MEMORANDUM

TO: Council, SSC and AP Members

FROM: Jim H. Branson
Executive Director

DATE: November 28, 1984

SUBJECT: Gulf of Alaska Groundfish Fishery Management Plan

ACTION REQUIRED

No action required. For information only.

BACKGROUND

Status Report on Cul-de-sac Management

In September 1984 I reported on the status of the Southeast Alaska cul-de-sac problem. The FCZ intrusions into the Southeast archipelago would have opened by federal regulation to sablefish fishing along with all other waters of the FCZ off Alaska. Historically those areas have not opened until the state season on March 15 (southern areas) and September 1 (northern areas). The resource in these areas is included in the state's guideline harvest levels and not in the FCZ OY.

Last February the Council voted to close the four culs-de-sac by emergency rule until the traditional opening dates, solving the problem for 1984. The Gulf of Alaska Plan Team was directed to follow up the emergency rule with a plan amendment. In the meantime, Congress amended the Act to put the culs-de-sac under state management for fisheries. This legislation was signed by the President on November 9, 1984, eliminating the cul-de-sac problem with groundfish management. These waters will now be managed by the State of Alaska. Even though the law has been revised we need to make similar revisions to the Gulf of Alaska FMP. The Plan Team is preparing draft language for the upcoming amendment cycle to do so.

Deadline for Proposed Changes to FMP and Regulations

This meeting is the deadline for proposals to amend the Gulf of Alaska Fishery Management Plan. In April 1984 the Council adopted a cycle for amending the Gulf of Alaska FMP that provides specific deadlines for proposals, preparation of amendments, and final decision-making by the Council. The cycle began in September with a preliminary review of the status of stocks and the needs of U.S. industry for 1985, and a call for proposals. Following this meeting, the proposals will be compiled and prioritized by the Gulf of Alaska Plan Team. Copies of the proposals and the team's recommendations will be presented to the Council at the February meeting. The deadlines are:

Date	Action
February 6-8	Council reviews proposal package; proposals identified for amendment package.
March 27-29	Council reviews draft decision documents; sends package out for public review.
May 22-24	Council reviews public comment; final decision on amendment package.
June	Submit amendment to Secretary of Commerce.
November	Amendment implemented.

D-2 Supplemental

ARNOLD H. JARDSTROM
F/V OCEAN CHALLENGER
Fort Bragg, California

December 3, 1984

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

Attn: James Campbell, Chairman
Jim Branson, Executive Director

Gentlemen:

I would like to express my feelings to the North Pacific Fisheries Management Council.

I, Arnold H. Jardstrom, F/V Ocean Challenger, have been a fisherman for the past 31 years, and the last 15 years I have fished mainly blackcod off the California, Oregon and Washington coast, except the last five years I have fished the Alaska coast.

The main reason I moved to Alaska to fish blackcod is that in the past 7 or 8 years the blackcod pot fishermen have put the longline fishermen out of business for the following reasons:

1. Thousands and thousands of traps lost each year.

2. All traps are supposed to have a cotton rot-out panel, but in my experience I have seen fishermen repair old mesh on traps and it is almost always covered with nylon or wire mesh. When these traps are lost they trap fish for a long time - up to a couple of years or until the iron frame rots and collapses.

3. Another bad thing I have seen happen is when pot fishermen leave their gear unattended for long periods of time when the weather is bad, or worse, leave their gear unattended while they participate in other fisheries.

4. While these traps are out for long periods of time, buoys chafe off and longline fishermen can't fish these grounds because of entanglement which results in more gear loss. As a result longline, drag fishermen, etc. either cut off buoys, shoot buoys or drag their nets through and cut gear off which really becomes nothing but a large garbage dump after a year or so.

In my home town of Fort Bragg, California, I have seen approximately 10 of my friends go broke in the pot fisheries.

At the present time there is not one boat in Fort Bragg left in the business. That should tell the Council something. The Oregon and Washington coast have very little effort in the pot fisheries anymore because of lost gear.

A lot of fish companies are not happy with the quality of fish from pots. If they are not taken out of pots regularly, the fish tend to bruise somewhat and discolor the meat.

I personally would like to see everyone fish longline for blackcod for the following reasons:

1. When gear is pulled another boat can fish that area while you go to deliver your catch; in other words, the grounds are not tied up for long periods of time.

2. You cannot have a better quality fish than hookline.

3. No gear conflict between longline fishermen, as opposed to the conflict between pot and longline fishermen.

For all of the above reasons I have mentioned I would like the blackcod pot fisheries stopped before it gets out of hand as California, Oregon and Washington have. Thank you.

Respectfully yours,

Arnold H. Jardstrom

Arnold H. Jardstorm
F/V Ocean Challenger
Fort Bragg, California

AHJ:3929

P.S. Enclosed is an additional copy of this letter to be given to Mike Mayo.

