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). 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. Gulf of Alaska Plan Team was directed to follow up the emergency rule with a In the meantime, Congress amended the Act to put the plan amendment. 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.

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. 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.

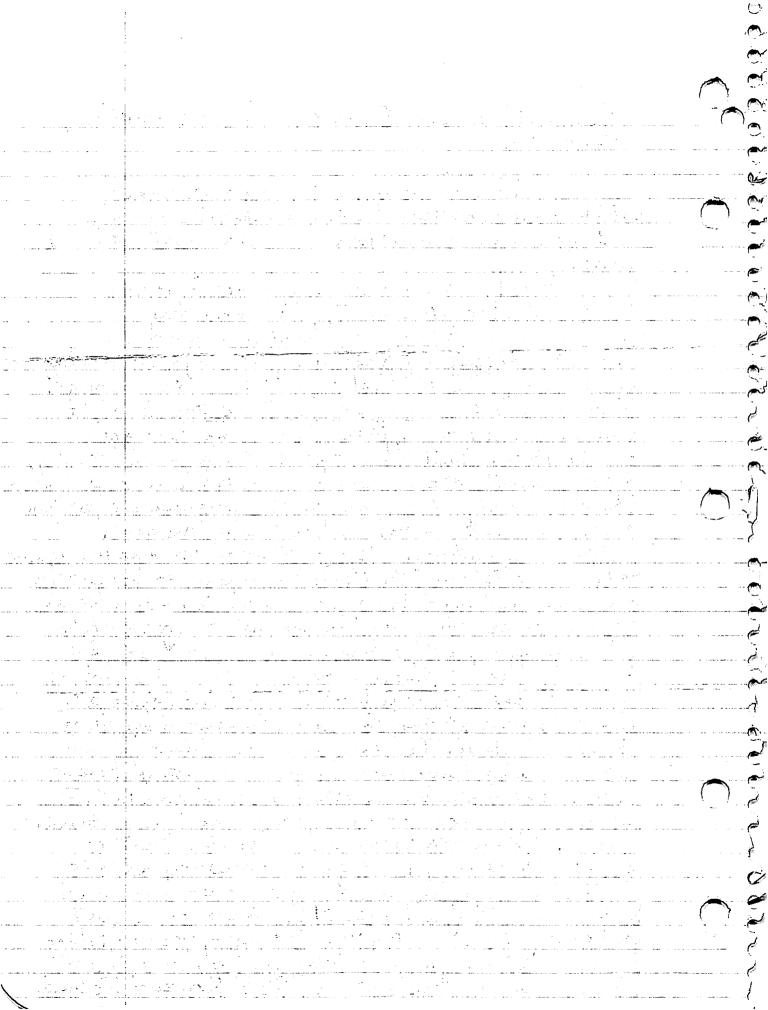
Scientific and Statistical Committee, Deur SMS,

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

First, as a crewman aboard, a local S.F. Alaska, longline boat, I've had the unpleasant experience of having a good black eod trip disrupted half-way through by meeting up with a pot boat fishing our traditional ground. Had this been a long line hookand 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 gent that is easily lost, makes the presence of potgear extremely detrimental to hook and me gear. Upon encountering the pot boat on one particular trip on the "Aloha" in April '79 we were forced to thus a around and fish ground that we'd already fished, since, due to his somewhat erratre style of fishing and the fremendous amount of gew he had placed in the water, we didn't know where his set gew was gor where he had lost gew at. His gew was strung for nearly the entire length of Kruzof Island. To fish where we know he had been, would have been too much of arisk to our gear. The fishable depth for black cod in S.E. Alaska is a very narrow strip along the continental smelt. 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 potgear 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 offof 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" ny lon, I was very concerned. We broke that end off after trying everything to get it loose and away from the pot gear. Same thingon 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. '4" rope is no contest to 1".

Not country the fish lost on the gear, and lost from time time. fishing time, and crew's time making up new year etcoso our monetary loss was \$1600. Doviously there are hidden costs involved. The proportion once productive spot where his lost gear is, still cannot be fished by hook at line gear and probably will not be able to be in my lifetime. I'm 28. It is potgew no tonly is in the way, it's still fishing. So-called him to be in the way, it's still fishing. bio-degradable panels or hot ... The Southeast, Alaska blackcod fislery is shorter, more crowdedevery year. There simply is no roome for pot fishing, dragging or means other than long line hook and line plant and line We have an existing, traditional hook and line fishery that is in creasingly more regulated. The correct fishery is producing the finest quality lish. 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 knownit. Sincerelly Greg Cushing 747-*3035* 150 X 16 4

Sitka AK 99835

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.

Lincerely Brain & Blankuships To the North Pacific bacagement Jongoil:

We on the Rose-Lyan fish out of Sitka and have been doing so since 1975. The area in which we longtine blackcod has several strings of blackcod pots vision were lost a few years ago from the F/V Billy-Don. We've lad the unfortunate experience of targling up with this dorelict gear several times, once losing it sketes of gear, an anchor, and shot line and several times just stripping hores off the gear.

