the fishery.

Sincerely yours,

Bill Rotekū

P.S. WHATEVER YOU DO, I THINK IT IS IMPORTANT FOR INERTIA AND YOUR CREDIBILITY THAT THE COUNCIL DO AS IT PREVIOUSLY INDICATED AND INSTITUTE SOME FORM OF LIMITED ACCESS BEFORE 1989 SABLEFISH SEASON OPENS.

THANKS AGAIN

Bill

STATE OF ALASKA

STEVE COWPER, GOVERNOR

DEPARTMENT OF FISH AND GAME OFFICE OF THE COMMISSIONER

P.O. BOX 3-2000
JUNEAU, ALASKA 99802
PHONE: 907 / 465-4100

September 21, 1988

Mr. Clarence Pautzke
Executive Director
North Pacific Fishery
Management Council
P. O. Box 103136
Anchorage, AK 99510

Dear Mr. Pautzke:

I have reviewed the draft EA/RIR/IRFA, which addresses five alternatives for sablefish management in the GOA and BS/AI, and I appreciate the opportunity to comment on the document and the proposed alternatives.

In general, I favor a management system which will promote safe, efficient and optimum economic utilization of the sablefish resource, while assuring conservation of that resource. Within the confines of these general management criteria, I support a management system which allows dependent coastal communities and fishermen to derive the maximum socioeconomic benefits from the resource.

Allowing free access to the fishery, the "derby" type fishery, so prevalent with open access systems, tends to be inconsistent with the aforementioned general management criteria. The draft EA, in describing the current halibut fishery, provides an excellent example of a fishery with lots of things wrong. For this reason, I tend not to favor the strictly open access alternative.

Although the alternative for a multi-species longline fishery would reduce waste of sablefish and halibut resulting from discard mortality, this alternative is basically an open access system with the potential of having most of the associated problems. Again, I do not think this alternative alone would foster the most efficient and beneficial use of the sablefish resource.

The proposed license limitation alternative begins to address some of the concerns related to open access. In particular, the

reduction in the number of vessels, upon expiration of the two-year nontransferable licenses, would tend to reduce gear conflicts and attendant loss of gear and deadloss. However, the potential for eventual return to a derby type fishery would still exist under this system. Additionally, the expiration of the two-year, nontransferable licenses could abruptly result in a substantial number of fishermen in need of employment.

The IFQ alternative, or a combination system which includes IFQs, appears to have the greatest potential for avoiding some of the problems associated with a strictly open access fishery. Also, a system which incorporates IFQs could be developed which would continue to provide current fishermen the opportunity to participate in the sablefish longline fishery, while providing some safeguards to our coastal communities and rural residents not yet involved in the longline fishery.

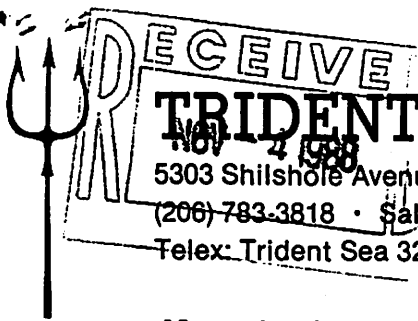
One aspect of the IFQ system that should perhaps be clarified in the EA relates to what entities would be eligible to purchase or lease IFQs after the initial allocation of the IFQs. Presumably, any entity could purchase or lease IFQs after the initial allocation, regardless of whether they had satisfied the sablefish landing requirements for the initial allocation.

Again, I appreciate the opportunity to comment and thank the council staff for their efforts in preparing the EA/RIR/IRFA.

Sincerely,



Don W. Collinsworth
Commissioner



TRIDENT SEAFOODS CORPORATION

5303 Shilshole Avenue N.W. • Seattle, Washington 98107
(206) 783-3818 • Sales: (206) 783-FISH
Telex: Trident Sea 321266 • Fax: (206) 782-7195

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November 2, 1988

Mr. John G. Peterson
Chairman
North Pacific Fishery Management Council
Post Office Box 103136
Anchorage, Alaska 99510

Dear John:

We are writing with respect to the North Pacific Fishery Management Council's (NPFMC) request for comments on the sablefish management amendment proposals. Domestic processors like Trident who have helped develop the sablefish fishery would be excluded from receiving the economic value of the resource under the limited access alternatives listed in the amendment package. Trident Seafoods Corporation, therefore, strongly supports the status quo—continued open access management for sablefish.

The most important ingredient for any management system, and especially a limited access regime, is that it treat all participants in the fishery equitably, based upon their historical participation. As with Pacific cod and pollock, domestic processors have taken the risk necessary to develop the sablefish fishery, often when there were no assured markets for U.S. processed product.

Any limited access system allocates the economic value from the fishery by determining who will have the right to utilize the resource. The seafood processing industry is generally skeptical of limited access systems because of our experience with license limitation systems. Under a license limitation system the number of fishermen permitted to operate is capped; however, the entry of new processing capacity remains open. As processing capacity grows, the price bid for fishery resources from a fixed supply of fishermen increases to the point where the processing industry collectively is receiving only the market rate of return on its investment. The "economic rent" for the fishery resource, therefore, is transferred exclusively to the harvesting sector.

Any vessel license limitation system will automatically transfer the value of the fishery to individuals who hold the license. The individual fishing quota (IFQ) alternative as described in the proposed amendment, suffers from the same disregard for the processing sector. Processors are not included in the initial allocation of IFQs and all rights to the economic value of the resource is instead transferred only to the harvesting sector.

The FOG Committee has spent a great deal of time deliberating the justification of limited access systems which include the domestic processing industry. Both New Zealand's Individual Transferable Quota system and eastern Canada's Enterprise Allocation system provide that processors receive a share of the quota for utilization of fishery resources along with harvesters. We are disappointed that the NPFMC has not listed a limited access system alternative for sablefish that includes the domestic processing sector. We believe that the NPFMC should, at a minimum, consider postponing imposition of a new

Brands:



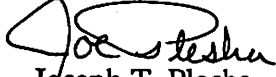
San Juan

Mr. John G. Peterson
October 28, 1988
Page 2

management regime for sablefish until it decides what action it will take with regard to the recommendations of the FOG Committee.

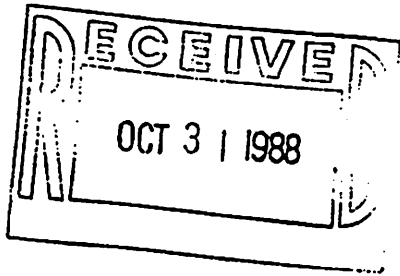
The amendment alternatives listed for sablefish would radically change the economics of our sablefish fishery. We strongly believe that any system which allocates the economic value of the fishery to interested parties must include all historical participants in the fishery equitably, including the processing sector. Trident Seafoods therefore urges the NPFMC to retain the status quo for management of our sablefish resources, at least until an alternative can be developed and reviewed which includes the processing sector of the seafood industry.

Sincerely,



Joseph T. Plesha
Trident Seafoods Corporation

cc: Mr. Barry D. Collier, President, PSPA
Ms. Nancy Munro, Chairman, FOG



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	Economist	
	Sec./Bkkr.	
	Sec./Typist	

Chairman
NPFMC
P.O. Box 103136
Anchorage, Ak. 99510

Sir,

As a long time local fisherman in Alaska and a Longliner per choice, I am concerned that I have being assigned erroneously under the title of fishermen opposed to any type of limited entry in ground fishing, specially Halibut.