Scientific and Statistical Committee,
Dear Sirs,

The following is my experience with gear conflicts between long line pot black cod gear and traditional long line hook and line gear.

First, as a crewman aboard a local S.E. Alaska longline boat, I've had the unpleasant experience of having a good black cod trip disrupted half-way through by meeting up with a pot boat fishing our traditional ground. Had this been a long line hook and line boat, it would have been nothing more than some good competition. But the nature of black cod fishing, depths, currents etc..., combined with clumsy pot gear that is easily lost, makes the presence of pot gear extremely detrimental to hook and line gear.

Upon encountering the pot boat on one particular trip on the "Aloha" in April '79 we were forced to turn around and fish ground that we'd already fished, since, due to his somewhat erratic style of fishing and the tremendous amount of gear he had placed in the water, we didn't know where his set gear was or where he had lost gear at. His gear was strung for nearly the entire length of Kruzof Island. To fish where we knew he had been, would have been too much of a risk to our gear. The fishable depth for black cod in S.E. Alaska is a very narrow strip along the continental shelf. When the existing hook & line fleet is fishing black cod, it is quite crowded as it is.

In 1980 I began fishing my own boat and before long I found exactly where some lost pot gear was at. After 3 days of good fishing in April '82 and a good trip expected, we set all of our gear in two sets off of Kruzof Island.

This set was a very productive area in the past. Soon after beginning hauling, our gear became very tight and eventually the yellow 1" poly rope started coming up. Since our gear is only 1/4" nylon, I was very concerned. We broke that end off after trying everything to get it loose and away from the pot gear. Same thing on the other end. And the next string. Evidence of lost pot gear was on the very little bit of gear we got back from each set. 1/4" rope is no contest to 1". Not counting the fish lost on the gear, and lost fishing time, and crew's time making up new gear etc our monetary loss was $1600.00+ Obviously there are hidden costs involved. The once productive spot where his lost gear is, still cannot be fished by hook & line gear and probably will not be able to be in my lifetime. I'm 28. His pot gear no only is in the way, it's still fishing. So-called bio-degradable panels or not...

The Southeast Alaska black cod fishery is shorter, more crowded every year. There simply is no room for pot fishing, dragging or means other than long line hook and line

We have an existing, traditional hook and line fishery that is increasingly more regulated. The current fishery is producing the finest quality fish. Hook and line and pot gear don't co-habitate. Very simply, if pot fishing is permitted in the Gulf of Alaska, those responsible for allowing it will be responsible for the demise of the existing long line fishery as we have always known it.

Sincerely,

Greg Cushing

747-3035

Greg Cushing
Box 164
Sitka AK 99835

Dec. 2, 1984

To the North Pacific Management Council:

We on the Rose-Lynn fish out of Sitka and have been doing so since 1975. The area in which we longline blackcod has several strings of blackcod pots which were lost a few years ago from the F/V Billy-Don. We've had the unfortunate experience of tangling up with this derelict gear several times, once losing 14 skates of gear, an anchor, and shot line and several times just stripping hooks off the gear.

I know of several other gear conflicts this summer between longliners and pot boats, mostly around the Cape Addington-Forester Island area.

I had the oportunity to speak to three crewmen who had just quit aboard the pot boat the F/V Salty II this summer. According to them everytime they became entangled in blackcod longline gear, the skippers, (two Canadians) would order the crewman to cut the longline gear. This was done no matter whose fault it was that the gear was tangled and it was done without retieing the lines. This meant gear loss and extra time finding the second ends to the longliner involved.

The longline fleet has shown it can and will harvest the blackcod quota in the Gulf of Alaska. It was the persistance of the longline fleet that pushed the Japanese blackcodder farther west, not the pot boats or the draggers. One last thing about the pot boats is that they process every blackcod that comes over the side by freezing them onboard. We longliners have a minimum size of 3 pounds dressed weight which makes the fishery more selective and better for all.

Sincerely

Brian L Blankenship

Dec. 7, 1984

To the North Pacific Management Council:

We on the Kore-Lynn fish out of Sitka and have been doing so since 1975. The area in which we longline blackcod has several stings of blackcod pots which were lost a few years ago from the F/V Sally-Don. We've had the unfortunate experience of tangling up with this derelict gear several times, once losing 14 skates of gear, an anchor, and shot line and several times just stripping hooks off the gear.

I know of several other gear conflicts this summer between longliners and pot boats, mostly around the Cape Addington-Forester Island area.

I had the opportunity to speak to three crewmen who had just visit aboard the pot boat the F/V Sally II this summer. According to them everytime they became entangled in blackcod longline gear, the skipper, (two Canadians) would order the crewmen to cut the longline gear. This was done no matter whose fault it was that the gear was tangled and it was done without restoring the lines. This means gear loss and extra time finding the second end to the longliner involved.