Ithow of green ther confident such this sucher letter lander letters letter let

I had the opertunity to speak to three ore man who had just with shoard the pot boat the P/V Salty II this sugmer. According to then everytine they became antangled in historical longility goar, the skippers, (two Canadians) would order the grawmen to out the longility gear. This was done no mather whose fault it was that the gray was tend the gray was tend to was done without retiefy the lines. This meant gear loss and it was done without retiefy the lines. This meant gear loss and extra time fincking the record ends to the langines involved.

The longity fles here has shown it oad and will havvest the hisokood enote in the Guif of Alaska. It was the persistance of the longites first pushes hisokooder factor of the longit, not the pot beate or the drangers. One last thing sout the pot beats they croses every blackers that comes the pot by freezing there ever blackers that comes over the side by freezing then onboard. We longither have a minimus aire of formula drange dies winimus size of formula drange a minimus size of formula drange design which makes the fishory more selective and heter 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.

Texter B. Vile

Dexter B. Kyle

2213 Saymill Creek Rd., Star Route Sitke, Aleska 99935 December 3, 1984

North Pacific Fisherics Spirgement Council Sox Stes Anchorage (Alaska 8881)

Dogu Sins:

This letter is in reference to gear confilets between longline and pet gear. On July 1. 1911, fishin on the Loren scordinared 19475 and 26501, which is approximately if appreciately in a provided by its configuration of the configuration of the configuration of the second string was pertially tangled and there was carried dample to the last half of the string. The second string was tangled will the way and was extremely slow and any operation to pull. Then it was tangled of the dampered to pull. The second of the dampered to pull. The second of the dampered that the test one of the new gear. I found that we would have often any of it back. As it was we now gear, I found that we would have often any of it back. As it was we lost as reating the mess and replacing hooks and engions. There days work in town untangling the mess and replacing hooks and engions. Probably the only good thing that happened was that we recovered approximately 100 fathous of 1./6-1. The olypropolene por longline. I have taken the dates and figures from it, to book, and I could supply copies on request.

This eres has been one of my big producers down through the years and now will be impossible to fish with longitue gear for many hundreds of rears. If not bosts are allowed back in Southeast, the repetitions of this scenario will be the demise of longituing.

्र एम.ल<u>ू.क्</u>यूतां उ

Dexter B. Kyle

December 2, 1984 Box 1578 Kodiak, Ak. 99615

Jim Campbell, Chairman North Pacific Fishery Management Council P.O. Box 103136 Ruchorage, 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 doday'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,

Sincerely,

Junathy Joyner, Ph.D.

Sheldon Jackson College

[•] Former Director, Aquatic Resources Improvement and Environment Serice 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% <u>Fish Tax</u>
4,000,000 lb.	#.70/1b.	\$2,8000,000	\$84,000

Potential Wages Available from Sablefish Deliveries

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

Sablefish Fishing Expenses and Local Tax Received to Sitka

Expense	\$Dollar Value per Trip	Trips	<u>Total</u>	Sales Tax	<u>Tax</u>
Fuel Food Bait & Ic Gear Misc.	600 700 e 1000 300 500	221 221 221 221 221 221	\$132,600 154,700 221,000 66,300 110,500 \$685,100	4% 4% 4% 4% 4%	\$ 5,304 6,188 8,840 2,652 4,420 \$27,404
			Fish Tax to	Sitka	\$28,000
	••		Total Taxes from Sablefi		\$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.

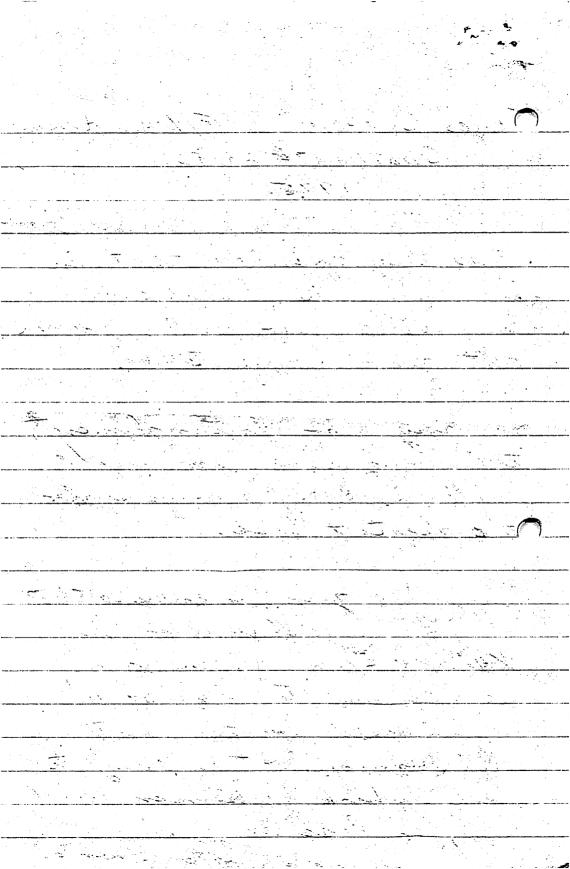
Kodiak 3,394,160 lb. Seward 2,500,000 lb.