There are a few fishermen's organization who opposed this type of fish management, unfortunately, they are the most vocal. In any circumstance, they don't represent the opinion of the majority.

As myself, there are many more fishermen who are in favor of a Limited Entry, but because of the emotional issue attached to this subject, plus our aptitude to think "it is coming", "it is the only right way", etc., we forget to express our opinion.

I will not go into the details of the benefits of Limited Entry. They were extensively listed in articles in fishing newspapers and magazines.

I just want to express my support to any type of Limited Entry presented by your organization. I only hope it is done soon. And for the guys in Kodiak, they will find out after a couple of years, that they haven't lost anything and gained a lot.

Waiting for your action


Ric Vrsalovic
P.O. Box 700
Whittier, Ak. 99693

RECEIVED

WESTERN ALASKA FISHERIES, INC.

NOV 29 1988

P.O. BOX 2367

KODIAK, ALASKA 99615

PHONE (907) 486-4112

TELEX 25-288

November 29, 1988

The Honorable Steve Cowper
Governor, State of Alaska
P.O. Box A
Juneau, AK 99811-0101

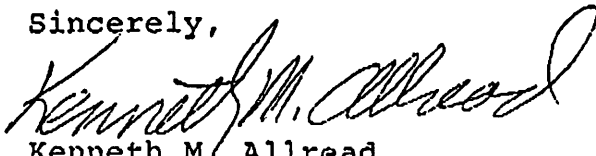
Dear Governor Cowper:

I am writing this letter because I am hearing alot of talk about Limited Entry in Black Cod and Halibut. I have also heard that Commissioner Don Collingsworth is likely to vote for this proposal. I wish to state my opposition to this proposal.

As General Manager of Western Alaska Fisheries, Inc. I have not gotten involved in these matters because they generally pertain only to fisherman. However in this case it does have a direct effect on us at Western Alaska Fisheries and all other processors in Kodiak. During the early 80's the King Crab resource failed and the Tanner Crab resource has nearly failed. At the same time the Halibut resource has strenghtened to historical levels and I believe Black Cod resources are strong. With these changes it was only natural for our vessels to start long lineing, and they have been very successful. I have polled my top 4 producers of their percentage of gross income from long lineing and they averaged 60% this year. Kodiak's economy is very strong right now, while much of Alaska's is weak. All of my crab and long line vessels are Kodiak residents. If these boats are eliminated from the long line fishery many of them would fail, and others would have to relocate. This would have a terrible effect on Kodiak's economy. All the plants would suffer a drastic reduction in product which would in turn mean the loss of many jobs.

In closing I urge you to not support any form of Limited Entry that would take these vessels out of the fishery. If you or Don Collingsworth have any questions feel free to call me. Also I will be attending the December council meetings.

Sincerely,



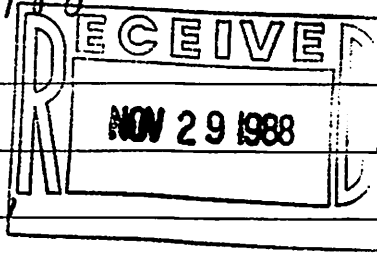
Kenneth M. Allread
General Manager

attachment

cc: D. Collingsworth
North Pacific Council Members
Dave Woodruff

Nov. 28, 1988

Kirk Wilson
F/O Helen - D
Box 1906



SITKA, AK. 99835

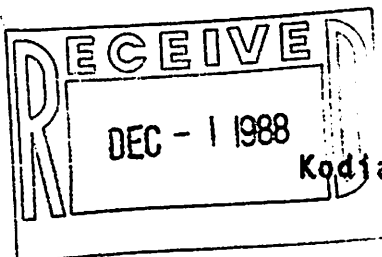
N.P.F.M.C.

Gentlemen,

The "derby" style of fishing which has developed in the longline fleet should be stopped as soon as possible x the loss of human life, boats, fishing gear, and the resource is avoidable and not necessary x

Please let us operate as professionals who have some respect for ourselves, the resource, our product and our customers x

Individual quotas ~~are~~ the only way to ~~and~~ ~~think~~. Kirk Wilson

AGENDA C-4
SUPPLEMENTALKodiak Fish and Game Advisory Committee
211 Mission Road
Kodiak, Alaska 99615

November 30, 1988

LATE COMMENTThe Honorable Steve Cowper
Governor
State of Alaska
P.O. Box A
Juneau, Alaska 99811-0101Subject: Opposition to the initiation of Limited Entry into the
sablefish fishery.

Dear Governor Cowper:

The economic health of Kodiak and other Western Alaska towns and villages is almost totally dependent on the fish resources in this area. For many years the North Pacific Fisheries Management Council had moved the Japanese sablefish fleet out of Southeast Alaskan waters. The result was a concentration of foreign fishing effort in the Central and Western Gulf of Alaska and the Bering Sea. The resulting gear conflict and direct competition with the foreign fleets precluded sablefishing by the local fleet in Central and Western Alaska prior to 1984. The precipitous rush into a sablefish limited entry program will have the effect of largely denying residents of Central and Western Alaska access to a significant portion of their natural resource base. The main beneficiaries of sablefish limited entry will be Seattle and Southeast Alaska fishing vessels.

By unanimous vote the Kodiak Fish and Game Advisory Committee resolves that the State of Alaska should not support the application of limited entry to the sablefishery by the North Pacific Fishery Management Council.

Sincerely,

A handwritten signature in cursive script that reads "Oliver N. Holm".

Oliver Holm, Acting Chairman
Kodiak Fish and Game Advisory Committee



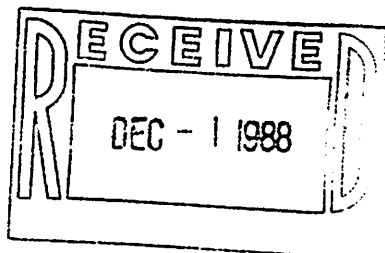
AGENDA C-4
SUPPLEMENTAL

SOUTHWEST REGIONAL FISH & GAME COUNCIL

c/o ADF&G, DIVISION OF BOARDS, P.O. BOX 3-2000, JUNEAU, ALASKA 99802 PHONE: (907) 465-4110

ADVISORY COMMITTEES

Chignik
False Pass
Iliamna
King Cove
Kodiak
Lower Bristol Bay
Naknek/Kvichak
Nelson Lagoon
Nushagak
Sand Point
Togiak
Unalaska/Dutch Harbor



LATE COMMENT

December 1, 1988

TO: Governor Steve Cowper
Don Collinsworth, Commissioner Fish & Game
Senator Ted Stevens
Senator Frank Murkowski
Representative Don Young

By phone conference the Southwest Regional Fish & Game Council reviewed the letter to Governor Cowper from the Kodiak Fish and Game Advisory Committee dated November 30, 1988.