The longline fleet has shown it can and will harvest the blackcod quota in the Gulf of Alaska. It was the persistence of the longline fleet that pushed the Japanese blackcoddee fishing vessel, not the pot boats or the draggers. The last thing south the pot boats in that they crosses every blackcod line coming over the side by dropping them onboard. So longliners have a minimum size of 3 pounds dressed weight which makes the fishery more productive and better for all.

2213 Sawmill Creek Rd.,
Star Route
Sitka, Alaska 99835
December 3, 1984

North Pacific Fisheries Management Council
Box 3136
Anchorage, Alaska 99510

Dear Sirs:

This letter is in reference to gear confilcts between longline and pot gear. On July 16, 1981, fishing on the Loran coordinates 14475 and 28301, which is approximately 21 miles west of Kruzof Island, with crew members John Hitt and Kyle DeBord, I obviously set parallel to abandoned pot gear. The first string was partially tangled and there was extensive damage to the last half of the string. The second string was tangled all the way and was extremely slow and dangerous to pull. When I speak of dangerous, why don't wou ask one of the people delivering this letter what I mean by that. If it had not been almost new gear, I doubt that we would have gotten any of it back. As it was, we lost approximately 2000 hooks and/or ganions. Also, I had to cut the trip three days short during good weather, and we spent three days work in town untangling the mess and replacing hooks and ganions. Probably the only good thing that happened was that we recovered approximately100 fathoms of 1 1/8-inch polypropelene pot longline. I have taken the dates and figures from my logbook, and I could supply copies on request.

This area has been one of my big producers down through the years and now will be impossible to fish with longline gear for many hundreds of years. If pot boats are allowed back in Southeast, the repetitions of this scenario will be the demise of longlining.

Sincerely,

Dexter B. Kyle

Dexter B. Kyle

2216 Sawmill Creek Rd.,
Star Route
Sitka, Alaska 99835
December 8, 1984

North Pacific Fisheries Management Council
Box 3136
Anchorage, Alaska 99510

Dear Sirs:

This letter is in reference to pear conflicts between longline and pot gear. On July 14, 1983, fishing on the Lower coordinates 11472 and 28001, which is approximately 20 miles west of Kanoff Island, with crew members John Hitt and Kyle Jackard, I obviously set partially to abandoned pot gear. The first string was partially tangled and there was extensive damage to the last half of the string. The second string was tangled all the way and was extremely slow and dangerous to pull. When I speak of dangerous, why don't you ask one of the people delivering this letter what I mean by that. If it had not been almost new gear, I doubt that we would have gotten any of it back. As it was, we lost approximately 1000 hooks and/or gangions. Also, I had to cut the wing three days short during poor weather, and we spent three days work in town untangling the mess and replacing hooks and gangions. Probably the only good thing that happened was that we recovered approximately100 fathoms of 1 1/8-inch polypropylene pot longline. I have taken the dates and figures from my logbook, and I could supply copies on request.

This area has been one of my big producers down through the years and now will be impossible to fish with longline gear for many hundreds of years. If pot boats are allowed back in Southeast, the repetitions of this scenario will be the demise of longlining.

Sincerely,

Dexter R. Kyle

December 2, 1984
Box 1578
Kodiak, Ak. 99615

Jim Campbell, Chairman
North Pacific Fishery Management Council
P.O. Box 103136
Anchorage, Ak. 99510

Dear Mr. Campbell:

I regret that business has prevented me from attending this December meeting of the North Pacific Fishery Management Council and I appreciate the opportunity to have my remarks read into the record.

Black cod has traditionally been a multi-gear species. There is no method of trawl fishing that is so species specific as to exclude a bycatch of black cod. Indeed, as trawling extends into deeper water for other high value species, such as Dover sole and hard heads, for both shorebased plants and joint venture processors, the necessity for a trawl bycatch will become more important.

It is unreasonable to believe a fishery which supports a very small fleet and harvests around 7,000 metric tons should be allowed to impact a fishery which has a potential of producing 1.2 million metric tons, worth, at today's prices, a minimum of $144 million.

It is impossible not to catch black cod in a trawl. It is criminal to discard the product or try to hide the fact that the bycatch problem exists. It would be equally criminal to halt the Americanization of the groundfish fishery over allocation of black cod to one gear type.

At present prices for groundfish, black cod represents a significant portion of the income of American trawlers -- helping to offset the low prices now paid for other species -- and will become more significant in our efforts to compete on world markets.

I would ask the council to very carefully consider the impact of any decision that they make regarding any type of limited entry or limited gear in any and all fisheries.

In regards to other proposals before the council at this meeting, I wish to support the Alaska Draggers Association and North Pacific Fishing Vessel Owners Association in their positions.

