

**Buck and Ann Fisheries, LLC**

**679 E. Harbor Dr., Warrenton, OR 97146**

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November 24, 2014

Mr. Dan Hull, Chairman  
North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

Re: GOA Sablefish Longline Pots

Dear Mr. Chairman:

Please let this letter serve as support for GOA sablefish longline pots. With the growing problem of whale predation on traditional longline gear, particularly in the sablefish and halibut fisheries, longline pot fishing offers specific opportunities to reduce wastage in both of these fisheries. Change in any traditional fishery is met with skepticism, and I understand there are those with concerns over how certain changes may affect their fisheries.

On the Pacific West Coast, trawl, longline pot, and hook-and-line longline gear all exist together in the same areas and many times all prosecuting the same target species. The fishermen have learned to work together and gear conflicts have proven to be manageable and not a significant problem. I do not believe gear conflicts will be an issue in Alaska. Small boats and large boats all coexist and operate well together. Grounds are not preempted by one gear type at the expense of another.

My company and two of its vessels are just completing our fourth year as primarily longline pot fishing vessels in the West Coast Groundfish Trawl Catch Share Program. My personal experience is that pot fishing is one of the cleanest fisheries with one of the lowest levels of incidental catch on non-targeted species. In the four years of fishing, we have caught 1,886,595 pounds of fish. Out of this total catch number, all but 2,766 pounds (0.15 percent) were targeted species. Only 320 pounds of halibut (0.02 percent) were caught, and most of these fish were in good condition when returned to the sea. This data is confirmed by 100 percent NMFS observer coverage.

With experience in gear modifications, both size grading and exclusion or elimination of non-target species can be done on the seabed with minimal or no adverse effects to the resource. Small fish can escape pots by fishermen simply inserting escape rings and modifying mesh size. Halibut exclusion and escape bars are also effective and a challenged resource does not have to be brought to the surface, handled, and then returned to the sea to try and make its way back to the bottom. In addition, whale predation on fish traveling from the seabed to the surface does not occur.

While some vessels will not be suited well to longline pot fishing, most vessels in a wide range of sizes will be able to participate effectively with longline pots. It will be important to the viability of longline pot fishing for all vessels, but even more important to small vessels, not to be required to remove their pots from the fishing grounds when delivering product to shore-based processors or running from weather. While I understand there are some fishermen who are worried about grounds being

preempted by longline pots, I wish to point out this has not been a problem on the Pacific West Coast. Setting a reasonable limit on pots of 300 to 400 pots for small and large vessels will effectively deal with this potential problem. If vessels are required to remove their pots from the grounds while vessels deliver product, it will significantly reduce the economic viability of this fishery and effectively eliminate the smaller vessels' ability to effectively participate.

In closing, I would request the NPMFC to permit longline pot fishing in the GOA and to minimize overregulation and gear restrictions whenever possible. Longline pot fishing will eliminate whale predation and drastically reduce incidental catch of non-target species. The sablefish and the halibut resource will both benefit by allowing longline pot fishing.

Thank you for your consideration.

Sincerely,



Bernie Burkholder  
Buck and Ann Fisheries, LLC