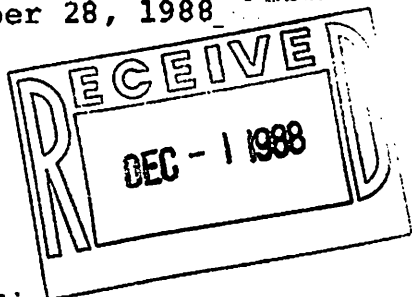
We are in full agreement with their concerns and resulting makeup of the fishing fleet if Sablefish Limited Entry were to be put into place at this time.

To ensure economic growth and stability in the communities of Southwest Alaska we urge the State of Alaska not to support the application of Limited Entry to the Sablefish by the North Pacific Fishery Management Council.

Alvin D. Osterback, Chairman
Southwest Regional Fish & Game Council

LATE COMMENT

November 28, 1988



Dear Sir:

My name is Jack Hill, I am married and have two Children. I have lived in Kodiak for the last 15 years and have been in the fishing industry for 23 years.

If Black Cod Limited Entry is put in and my vessel does not qualify it would cut my income 27%, my fishing days 16%. If Halibut Limited Entry is put in and my vessel doesn't qualify it would cut my income 36%. If I wouldn't qualify for halibut and black cod Limited Entry my gross income would suffer 64% out of a \$990,000.00 gross. I also employ eight men during black cod and seven men during halibut. We all live in Kodiak so it would hurt the town. I pay 42% of the gross to the crew, so you can see just how much people would suffer on the \$600,000.00 plus loss of income. As long as the fisheries are protected with quotas and season I see it as a right that anyone who wants to put up the time and money should be able to participate, when money is not there people will leave the fisheries.

I also have part interest in another vessel that would probably not qualify. The percentages are black cod 20%, halibut 40%. The lost income would be some what higher on that vessel.

Thank You,

Handwritten signature of Jack Hill.

Jack Hill
m/v Ruff & Reddy
PO Box 573
Kodiak, AK 99615

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.

Dear Councilmembers,

In this time of economic recession in Alaska, we urge you not to limit access to the Black Cod Fisheries. Each working Alaska fishing boat helps support deckhands, cannery personell, welders, woodworkers, machiners and many others. Small Alaskan coastal communities depend enormously on an active and healthy local fishing fleet.

Although these are federal waters, they are the only waters available to much of the Alaska fleet. We seek no privileges for local Alaskan boats but by the same token, we hope out of state interests do not dictate the use of these waters to our exclusion.

More so than many other states, Alaskan fishermen rely on more than one fishery to maintain their livelihood. It is not only the Kodiak fishermen that believe it is vital to their economic existence to have access to various fisheries.

The Black Cod Fishery is not an easy one and we think it will be self limiting to a large extent in most of these waters, particularly in the Gulf and Westward areas. Many fishermen who have ventured into this fishery have found that difficulties with weather, gear loss, crew longevity etc. to be overwhelming and have since left the fishery. Even with the incentive of record high prices in 1988, effort was down and the season lasted longer in the Central Gulf than in 1987. In 1988, longline fishermen could fish black cod from Jan. 1 into the Fall off the Alaska coast if so desired.

If bycatch problems can be dealt with, the fishery will remain healthy and problems of overcrowding will be largely self-limiting, particularly in the Gulf and Westward waters. Those willing to endure the hardships of this fishery should not be excluded.

WRITERS

CRAIG MATTHEWS F/V PEARL 235-8341

TOM HOGAN F/V KILKINNEY MISS. 235-8341

SIGNERS

PETE GEE 235-6347

BILLY CHORTE F/V HORIZON 235-7140

TOM TYMBAK FISH BUYER 235-8342

ERIC RINGER HOMER CITY COUNCILMAN 235-8133

JACQUA + RALPH BOKIN F/V BIG VALLEY 235-7433

Naparyarmiut

City of Hooper Bay
P.O. Box 37
Hooper Bay, Alaska 99604
(907) 758-4311

December 5, 1988

Comment on agenda item C-4

The City of Hooper Bay, a Bering Sea coastal community which currently does not participate in the ~~longtime~~ sablefish fishery endorses the Status Quo.

Our fear is that if a limited entry regime is instituted for Sablefish in the Bering Sea, it will open a Pandoras Box of proposals that would have the effect of accelerating the limited entry process for ALL fisheries under council jurisdiction.

We believe that the issue of resource access by Bering Sea coast residents deserves the careful consideration of the Council during these deliberations.

QUYANA!

for THE CITY OF HOOPER BAY, -

Mark Edward Springel

Mark Edward Springel

Assistant to the Mayor

FOG
COMM

(Typed from hand-written comments from Mark Lundsten)

May 27, 1988

Dear Nancy,

I have read your draft of the proposal to the Council from 4/29/88 and think you and Dorothy have pretty well summarized the problems and opinions up to the point of my last attended meeting. As a recommendation of my own for FOG, and as an appropriate recommendation that I hope FOG can make to the Council for its deliberations on the sablefish issues, I am proposing a "pro-choice" longline system, once again, and annotated this time.

First of all, I want to summarize the problems with the status quo and "permit-style" limited entry plans, especially as they have to do with overcrowded fisheries. The literature we have read documents well the resource waste, economic inefficiencies, and lack of control of fisheries managers when an open access fishery becomes too crowded. Exclusive areas, trip limits, gear restrictions, boat and crew restrictions, and other "legislated inefficiencies" have proven to be nothing more than stop-gap measures to slow down effort. License limitation, unless implemented when a fleet is very small, when it is not fully developed, seems only to encourage each individual to increase his effort more and more. Although numbers of participants may be frozen, the amount of effort per participant always seems to go up dramatically, making license limitation a useless exercise if the goal of fisheries management is to really decrease fishing pressure and avoid a "race for fish", "derby" openings, "Olympic-style" fisheries, or whatever term we may choose. All the accompanying problems of waste and inefficiency of the status quo not only seem to follow into license limitation schemes; but, usually, they seem to even get worse, re: Copes on B.C. salmon.

Further, a license limitation scheme poses the dreadful problem of who is "in" and who is "out". To make any current plan for halibut and/or blackcod "rational", clearly the vast majority would have to be "out". Political reality in this case, prevents management effectiveness.

So, with a few examples of actual, working systems in New Zealand and Eastern Canada of "shares", or ITQs or EAs or IFQs, I've been tempted (as many of us have) to embrace this type of system as a panacea. Unfortunately, a shares system is its own tar baby: the more you try to eliminate problems, the more you seem to become entangled in them. Plus, the great perceived advantage of shares, the solution of the bycatch problem ("let them buy it") is, I think, illusory.

Clearly, a "shares" system is, in economic terms, something like fire or nuclear energy. It is an incredibly efficient money-making system that, in application, is capable of causing great damage. I have no doubt that for the shareholders and for the nation as a whole, in the long run, a "shares" system provides the greatest net economic benefit. But, the problem of equitable distribution of net margins is the central one here. Whoever does get the shares will get the net margins. Whoever does not is virtually "out". As with a permit-style system, a "shares" system requires some blood to be drawn in order to work, to be worth doing.

Unfortunately, I think the status quo eventually will bleed us all dry and that some modified system of shares is the only real option we have that (1) will work, and (2) will certainly change the whole perspective we have on fishing but will inflict the least amount of pain.