Sincerely,

Dave Harville
Managing Owner for Linda Jeanne, Margaret Lyn,
Hickory Wind and Little Bear

T. Joyner
Box 479
Sitka, AK 99835

30 November, 1984

Scientific and Statistical Committee
North Pacific Fisheries Management Council

Dear Sirs:

In 1981 and 1982 I lived in Japan on the island of Hokkaido. While there, I wrote a number of articles for Fishing News International of London on various aspects of the inshore, coastal fisheries of Hokkaido. In doing this, I benefitted from the guidance of the Curator of Fisheries of the Provincial Historical Museum. This gentleman was the son of an artesanal fisherman and was well acquainted among the inshore fishermen of Hokkaido. He introduced me to many individual fishermen and to the interlocking heirarchy of fishery cooperatives through which a good mix of small, healthy inshore fisheries are conducted and managed. Under this system, a benign national government seems content, within the broad guidelines that it provides, to devolve upon local fishing cooperatives much of the responsibility for making decisions relevant to the specific fisheries with which they are directly concerned.

With this system, the surprisingly substantial economic benefits of small, localized, inshore fisheries are distributed widely among a sizeable population of artesanal fishermen in many fishing communities along the coasts of Hokkaido and some of the adjacent small islands in the Sea of Japan.

In surveying a number of these artesanal fisheries for material for my articles in Fishing News International, I was struck by the widespread use of long-line techniques for a great variety of fishing targets, each in its appropriate season. In the hands of fishermen skilled in these techniques, bottom, midwater and near-surface species can be selectively fished with a very small investment of capital in boats and gear, and with minimal impact on the environment. I met artesanal fishermen in Hokkaido who were able to clear $30,000 annually with no more equipment than a 7-meter canoe powered by oars or an outboard motor no larger than about 7 H.P., a few skates of long-line gear, a water glass and a couple of fish spears.

From my experience in Hokkaido, I have become convinced that a management system that promotes fisheries that are highly selective, flexible, which produce minimal environmental impact, require little capital investment and which readily can be managed at local levels, is most likely to be able to provide long-term economic benefits for coastal fishing communities such as those of Southeastern Alaska. Further, it would seem to me to be reasonable to hope that the Council will consider most carefully the arguments presented at this hearing by the representatives of the Alaska Longliners. In my judgement, a long-line fishery for black cod and for rockfish should prove to be efficient, environmentally benign and optimally productive of economic benefits for the fishing communities of Southeastern Alaska.

Sincerely,

Timothy Joyner

Timothy Joyner, Ph.D.*
Sheldon Jackson College

* Former Director, Aquatic Resources Improvement and Environment Service
Food and Agriculture Organization of the United Nations, Rome, Italy. (Ret.)

1984
Sitka Sablefish (Black Cod)
Economic Study

Landings [1]	Average Price	Gross Sales	3% Fish Tax
4,000,000 lb.	#.70/lb.	$2,8000,000	$84,000

Potential Wages Available from Sablefish Deliveries

Sales	Crew Share [3]	Wages	
2,800,000	55%	$1,540,000	Crew Wages
		560,000	Processing Wages
		2,100,000	Total Wages Available Equals 2½% of Sitkas Total Wages [2]

Sablefish Fishing Expenses and Local Tax Received to Sitka

Expense	$Dollar Value per Trip [3]	Trips	Total	Sales Tax	Tax
Fuel	600	221	$132,600	4%	$ 5,304
Food	700	221	154,700	4%	6,188
Bait & Ice	1000	221	221,000	4%	8,840
Gear	300	221	66,300	4%	2,652
Misc.	500	221	110,500	4%	4,420
			$685,100		$27,404
			Fish Tax to Sitka		$28,000
			Total Taxes to Sitka from Sablefish Fishing		$55,400

Sablefish Sales	$2,800,000
Total Fish Sales	$23,000,000

Sablefish equals 12% of total fish sales to Sitka.

Sitka is in the top 20 fishing ports in the United States.

Sablefish Landings Some Other Alaska Ports.

Kodiak	3,394,160 lb.
Seward	2,500,000 lb.

[1] From Alaska, Dept. of Fish and Game
[2] From Sitka Economic Base Study 1984. Total Sitka Wages is $83.7 million
[3] The average wage per settlement from 6 Sitka fishing vessesls

6 Dec. 1984, Michael J. Mayo

1984
Economic Value of Sablefish (Blackcod) to
Alaska, Local Communities and Fisherman

DISTRICT	ROUND WT. MT	ROUND WT. LBS	DRESSED WT. LBS	VALUE ($.70/lb)	FISH TAX 3%
Eastern Gulf:					
Southeast and East Yakatat	2,900	6,391,600	4,474,120	$3,131,884	$ 93,957
Chatham Strait	859	1,893,236	1,325,265	927,686	27,831
Clarence Strait & Dixon Entrance	147	323,988	226,792	158,854	4,763
West Yakatat	1,507	3,321,428	2,324,999	1,627,500	48,825
	5,413	11,930,252	8,351,176	$5,845,924	$175,376
Central Gulf:	3,101	6,834,604	4,784,223	3,348,956	100,469
	8,514	18,764,856	13,135,399	$9,194,880	$275,845
Less: Fish Delivered Outside Alaska					
Central Gulf	11				
Eastern Gulf	92				
	(103)	(227,012)	(158,908)	(111,236)	(3,337)
TOTAL RESOURCE AND VALUE TO STATE OF ALASKA	8,411	18,537,844	12,976,491	$9,083,644	$272,508

From Alaska Department of Fish and Game

6 Dec. 1984, Michael J Mayo

James Cooper F/V Miss Aurora
Chatham Straits
1975

It is my opinion that in no way is blackcod long line gear and blackcod pot gear compatible.

