

I'm Mark Kandianis. I own and operate a 114 foot scalloper - named the Provider - here in Alaska. I've been fishing scallops in Alaska since 1979. As you probably know, the scallop fishery in Alaska occurs almost entirely outside 3 miles in Federally managed waters. However, though a draft scallop FMP was submitted to the Council in the late 70's, no action was every taken on it and so no FMP exists for the scallop fishery. As a result, under the terms of the Magnuson Act, the State of Alaska manages the fishery.

This, apparently, is the reason the scallop fishery has slipped through the cracks when control dates for moratorium for most of Alaska's fisheries were set by this Council.

The Alaska sea scallop fishery is a very small one. Currently, to my knowledge, less than 10 vessels are actively scalloping here. Historically, since the fishery began, the maximum number of vessels making any landing in any given year has not exceeded 19 - even in the virgin years of the fishery.

In the last two years, the level of effort has increased - due primarily to the increased catch rates of a couple of larger and more efficient vessels entering the fishery. This year, Southeast Alaska catches will equal or exceed catches for that area in the fishery's first year - and with half the number of vessels.

We became concerned about the potential for large numbers of new entrants to this fishery because virtually 100% of the other large vessel fisheries on both the East Coast and the West Coast will soon be subject to moratorium control dates or ITQ's.

The North Atlantic groundfish fishery, the Pacific groundfish fishery, the North Pacific groundfish and crab fisheries, and the North Atlantic and Mid-Atlantic scallop fisheries have all established projected or finalized control dates for moratorium on entry or ITQ's.

The New England council presently estimates 50-75 scallop vessels will lose the right to fish once the current control date is finalized for the Atlantic sea scallop fishery. Many of these are new entrants which were new construction dedicated to scalloping. Many of these will also have no catch record for the Atlantic groundfish fishery and will be unable to enter that fishery or, will choose not to due to the severely curtailed fishing effort projected for the next several years.

The Alaska sea scallop fishery will be open to entry and it is only logical to assume at least a percentage of this fleet will go to the only open fishery remaining to them.

When these additional boats enter the fishery, it will be only a matter of months before all of us are unable to make a living. And we will be unable to switch to groundfish or crab because most of us have made no groundfish or crab landings.

We would like for the Council to include scallops under the groundfish and crab moratorium if that is possible. We have not been able to find out if that is within the Council's authority since no FMP exists. However, since it appears to be a gray area, we urge the Council to make the attempt to include us under the moratorium control date along with the other miscellaneous

species such as octopus, squid and snails.

However, if the Council determines that you cannot do this, we urge that you recommend to ADF&G that a moratorium on scallops is necessary so that we may pursue that avenue through Alaska State regulations. We believe that this is critical to sustaining the scallop fishery in the North Pacific over the long term.

Since this resource occurs almost entirely in Federal waters, the Council has a responsibility to insure it is managed properly, to sustain an economically stable and viable fishery. We feel the Council should, at the least, become actively involved in advising ADF&G regarding proper management of this fishery.

YAKUTAT SCALLOP HARVEST 1968 TO 1992