Before I lay out my latest plan, I want to address a few more issues, pros and cons of shares and permits, that I've already spoken about with Dorothy on the phone. Clearly, shares can (1) eliminate most "waste" of fish, (2) really put a lid on effort, and (3) give every participant "something" besides providing for economic efficiencies already mentioned. "Highgrading" and "quota busting" are two obvious problems with "shares" but, I think, realistically, pose no greater threat or enforcement problem than the current poaching of halibut, for example, or the lack of "confirmable" data from catcher-processors. No system will ever be watertight, and over time, various mechanisms can be employed to alleviate the problem as much as possible.

The one "advantage" of the status or of a license limitation system is the preservation of competition as we have known it, both for markets and for resource, and concomitantly, the preservation of the balance, the "power balance", between processors, vessel owners, skippers, and crew. Under a pure "share" system the Horatio Algiers of 2010 would not be able to seek their fortune at sea with a small stake and some smarts and hard work unless they first bought shares with a bank loan. Also, their crew wouldn't fish for anything but a predetermined salary in most cases. The psychological shift among the harvesters would be enormous. Of course, the psychological trauma of the status quo, I think, may be worse, as we watch fisheries offer ever-diminishing returns and management become more and more helpless.

So, a solution that might work is to put a "shares" system (in the form of pro-choice) into place for the high-valued stocks of halibut and black cod, with their overcrowded fleets and the rat's nest of management problems they've bred, and to maintain an open access fishery for the lesser-valued, less intensely sought species (Pacific cod, turbot, rockfish). A maximum of 85% of the blackcod and halibut would be in the form of shares, with at least 15% perpetually open access in each area. Fishermen would have a choice of taking the best single year's catch (or 2 of 5, 1 of 4, or whatever) in terms of percentage of the TAC and averaging it with all other fishermen, or of relinquishing their share (a percentage) and fishing in the open access fishery (as per the "pro-choice" system developed earlier in FOG). As well, a limit, or ceiling would be put on the amount any given entity could own of each species. These would be granted to vessel owners and would be transferable. They would be used to catch fish with longlines only. The sale of these shares by the windfall recipients would be taxed close to 100%. Further sales would not be.

A fisherman in this situation would be encouraged to minimize his bycatch of his "share" species and maximize his catch of open access species. Processors would still have leverage in their traditional fashion to maintain their "net margins" on the underdeveloped species. With fishermen needing to still be competitive in the traditional sense, crew would still be paid on a share basis, on incentive. But the single-species "race for fish" would be broken down into a multi-species, year-round fishery.

Along this line of thinking, Pacific cod may eventually be a license limitation fishery in the longline sector, with an Amendment 14 style allocation among the gear groups. Those longliners with halibut and blackcod shares would fish it in one fashion, more than likely, and those longliners without, in another. No other stocks of fish should need any regulations except season and quota. The permits for Pacific cod would have to be issued before the fishery was developed and be based on vessel size classifications and, to speculate further, on a catcher-processor or catcher-only basis.

With the overcrowded groundfish species, it seems to me that a version of a share-style system is the only practical way to rationalize the fishery. Because of the problem of "net margins" and competition, and the "power balance", I also have tried to consider a bycatch system (a certain percentage of halibut and/or blackcod allowed to be taken with a certain amount of other groundfish) combined with a permit-style limited entry. Maybe someone else can come up with a solution; but, I can't see a way to avoid the current "race for fish" problems as they simply roll over into other stocks of fish. Part shares, part open access or license limitation, on the other hand, doesn't require the catch of Pacific cod or turbot or whatever, it simply allows it. By placing some key species under shares, the most intense effort is spread out naturally. The other species, still to be developed may not need a form of limited entry; and if they do, we may still have the time to restrict licenses to a reasonable level and avoid the problems of a "pure share" system.

I have thought, of course, how this affects other fleets and think that a parallel system can be applied to crab and the trawl fisheries. With crab, perhaps Ken's, plan for permits in king crab is all that is necessary. The other crab species may take care of themselves. Likewise, for trawlers (although the issue of factory trawler versus catcher-boat trawler is not really addressed by this proposal in itself), the key species seem to be Pacific cod and pollock in these fisheries. My point is the same--to apply "shares" (or with crab, permits) only as necessary to rationalize effort, and to maintain the status quo as fully as possible in every species we can. With longliners and trawlers, this encourages a reasonable, multi-species fishery, without taking the economic lever away from crew and processors.

As usual I submit this with the realization that you all might relegate it to the "interesting-but-will-never-work" file. But, I hope the thread of my thinking will at least contribute to the meeting. I'm sorry, once again, that I can't make this one; but, I have had to plan my season the best I can and this is what I have to do. It's a race, believe me.

s/Mark Lundsten

Note:

After a phone conversation with Mark this morning (5/27) we felt it was important to bring out three points.

- (1) In relation to the bycatch problem being illusory:

This is especially worrisesome if considering such bycatch as crab and halibut in the trawl fishery. Even if the trawlers could buy shares, and did, they wouldn't have enough since they catch more than the quota. Therefore, the quota still presents a problem. The political reality is that crabbers want to keep crab and the longliners want to keep blackcod and halibut. Any system must accommodate as much of the status quo as possible.

- (2) As to this proposal allowing the catch of Pacific cod, etc., as opposed to requiring it:

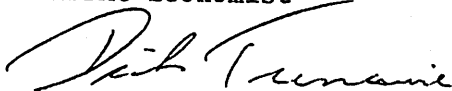
Under some of the multi-species longline proposals put forward, there is an incentive to waste Pacific cod or other species to get an opportunity to land high-valued halibut and blackcod. The point is that such a system transfers the "derby" to Pacific cod. The "race" would still continue and all for the wrong reasons.

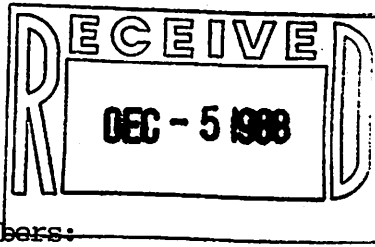
Which leads to

- (3) Fishing for the wrong reasons:

This is a sentiment that pervades much of what is going on. It goes from the Capital Construction Fund, to low interest construction loans, to implementing management measures which result in the wastage of one species to land another. Many people aren't thinking of other species or activities outside their own sphere. They are concentrating on one problem and not examining the consequences. Above all else, Mark says, "We should fish for the right reasons."

Dick Tremaine
NPFMC Economist





AGENDA C-4
SUPPLEMENTAL
December 3, 1988

Dear Mr. Pautzke / Council Members:

I am writing this letter to strongly urge you to pass a form of limited entry for the Sablefish Fishery.

I am owner / operator of a sixty-three foot longliner, which I have used almost exclusively for longlining blackcod and halibut for the past ten years.

In the past several years I have seen a dramatic fleet and gear increase, which has resulted in an extremely chaotic situation. That, if allowed will destroy this fishery. I believe that even at its current status there have been numerous problems developing, which are threatening the stocks, the grounds and the safety of the fleet.

With the relatively limited grounds available compared to the current fleet size and the realistic space needed by each vessel to fish effectively and with a minimum of conflicts with other vessel's gear. It has come to a point that gear conflicts with other vessels are almost a daily event. This results in lots of lost gear and consequently wasted fish, dangers to the crew hauling tangled gear and wasted time repairing damaged gear, and also waiting to haul gear that has someone else's gear over it.