In any gear entanglement, the long line gear will probably always suffer the greatest loss.

Longline gear, for anyone that might be unfamilior, is 1/4" or 5/16" diameter line as opposed to 5/8" or 1" line used by the pot fishermen. It is easy to see which fisherman will suffer loss in gear entanglements.

Since gear entanglements are a fact of life and part of the game, it is plain to see that the two types of gear cannot be used on the same ground with out serious gear loss to the hook & line fishermen.

The above facts are substantiated by an actual incidence of hook and line gear set over the same ground as pot gear.

The event happened in Oct. 1975 in Chatham Straits. The boats involved were the Miss Aurora, a 44 foot steel vessel owned and operated by James Cooper, home port Sitka.

Alaska, and a 50 foot steel boat out of Seattle, the name of which has been forgotten. There is no log to confirm the incedence as it was lost when the Miss Aurora capsized and sank during a storm in 1976.

The loss to the Miss Aurora in gear, fish, and lost time was in the thousands of dollars.

For the Commission to even consider allowing pot gear to be fished in the same waters as traditionally fished by hook and line fishermen is

inconceivable. Or, could it be that this is an underhanded attempt to phase out the long line fishermen of Alaska.

11-27-84

Dear J.L.F.A,

I'm writing this letter with deep concern for the blackcod fisheries in Southeast Alaska. My two main concerns deal with the present openings and the number and types of boats now harvesting blackcod in Southeast. My first concern - the openings - greatly effects myself and many other fisherman like me in Southeast. The present opening in January has very drastic effects on me. A January opening forces us to go make our living durning a time of the year that threatens my life as well as my family and friends. A small boat

operation like our cannot go out and make a living in January because of obvious reasons - the weather. It does however, enable large boats from south to go out and harvest a large portion of the blackcod quota before we are even able to start fishing. These boats are so large that they are able to fish here in January and when this quota is full they can also go handle the weather westward, where we are not able to do this. I do not understand why the boats from south are allowed to come up to southeast and fish out our fish and rob ~~of~~ us of our lifestyle after they have roped and ruined their own fisheries along the western coast. I'm pleading with you

to consider a later opening (March) to at least give us a chance to harvest our own fisheries and continue to be honest, hardworking ~~citizens~~ residents of the State of Alaska. Where will we be when we are unable to continue to make a living? Who is going to pay our bills and feed our children when the large boats from south put us out of business?

Secondly, I'm very concerned with the the numbers and types of blackcod boats entering the Southeast fisheries. I have a reasonable amount of experience fishing blackcod in Southeast with some of the most experienced fisherman here. Durring my fishing experience I have seen the damage that large pot boats

can do to the smaller, local fisherman in Southeast. These pot boats come onto our grounds and have no concern for us or our gear. They come up and pick out a boat, figuring if we are fishing there - there must be good grounds. They come set us down and literally run us off of our grounds. We get run off of our grounds because we have no defense when there are several two to three hundreds of pounds of pots threatening our whole string of gear. The pot boats cut our gear - which causes a great financial loss to us. Consequently, we must literally move our gear in the middle of our trip to avoid loosing all of our gear to people that shouldn't even be allowed to be fishing in

Southeast. I deeply feel that if these large pot and freezer boats are allowed to continue fishing in Southeast it will literally ruin the grounds that are presently producing and sufficiently keeping the local fisherman alive.

Why is there not a limit to the number of boats that can fish in Southeast? Every year we are cut to a shorter and shorter fishing season because of the number of boats and permits entering Southeast. I feel that <u>we</u> <u>must</u> <u>take</u> <u>action</u> <u>now</u> while there still is a fisheries to fight for. We must also do something to keep the pot and freezer boats out of Southeast.

I remember just a few years back when we used to go into

Chatham Straits when the weather was too bad on the outside waters to fish. There were only a handful of boats in Chatham and we used to fish into the winter months. Now, we are allowed five lousy days in Chatham. We are forced to work day and night for five lousy days and nearly fight for a place to put our gear down. Is this what we have to look forward to in our fisheries? What has become of blackcodding? And what lies ahead in the future for blackcodding in Southeast when there are very definate circumstances threatening to kill the fisheries? As a local fisherman and a proud Alaskan please consider my thoughts on the future of longline

fishing in Southeast and the effects of the large freezer and pot boats on our future. Thank-you.

Sincerely,

Maura J. Phillips

Maura J. Phillips
P.O. Box 21
Petersburg, Ak. 99832

Jim Longrich
Wants Charts on back
incl in orig ltr sent to Council

(1) ~~The Alaskan~~

(1) Blackcod was an underdeveloped domestic fishery when we decided to enter. There were no rules or regulations against fishing with pots. ~~in Alaska~~

(2) We recieved encouragement to enter into + help Americanize the blackcod fishery from fishermen, processors, and managment.

(3) Since longliners have no significant catch record in the central or western gulf other than this year, in which we also helped harvest the catch.

(4) We have a significant investment in terms of time spent researching the fishery. plus a dollar investment of over 117,000 to enter into the longline pot fishery.

(5) N.M.F.S. might look into Canadian pot fishing regulations. one being a required biodegradable panel on each pot, another being the pot boat having to take all of their gear with them when the leave the grounds to deliver.

(6) We feel as United States citizens we have as much right as any user groups to help harvest the blackcod resource.

Box 3415
Kodiak, Alaska 99615
November 19, 1984

Mr. Jim Campbell
Chairman
North Pacific Fishery Management Council
P.O. Box 103136 DT
Anchorage, Alaska 99510

Dear Mr. Campbell:

Last Spring we entered the black cod fishery using 55 lb. pots spaced 25 fathoms apart on a 7/8" ground line. Our decision to use the pots was not casual. Much research (trips to Seattle and Vancouver), time (over a month of gear work for the crew, more than that for the owners), and money (over $110,000) went into making the idea a reality. During this period of research and implementation we received encouragement from processors and fishermen as all seemed excited at the prospect of the foreigners being replaced by American fishermen delivering to U.S. processors. Although we are new to longlining we have been fishermen in Alaska for many years. Due to our participation in the black cod fishery we missed two crab seasons (St. Matthew and Bering Sea) in which our sister ship and partner boat grossed $170,000. Sometimes we do better than they, sometimes worse.

At the time of the late September meeting of the North Pacific Fishery Management Council we were engaged in fishing for black cod in the Western Gulf of Alaska. We went there because the Central Gulf of Alaska had been closed to us, because we had a market in Sand Point desirous of taking our fish, and because we wanted to put in a U.S. fishing effort in this area so that the NPFMC could justify eliminating foreign effort for black cod in the Western Gulf. We are dedicated to Americanizing the black cod fishery in the Alaskan FCZ, and have been encouraged to do so by U.S. processors and fishermen. Although we do not have the exact figures at this time, we do know that our portion of the black cod harvest in the Western Gulf represented a significant portion of the overall U.S. effort in this area. Prior to the Central Gulf being closed to us because of the achievement of DAP, we also dedicated a significant effort in this area as well.

W

We understand that at the late September meeting of the NPFMC, there was testimony and discussion of the possibility of eliminating pots as a legal gear for the taking of black cod. We would like to explain our point of view in this matter, and our objection to the elimination of pots as a legal means of taking black cod.
Criticism of pot fishing for black cod seems to fall into two major categories: 1) poor quality of fish, and 2) gear conflict. The contention that pot caught black cod are of poor quality is simply

a myth. The fish are brought aboard the boat live, kicking, and healthy. The ultimate quality of the product is determined by how the fish are handled after their capture. Any small fish can be returned unharmed to the sea. Even after a much longer than average soak, say 3 to 4 days, a small fish can still be released in good condition; a claim that a hook and line fisherman cannot make. In addition to this, our pots are made of small mesh that prohibits a fish from being gilled, thus preventing mortality. Our pots will catch small fish just as a hook will catch small fish if the gear is set in the wrong place. Fishermen using all types of gear avoid setting on small fish since our markets prefer large fish and pay much more for them. Contrary to rumor, no one who has purchased fish from us has complained of poor quality due to the fish going "insane" in a cod pot, or for any other reason.

Gear conflict is perhaps the most talked about criticism of using pot gear. To this, we answer that the two forms of gear COEXIST in other states and countries and that neither type of gear seems to be going out of business as a result of the other (see enclosed article from Pacific Fishing, October 1984). If a string is lost it can be drug back; we carry a drag especially for this purpose. The pots are equipped with a biodegradable panel that will rot away, release any fish in the pot, and stop trapping fish if an individual pot is lost. If hook and line gear was set over our pot gear some hooks would probably be lost. If pot gear was set over hook and line gear the lighter hook and line gear would part and the hook and line fisherman would be forced to go to the other end of his gear to retrieve it. If the two types of gear were set exactly on top of each other, the lighter hook and line gear would definately lose. The point, however, is that it doesn't have to be a total disaster in the event of a tangle. Communication between boats and the use of plainly marked gear with buoys equipped with radar reflectors, which we have, can do much to stop a problem before it starts. (See enclosed article from the Kodiak Daily Mirror, 11/15/84.) We feel that the criticisms against using pots as a method of harvesting black cod are exaggerations and, in some cases, misconceptions.