The dramatic shortening seasons that have resulted from this huge increase in effort has forced everyone to push weather and fatigue restraints to the limit; in order to make it in time allowed. This has resulted in an increase in deaths and injuries.

I know these ever shortening seasons have made rational management of the resource next to impossible for you. Thereby being less and less able to manage towards achieving optimum yield of stocks and market demand.

Even though I will be unable to attend the meeting this week, I will be represented by members of my association (Fishing Vessels Owners Assoc). And I will fully support all positions taken by these representatives.

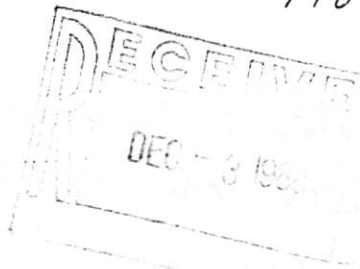
I sincerely hope the council will take bold actions to protect this resource at this meeting.

A large, cursive handwritten signature in black ink, appearing to read "Frank [unclear]".

F/V Pegasus.

AGENDA C-4
SUPPELENTAL

Greg BEAM
Flu Hayley Christine
Box 1994



SITKA

AK

99835

NPFMC

CLARENCE PRUTZKE

MR. PRUTZKE

My brief comments on Sablefish
limited entry to help decision makers
at the coming meetings

I favor limiting entry foremost
and would be happy with share
quotas. The findings of the meetings
in SITKA early this summer seemed
agreeable - start with everyone
who presently fishes - divide last seasons
~~how~~ catch into % of the quota - make
the SITKAS sable able with proper
limitations

I HAVE RESERVATIONS ABOUT LIMITED
ENTRY TOO BUT I FEEL THE ALTER-
NATIVES ARE WORSE - TOO MUCH
CARELESS EFFORT IN TOO SHORT OF A
TIME AND AN ORDERLESS "GYPSY"
FLEET MARAUDING AND INEFFICIENT

AS FAR AS BYCATCH GOES I
DONT LIKE TO SEE THE DRAG FLEET
WITH ~~ANY~~ ANY ESPECIALLY SEELINGS
HOW THE HALIBUT AND ROCKFISH
BOATS ARENT ALLOWED ANY

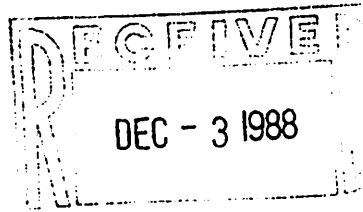
THANK YOU FOR YOUR CONSIDERATIONS

Sincerely

Greg Deam

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November 28, 1988

John Peterson, Chairman
North Pacific Fisheries Management Council
P. O. Box 103136
Anchorage, AK 99510

Dear Mr. Chairman:

I am submitting for the Council's review two articles which are germane to the deliberations on future sablefish management.

The first article, "Trends in Alaska Longline: Bigger, Better, Faster--More" by Jana M. Suchy, appeared in the December 1987 issue of Pacific Fishing. Too often we lose perspective on the day-to-day realities of some of these fisheries in meeting rooms. Ms. Suchy's article does an excellent job of describing and documenting the lamentable state of affairs in today's Alaska longline fisheries.

The second article is a well thought through discussion of ITQs by Dick Allen, a fisherman and member of the New England Fisheries Management Council.

I respectfully request the Council to vote for a management system which will provide the best long-term solutions for the resource, the fishery, the market and the nation.

Sincerely,

Jon Rowley

ITQs: The management wave of the future

Dick Allen is an inshore lobsterman, vice president of the Atlantic Offshore Fishermen's Association (AOFA), and a member of the New England Fishery Management Council.

While he has pondered the sticky questions of fisheries management for years, his views on Individual Transferable Quotas presented here, arose from a series of Saltonstall-Kennedy-funded conferences organized last year by AOFA called, "Matching Capital to Resources; limited entry and/or other alternatives." -Editor.

by Dick Allen

NARRAGANSETT, RI - If we're going to rebuild depleted fish stocks and maintain their productive capacity at "optimum yield," we have to create a management system that promises the individual fisherman a return on the conservation investment he is asked to make.

Under the present system, fishermen know that the rewards of their conservation sacrifice, possibly to the extent of going out of business, are likely to be taken advantage of by those fishermen who made no sacrifice.

The most equitable and sensible basis for a fisheries conservation incentive system is an individual transferable quota system, or ITQs. Like any fisheries management program, the introduction of ITQs into heavily exploited, complex, and, in most cases, depleted fisheries

would neither be simple nor readily accepted, particularly since the concept of an ITQ system is almost unknown among fishermen.

This article is an attempt to outline, for discussion purposes, a possible framework under which ITQs could be the basis for rebuilding

COMMENTARY

our fish stocks and revitalizing our fishing economy, and to explain how I've come to the conclusion that such a system is now needed.

Let's take the situation as it now stands. There is widespread agreement among fishermen that the fleet has the capacity to harvest far more fish than are available. To the extent that these boats can hang on, they are waiting to pounce on any stock that offers the promise of profit.

The fishing pressure ratchet that I have described on these pages in the past will keep fish stocks down to a low level. Unless we can keep fishing pressure down long enough to build up a good spawning biomass and a good age structure in the stock, any conservation gains will quickly be reversed; each biological and economic valley that our fisheries descend into will be deeper.

Keeping people - either newcomers or fishermen who want the flexibility to shift fisheries - out of a fishery,

however, goes against the grain for most Atlantic Coast fishermen.

Therefore, the key requirements of any fisheries management system must be that it: provides for new entrants; does not eliminate a fisherman's ability to shift fisheries; and does not stifle innovation.

Conservation incentive

This is how an ITQ system could work.

1. Existing fishermen would be allocated the right to catch an amount equal to the amount of each species they had harvested in the preceding year, or some formula based on recent years. This would be an individual's transferable quota.

This quota would be the private property of its owner, and could be sold, willed, leased, loaned, used as collateral, and generally treated as any other property would be.

An individual's quota would not vary in amount from year to year. For ease of quota trading, quota would be divided into small units such as 100-pound shares.

2. New fishermen, or fishermen wishing to enter a new fishery, would have to purchase quota from existing fishermen, or, in the event that the total quota was increased and more quota was therefore offered for sale, from the fisheries management agency.

3. A key attribute of the new system would be that, following a period of time in which more severe conservation restrictions were necessary, any subsequent increase in

quota would be made available first to existing quota holders as a return on their investment in conservation.

4. The system would give fishery managers an alternative to the current dilemma of taking steps to rebuild depleted stocks while trying not to put people out of business. It could achieve the necessary reductions in fishing mortality, not by tightening up on conservation measures, but in one of two ways:

- through natural (not forced by restrictive regulations) attrition in which fishermen would go out of business and sell their allocations. The buyers might not be able to catch the additional quota at the time of purchase, but they would be investing in the future; or
- through a quota buy-back program funded either by general government revenues or by a tax on the catch. Such a tax would represent an investment in conservation by remaining fishermen, and thus entitle them to additional quota as stocks improved.

Radical change needed

Depleted fish stocks, fisheries habitat destruction, ocean pollution, competition from imports and aquaculture, loss of waterfront facilities, threats of being legislated or regulated out of business by sport fishing pressure, and almost every other problem facing the commercial fishing industry has one basic cause - the common property, open access

nature of our fisheries. It has taken me about 20 years to reverse my long and dearly-held conviction that open access was the ideal method of allocating the wealth from the nation's fisheries. My radical change in viewpoint did not come about simply as a result of the passage of time. Neither was it something I caught from too-close contact with academics and fishery managers.

What changed my mind? Many things, of course, but two stand out. About three years ago I happened to notice the column in the National Marine Fisheries Service publication, *Fisheries of the United States*, that lists the year in which the record volume of fish was landed in each state.

I considered the tremendous and continuing increases in the size, power, and technology of the Point Judith, RI fleet, expecting that recent years would show catch record surpassing catch record.

Would you believe that the record landings in Rhode Island occurred in 1897? Today's major port of Point Judith wasn't even a gleam in the Army Corps of Engineers' eye. Fishing vessels were powered by hand or by sail. The otter trawl was unknown. Electronics wouldn't contribute to the fleet for another 50 years or more.

I was shocked. Could we have put all this effort into "fisheries development" and be producing less fish than we did a century ago? Was this progress?

Fishing pressure

Economists had been trying to tell me for years that the common property nature of fisheries made them fundamentally different from other economic activities, but I couldn't grasp exactly why this was so. Seeing how our fisheries production had actually declined with increasing effort, it finally dawned on me that a new fisherman cannot actually produce more fish. In a fishery producing its maximum yield, a new fisherman can only take fish away from existing fishermen.

We are mistaken, however, when we say that new fishermen just split the fisheries pie into smaller pieces. In fact, the ultimate result of continuing increases in fishing pressure is to make the pie itself smaller.

Greater fishing pressure not only reduces the size of the spawning stock, and thus the chance for successful reproduction, but perhaps more commonly, it reduces the likelihood that a fish will escape capture long enough to grow to its maximum potential size; it never has the opportunity to produce the greatest total weight possible.

Heavy fishing pressure also has the effect of reducing the number of year classes that make up the fishable stock. In that case, the fishery depends primarily on fish that just make the minimum size. This creates at least two further problems.

First, the fishery becomes susceptible to wide fluctuations in abundance because the fishable stock results entirely from the survival of larvae from one year, rather than a mix of many years, which provides a buffer.

If you are fishing solely on two-year-olds, and there was poor reproductive success two years ago, there won't be any fish for a year. If, with less fishing pressure, you were leaving a few three- and four-year-old fish in the bank every year, a year with no two-year-olds would still leave you fishing on three-, four-, and five-year-olds to make it through that year.

Secondly, with the fleet depending almost entirely on fish that are close to the minimum allowable size, fishermen cannot bear any increase in the minimum size; even when such an increase may be most desirable to rebuild the stock.

Can't we just improve the kinds of regulations we have now? Can't

adequate regulations avoid the deleterious effects of increasing fishing pressure?

I used to say that the fish don't care how many fishermen are trying to catch them. However, they do care because their chances of escaping capture to breed and grow is reduced with each new fisherman and new net that is put in the water. So traditional regulatory measures like size limits, seasons, mesh sizes, and closed areas have to be continually tightened if they are going to accomplish their intended purpose in the face of increasing fishing pressure.

An even more difficult problem

with relying on traditional regulations is their effect on fishermen. As a fishery becomes depleted, more restrictive measures threaten to "put people out of business," which is generally unacceptable. Not only do fishermen resist taking the losses that would be brought about by more restrictive regulations, under open access they know that any long-term gain from their sacrifice will not accrue to them, but will be available to anyone who wants to take advantage of it.

These arguments are not new, although I must admit to being somewhat blind to them for many years, as I steadfastly opposed "Limited Entry." I still oppose limited entry in the form of limited licenses, which are synonymous in the minds of most fishermen and fishery managers.

The second major event that opened my mind to the possibility that open access could be modified without bringing about the disadvantages of limited entry, was an explanation of New Zealand's system of Individual Transferable Quotas presented by Stan Crothers of the New Zealand Ministry of Agriculture and Fisheries.

Here at least, was a concept that

offered hope of overcoming the "tragedy of the commons," while maintaining the flexibility and reliance on free enterprise that many of us consider to be essential to the value of the fisheries.

With the above events providing the major turning points in my view of fisheries management, and with months of continuing mind and soul-searching, I have become convinced that limiting fishing pressure is essential to putting our fisheries on a sound footing, both biologically and economically.

Individuals who have experienced the brief period of relative prosperity enjoyed by many fishermen following the 200-mile limit may find it hard to believe that the fisheries may be returning to the low economic status that they held for many years. When I started in the fishing business 25 years ago, it wasn't unusual for lobstermen to drive oil trucks in the winter to make a year's pay. Without some positive action, I see those days returning.

I believe that most of the threats facing commercial fishermen are rooted in the common property nature of the fisheries. The rest of our economy, with which we compete in many ways, is based on private property rights, starting from the land that supports the waterfront facilities that we need to stay in business.

Certainly the institution of property rights in the fisheries, through an ITQ system, will bring about major changes. I am convinced that the balance between what we can maintain versus what we lose will be better under an ITQ system than it will be if we continue in our present direction.

Dick Allen

TRENDS IN ALASKA LONGLINE

Akin to Tom T. Hall's country tune extolling younger women, faster horses, and older whiskey, Alaska longliners could add their own verse about bigger boats, better methods, faster fishing—more fish and more mo-neeey.

Fishing bigger, better, faster is a direct result of one thing: shorter seasons. Halibut and sablefish fishing that used to stretch nearly year-round, providing both livelihood and lifestyle to longliners, has compressed in the extreme this year down to a 24-hour Chatham black cod opening and a 12-hour shot at halibut out west—at night. These abrupt, intense, and inhuman longline fisheries are decreed by Council and Commission, but fishermen too must take responsibility for the greed and waste that only help feed this vicious cycle.

Black cod pioneer and Pelican patriarch Jake Phillips laments the loss of the lifestyle, of the camaraderie among early longliners who'd never even think of cutting another's gear if set down without retying or buoying it off. Now, he says, he's told he's too nice a guy, that to make it anymore "you gotta be a mean sonuva-bitch."

"If that's what it takes to be a suc-



cessful fisherman nowadays, I don't want any part of it," and on that note Jake stepped out of an active role in fisheries politics some 18 months ago, choosing to fish the *Lea* in a scaled-back version reminiscent of the old lifestyle days. A once honorable profession for a hard-working lot of the hearty few has succumbed to the clamor of the money-hungry masses. These longline trends—they're not a pretty picture.

From Dory Days to Big Bucks

"When I first started out in 1935," recalls 70-year-old union crewman Jim Clarke, "I started on a sailing schooner. The *Belgrave*." She was a six-dory schooner, and Clarke tells of hauling the halibut gear by hand—virtually the same gear he still fishes aboard the Seattle-based *Vigorous*. The man has never missed a season, fishing these traditional Alaska waters, but other than gear similarities he says "everything is different."

"They're doing in one day what used to take 16, 17 days to do."