We feel that if pots are eliminated as a legal means of taking black cod in the FCZ, we would, in effect, be legislated out of business; and our large investment in terms of dollars, time, and energy would be destroyed through regulatory action. Please consider that by making our investment in the Americanization of the black cod fishery, we did not engage in those fisheries which we otherwise normally would have engaged in, and which are considered to have excessive fishing effort already (tanner crab, king crab). Many criticisms of the pot fishery for black cod are made with the rationale of creating an orderly and manageable fishery. We believe that an orderly and manageable black cod fishery is possible using pots as well as hook and line. We have seen no information to prove otherwise. We believe in an orderly and manageable fishery; but to use this rationale to eliminate pots is a guise to justify the total taking of black cod by a specific vested interest, i.e. hook and line

fishermen. We also have a vested interest in our manner of fishing for black cod, and we would like our vested interest in our investment and in our effort to Americanize the black cod fishery recognized equally with the hook and line fishermen. Please recognize that during the long time period in which we planned and evaluated our investment decision to engage in pot fishing, there were no laws, rules, or regulations which would have led us to believe that our investment and business enterprise would be eliminated. As U.S. citizens, we feel we have a right to participate in the U.S. harvest of a resource which has been given away in the past to foreign nations, especially given our investment and participation in this fishery. Please give your consideration to our interest in remaining in the pot fishery for black cod in the Alaskan FCZ. We plan on attending the December NPFMC meeting to discuss this issue further with you and answer any questions which you may have.

Sincerely,

Tim Longrich
F/V Kodiak

P.S. I was told by a member of the Council staff that this letter would be included in the notebooks which the Council members receive for their meeting in December. Would you please include this letter in this book. Thank you.

Enclsoures

F.V. KODIAK

EXPENSES FOR BLACKCOD POT FISHING

ITEM:	COST
Ground line	24,905.48
snaps, links, bridles, poles, reflectors, misc.	5,018.55
Reel for groundline and rollers	24,965.00
Pots	37,254.50
Color sounder. 1 KW 50 KHZ, 10 KW 28 KHZ does not include installation cost for transducer.	10,800.80
Pots and groundline freight	6,305.86
Pots and reel freight	3,889.14
Mount reel and davit and misc. fabrication	3,226.40
Snaps for bait bags and tunnels, misc.	797.40
Misc.	233.00
TOTAL	117,396.00

This does not include over a month of labor for us and crew rigging gear and boat. Does not include a lot of equipment and gear that we already had that we used blackcod fishing (buoys, extra longlines, modification to our RSW system, etc.).

F.V. KODIAK

NOV. 1983 LONGRICH, Seattle - Visited fishermen, fishing gear suppliers. Talked to people at ~~NOAA~~ NMFS and gathered information about blackcod fishery.

JAN. 1984 KLEMZAK, Canada - Visited fishermen and Canadian Department of Fisheries and gathered information about blackcod pot fishery.

LATE FEB. 1984, LONGRICH/KLEMZAK, Seattle and Canada - Visited fishermen, processors and talked about pot fishery for blackcod, visited pot builders, reel builders, and fishery supply companies.

LATE MARCH 1984, LONGRICH, Seattle and Canada - Visited fishermen and processors. Ordered pots, groundline, reel for groundline, and everything else we needed to rig boat for pot fishing for blackcod.

LATE OCT. 1984, LONGRICH, Seattle and Canada - Visited fishermen and processors and refrigeration companies to discuss freezing blackcod aboard the boat at sea.

EARLY NOV. 1984, LONGRICH- Ordered refrigeration equipment; contract signed and $12,000 deposit paid. Total conversion expected to cost approximately $90,000.

F.V. KODIAK 1984

WESTERN GULF BLACKCOD CATCH

DATE	FISH TICKET #	POUNDAGE
9-27-84	J 1040332	22,807
9-29-84	J 1040333	9,010
10-5-84	G84 001551	17,063
10-11-84	G84 001569	19,550
10-17-84	G84 001553	3,289
10-17-84	G84 001554	29,584
10-22-84	J 1040337	18,999
	TOTAL	120,302

120,302 ÷ .67 = 179,552 Round Weight

1984 through October Western Gulf Blackcod Catch was 465,705 pounds (211.3 metric tons).