"White gold," says crewmate Neil Sandvik. "White gold up north." Like news of another Klondike, the high halibut prices of 1979, breaking the \$2 mark in 1980, lured many. "And *that's* when the boats started coming out of the woodwork," adds the *Vigorous'* skipper, Gary Bogen, fishing as his father and grand-

Story and photos by Jana M. Suchy

Bigger, Better, Faster—More

Losing a deckload, trying to save the boat.

point where it's easy to catch a fish." So easy, Cushing continues, "a lot of anglers making a living longline. "Just let us fish like we used to. Until the stocks are at a point where it's not so easy to catch a fish anymore, and you'll see a mass exodus out of the fishery—a lot of people that don't belong there.

"The fishery would manage itself... and it would be a sane fishery again," Otherviste, he says, "it'll never get better, it'll only get worse—the average fisherman's not going to get a smaller boat and scale down his operation." He's gonna maximize."

To The Max, To The West

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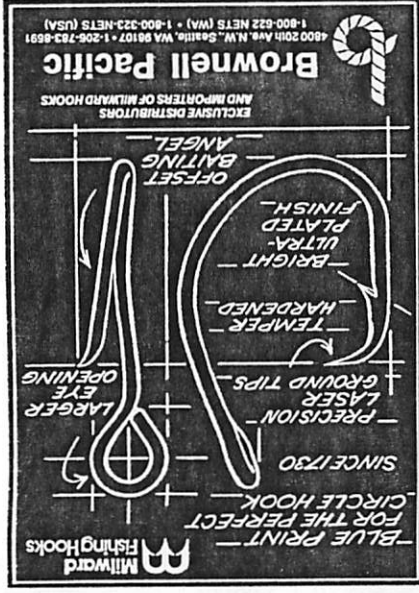
Boats get bigger to go farther west, following the fishing and crowding transient docks of westward ports. They're fortified for bigger weather and customized to streamline opera-

"The stocks have gone up to the point where it's easy to catch a fish." So easy, Cushing continues, "a lot of anglers making a living longline. "Just let us fish like we used to. Until the stocks are at a point where it's not so easy to catch a fish anymore, and you'll see a mass exodus out of the fishery—a lot of people that don't belong there.

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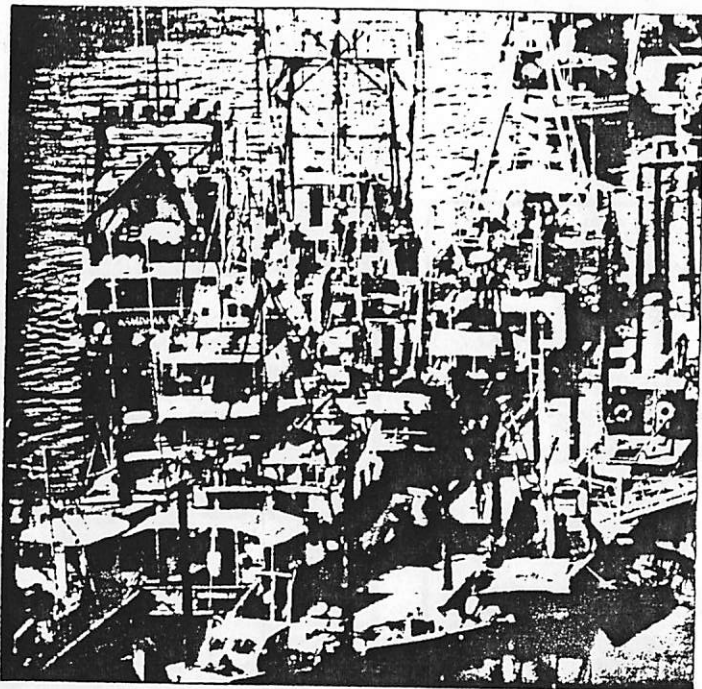
Lealida crew begins a set, charging at faster than running speed to accommodate the shorter seasons.

father have before him.

Seattle union counterpart Art Hodgins, skipper of the 70-foot sene-style *Alma*, talks of the traditional halibut industry out of Seattle—an industry of "iron men and wooden boats" celebrating its centennial next year. "A 24-hour fishery—that's pretty much of a joke." Speaking from Kodiak earlier this season, he resents that Seattle fishermen in these waters are now called the "foreigners."

"We're the bad guys... when the fish came back we should've grown with it, but we've been squeezed out."

Hodgins, 41, points to his crew as an example of the trend. "They're older gentlemen," union men feeling the need for security, tradition, equitably settled arrangements; one indelicate 22, two men in their 40s, two in their 50s, one in his 60s. Professionals. "Now go down and look at the halibut fleet," he urges. Kids. "They don't give a shit. They'll never die. Hey kid, you want a job? Hop on." But the shorter the opening, the fewer the crew; more infrequent the fishing, less



The Way West: Longliners jam Kodiak's transient dock earlier this season, many from Southeast where black cod closed quickly.

tion. Aluminum bulwarks, bait sheds, setting chutes, A-frame rigging. Cutaway ramps on big steel rigs, allowing roller men to just slide gaffed halibut up "the incline plane," as Unalaska "freelance" fish-cutter Dave Girard calls it, "And then we got gravity all over the boat" to aid further handling onboard. Shelter decks—almost completely enclosing the back deck to the weather. Bigger gurdies, better hooks, faster baiting—and more poundage.

"Circle hook changed everything," maintains Paul Clampitt, skipper of the Seattle schooner *Majestic*. "It immediately made seven-day halibuts in to three days. It turned black cod profitable. Made it easier to catch 'em. Lost a lotta fish trying to get 'em up from 300 fathoms. And that's what made everybody a longliner."

An automatic baiting system for circle hooks eventually followed, much to the chagrin of some who bought into the spendy but often chronically

temperamental technology. The idea was to eliminate the hindrance of longline's slow and labor-intensive baiting process, but persistent problems with baiting success—and alleged indiscriminate cutting of the groundline while setting—discouraged some fishermen after their major investment.

While Seldovia fisherman Gene Cameron reports success in his home port—claiming the auto-equipped *Deliverance* doubled halibut production fishing alongside his *Joann Marie*, where they used to keep up in poundage hand baiting—others remain unconvinced. "Problem is," says *Lindy* crewman Shawn Foust, "by the time you figure out how to fix it, you could've baited up a helluva lot of gear." Sitka schooner skipper David Kelly just says, "The *Arrow* and the baiter are an actual saga." Fishing out of Unalaska he readily admits the baiter baited ("It's a fair-weather machine") but it didn't cut down on

crew as thought. However, Kelly continues, "the baiter didn't get drunk and the baiter never had a hangover." Perhaps indicative of longliners' advancing sophistication, he adds that taping a video of the operation finally revealed the system's true performance and trouble spots.

But nothing quite matches the trends in gear, a classic case of bigger, better, faster—and more. Lots more. Some run much more than they can possibly haul in the allotted time, maybe 120 skates, simply cutting off after-hours at the sound of a chopper or abandoning it as expendable just to move to higher production strings strategically set in different areas. Gear has become the relatively cheap means to a lucrative end. As for hauling high-speed, "What do we care if we trash the gear?" asks Girard. After all, not working it over to dump in the next day. "We've got a month to work the gear. A (halibut) is worth \$80, a hook costs 35 cents." Figure it out. Gangions get shorter—hooks often a cross between halibut and cod-spacing gets tighter. More fish, faster, and more money.