179,552 ÷ 465,705 = 38.5% of Domestic Catch

able 2. 1984 catches of principle bottomfish species by month and regulatory area in the Gulf of Alaska, Aleutian Islands and Bering Sea. 1/

Regulatory Area/Species	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov 3/	Total
					M O N T H							
Central Gulf 2/												
Pollock	93.5	75.3	156.9	1.6	2.6	0.0	0.0	0.0	0.0	0.0	0.0	330.5
Pacific Cod	275.8	553.7	859.6	168.8	174.3	34.9	5.5	0.0	6.3	70.4	31.4	2,180.7
Flounder	69.1	73.8	84.7	8.6	3.6	0.0	0.0	0.0	0.0	0.0	0.0	239.8
Sablefish	3.5	7.3	79.0	13.8	77.1	449.3	572.8	526.7	556.3	39.3	1.2	2,326.2
P.O.P.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Western Gulf												
Pollock	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Pacific Cod	12.0	0.0	0.0	3.2	1.2	0.0	0.0	1.0	7.3	4.3	5.8	34.8
Flounder	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.8	0.0	4.8
Sablefish 211.3 = 465,705	0.0	0.0	0.0	0.0	0.1	0.0	15.4	6.2	41.2	147.1	1.3	211.3
P.O.P.	0.0	0.0	0.0	0.0	0.0	0.0	25.6	48.7	10.8	0.8	30.1	116.0
Aleutian Islands												
Pollock	0.0	0.0	0.0	12.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	12.3
Pacific Cod	0.0	0.0	0.0	130.4	215.1	0.0	0.0	0.0	45.3	0.0	0.0	390.8
Flounder	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	0.3
Sablefish	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.2	0.0	0.0	2.2
P.O.P.	0.0	0.0	0.0	0.0	2.3	0.0	0.0	0.0	0.0	0.0	0.0	2.3
Bering Sea												
Pollock	0.0	0.0	0.0	128.8	20.6	0.2	88.5	823.3	80.1	9.7	32.5	1,183.7
Pacific Cod	979.5	1981.9	4,911.9	10,953.7	878.5	567.8	1,641.8	1,956.0	999.4	359.4	26.5	25,256.5
Flounder	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.6	0.0	1.0	0.2	3.8
Sablefish	0.0	0.0	0.0	3.6	16.4	11.2	7.5	163.7	197.9	22.5	0.7	423.5
P.O.P.	0.0	0.0	6.7	0.0	0.0	0.0	0.0	13.8	577.5	444.3	109.0	1,151.3

1/ All catches shown in metric tons.
2/ South of the latitude of Cape Douglas (58°52' N. lat.).
3/ Summarized on 11/21/84. November 1984 catches are probably incomplete.

Table 1. Annual domestic catches of principle bottomfish species in the Gulf of Alaska, Aleutian Islands and Bering Sea by regulatory area, 1975-1984. 1/

Species	Regulatory Area	CALENDAR YEAR 1975	1976	1977	1978	1979	1980	1981	1982	1983	1984
Pollock											
	Central Gulf 2/	0.0	0.0	46.7	491.8	1,464.9	478.5	557.6	2,128.4	111.0	330.5
	Western Gulf	0.0	0.0	0.0	0.0	0.0	0.0	0.3	61.5	24.1	0.0
	Aleutian Islands	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	71.3	12.3
	Bering Sea	0.0	0.0	0.0	23.2	7.6	60.4	0.0	67.3	911.9	1,183.7
Pacific Cod											
	Central Gulf	85.3	155.1	156.3	595.7	856.5	458.0	754.3	1,883.2	4,028.6	2,180.7
	Western Gulf	1.3	13.3	54.1	61.4	0.0	5.3	257.0	274.3	263.7	34.8
	Aleutian Islands	0.0	0.0	0.4	4.3	2.3	0.0	2,733.7	2,158.5	2,984.3	390.8
	Bering Sea	0.0	0.0	15.1	30.7	780.1	2,432.6	3,863.8	13,124.9	34,315.3	25,256.5
Flounder											
	Central Gulf	4.1	24.5	11.2	81.8	29.0	1.6	42.7	3.0	41.7	239.8
	Western Gulf	0.0	0.0	0.0	5.9	0.0	0.0	0.0	0.0	6.8	4.8
	Aleutian Islands	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3
	Bering Sea	0.0	0.0	2.3	0.0	0.0	88.2	0.0	4.8	3.4	3.8
Sablefish											
	Central Gulf	0.0	0.0	0.0	0.4	37.3	16.1	6.3	9.6	213.0	2,326.2
	Western Gulf	0.0	0.0	0.3	0.0	0.0	0.3	0.0	0.0	10.0	211.3
	Aleutian Islands	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	24.9	2.2
	Bering Sea	0.0	0.0	1.6	0.0	0.0	0.0	0.0	115.5	29.1	423.5
P.O.P.											
	Central Gulf	0.0	0.0	0.0	0.0	0.0	1.6	6.2	1.7	0.0	0.0
	Western Gulf	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	116.0
	Aleutian Islands	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.3
	Bering Sea	0.0	0.0	0.0	0.0	0.0	0.0	0.0	9.5	14.6	1,151.3

1/ All catches shown in metric tons. Represents catch data received through 11/21/84 only. November catches maybe incomplete.

2/ South of the latitude of Cape Douglas (58°52'N. lat.).

HISTORICAL CATCH 1975-1984