Sitka's Buzz Schreiber of the *Evening Star* has referred to the tangled mass of dead gear lost on the narrow black cod grounds as a "spiderweb," but *Arrow*'s Kelly says "look at it like barbed wire.

"It's not the Japanese gear that you worry about on the bottom," he claims, "it's the American." Snagging till you part fosters bigger and stouter gear. "The edge is the edge, and where there's edge there's boats," says one, and where there's lots of boats there's bound to be gear conflicts.

If you didn't fish black cod before you had to fish shallow to deep, Kelly claims, you haven't fished black cod. Used to be able to go sideways on the edge and follow it, he says; nowadays people even want to split your berths—setting in between—no matter how tightly laid or swift the current. Obviously, gear conflicts abound, and with it the short-sighted, selfish solution to cut and slash the offender's gear only escalates flared tempers and wanton waste into a war zone.

One Sitka fisherman venturing west this year said of Kodiak: "These guys

don't know what gear pressure is," and estimates a four-fold increase in Southeastern effort over the last two years. "More boats, more gear on the boats." Inexperienced newcomers—crabbers, seiners, trollers—still flock to the monied longline fisheries left virtually unprotected by wide open access.

"What you're dealing with is human greed," says the *Rocky B's* Neil Huff out of Sitka. "Everybody's talking about having 200 skates next year."

Quality Came First

"I object to the quickness of the harvest," says Sitka Sound Seafoods President Harold Thompson. "There's too much fish being caught too fast. I don't think it hurts the resource, it's just a dumb way to run things." He tells of trends on the processing end: tremendous volumes of fish dumped on a plant at once, increasing handling while lowering quality; problems with sporadic rather than steady employment for the crew; expanded plant capacity sitting idle in-season between openings; dissatisfied crews and problems "maintaining a viable business under these conditions."

The derby-mentality monster that management has created pressures many fishermen to choose quantity over quality. Under the circumstances, it seems a legitimate trend, but in the end the market suffers, reputations tarnish, price drops, and fishermen lose.

"They're fresh fish," Thompson continues, but in some cases it's "a real travesty to quality considerations."

The most glaring example arises from the fleet's drift toward delivery of a round product—in some cases merely dry-iced and increasingly unbled. But Thompson also cites problems with slush and RSW systems either used improperly or incapable of pulling down temperature with the sudden large volumes. Granted, the lightened onboard workload is welcome relief in a round-the-clock fishery, yet even allowing for market absorption of an iced, round, unbled sablefish, hard-earned Alaska seafood

quality becomes a farce when the quickly delivered product sits slushed in some plants for days and days before finally dressed and processed.

In halibut, the alarming trend this year calls for dropping fish down in the hold uncut while racing to haul mass gear nonstop till the closing gun, then pulling the fish back up to clean on the run in, anchored up or even tied to the dock. The bellies get blood-shot and some pretty tired-looking 'buts surface hours or days later for gutting.

Pete Carlson, veteran crewman of the Port Alexander-based *Lualda*, tells of delivering a 65,000 pound trip after a 24-hour opening early this season. The experienced seven-man longline crew kept up with the fish—so it can be done—but due to an emergency at sea, six fish were inadvertently dropped down round and went undetected until unloading next day.

"Just the six undressed fish we had, they were terrible," Carlson recounts. "Cut 'em open, they were real rank. Just six. Can't imagine 20,000 pounds."

Poached Fish and Piracy

"It's not Sunday School out there," says one Sitka fisherman about another's notoriety for blasting flugs and buoys with a shotgun. "It's just a game. It's getting to be a cutthroat game now."

"Some of these guys with big trips are cheating," concedes Sitka Sound's Thompson. He calls it a vicious cycle itself, with more and more people justifying it because "everybody else is doing it." Many fishermen playing by the book to land comparably modest trips harbor anger and growing resentment, but take little action against their neighbors in the fishing community. Some charge irresponsible or "sloppy" management with creating criminals: financial pressures to produce in short periods and bad weather, often insufficient notice to close fisheries suddenly by field announcement.

One longliner says someone told him poaching is easier than robbing a bank—little advance planning, don't get thrown in jail 10 years, and make \$50,000. With enforcement monies

tight, piracy on the high seas may yet prevail.

Waste, Weather, & New Wave

Kelly calls today's fisherman "new wave;" if you've fished halibut before two-week openings then you're one of the older guard. He cites current catches of 1,000 pounds per skate of gear compared to the meager 50 pounds per skate of yesteryear. "That's the new wave mentality—a fish on every hook, I guess."

"When you take it to a one-day fishery," says *Rocky B's* Huff, "you take all the skill out of it. No more professionalism."

"I don't feel like a fisherman anymore," agrees Cushing of the *Neptune*. "I feel like a deckwork efficiency expert. Only thing that matters is how many hooks you run."

"The attitude alone has really changed," adds Pelican's Phillips. "No such thing as looking out for the other guy anymore . . . They can't be nice guys, I guess, and survive."

Sad longline trends. Others include a dramatic increase in wasted resource, greed, and danger. Single species management automatically wastes nontargeted fish, but incidental, legal bycatch often loses to no time and short space: Waters sometimes run red with dead roughey or idiots in floating trails behind black cod boats.

Fish till you sink or the season closes, whichever comes first. New-wave fishing from new fisheries management. "If you don't have too many fish, you don't have enough," says one new-waver.

But the inherent danger of forced fishing in extreme weather will yet come back to haunt us. Powerbroker managers have been known to respond, "You don't have to go fishing." Sure, tell that to the bank, the landlord, and the grocer. One Southeast crewman recounts the marine weather broadcast he heard in the middle of the Gulf on his way west, an ominous forecast calling for storm warnings and high seas gulfwide. "It's like they were saying, 'O.K. Everybody outta the pool.'"

The Buck Stops Here

"For once people are going to have to say the system is not working," Jake Phillips says with characteristic candor. The 1987 Alaska longline season makes his case. Sablefish regulatory areas closed with little warning, in-season maneuverings left fishermen too long in the dark about what would open when, where, for how long, and with what limits. Fishing is a business, fishermen are businessmen, and they need this vital information to plan their season, their expenses, their outfitting, their crew.

"If they're making the rules they have to be accountable for them," says an irate Southeast fisherman, pointing to the sablefish fish-ticket fiasco which kept everyone guessing till season's end if each area's quota had actually been filled. "You'd think," agrees Kathy Kinnear, vice-president of Kodiak Longliners Association, "they could have one person to keep track of the black cod fishery. It's worth 40 to 50 million dollars."

The very fact a teleconference was held September 1 to determine longline interest and need for a mop-up sablefish opening in certain under-quota areas speaks for itself in Alaska's longline dilemma. Of the 3B early September halibut mop-up, Mike Mayo of the *Oceanus* says, "I felt they were completely out to lunch with a 12-hour, nighttime opening," and Huff calls it "about the most stupid thing the halibut commission has ever done." It blew a stiff gale, with fishing both scratchy and dangerous, and yet another mop-up opening was called.

Programming for fleet inefficiency seems an unwarranted adversarial approach in an occupation already listed by the U.S. Government as the most dangerous in the nation. Sitka longliner Dennis Hicks figures somebody must've gotten together a few years back to invent the most unsafe fishery possible yielding the poorest quality product. Surely, gentlemen, the Alaska longline industry deserves better. **PF**