From Alaska, Dept. of Fish and Game From Sitka Economic Base Study 1984. Total Sitka Wages is \$83.7 million The average wage per settlement from 6 Sitka fishing vessesIs 6 Dec. 1984, Michael J. Mayo

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

DISTRICT Eastern Gulf:	MT RO	OUND WT. LBS	DRESSED WT.	VALUE (\$.70/1b)	FISH TAX
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
The state of the s	8,514	18,764,856	13,135,399	\$9,194,880	\$275,845
Less: Fish Delivered Outside Alaska Central Gulf Eastern Gulf	11 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

ill or in Lorendo TAMES COOPER F/V MISS AURORA CHATHAM STRAITS It is my opinion that in no way is blacked long line gear and blacked 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 unfamiliar, is "4" or 5/16" diameter line as approved to 5/8" or 1" line used by the pot fishermen. It is easy to see which fishermon will suffer loss in geor entanglements.

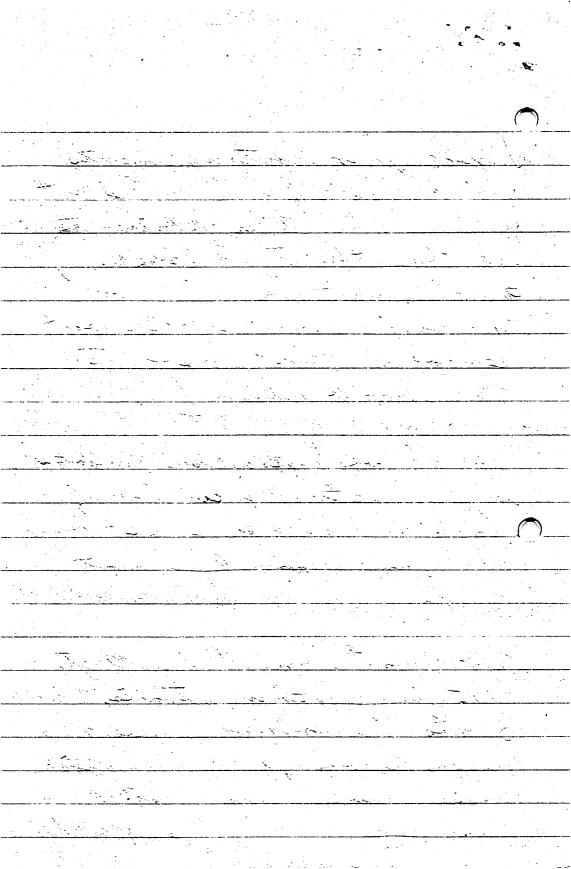


Dince gear entanglements of the game, it is plain to see that the two types of gear connot be used on the same ground with out Serious geor loss to the book & line fishermon. The above facts are substantiated by an octual incidence of hook and line geor set ones the same ground as pot The event happened in Oct. 1975 in Chatham Straits. The boats servolved were the

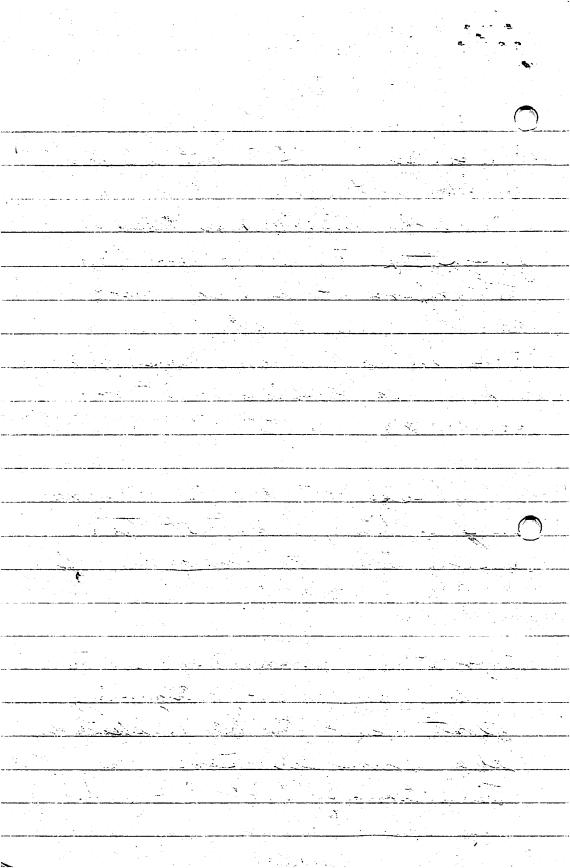
Miss aurora, a 44 foot steel

vessel owned and specifed by

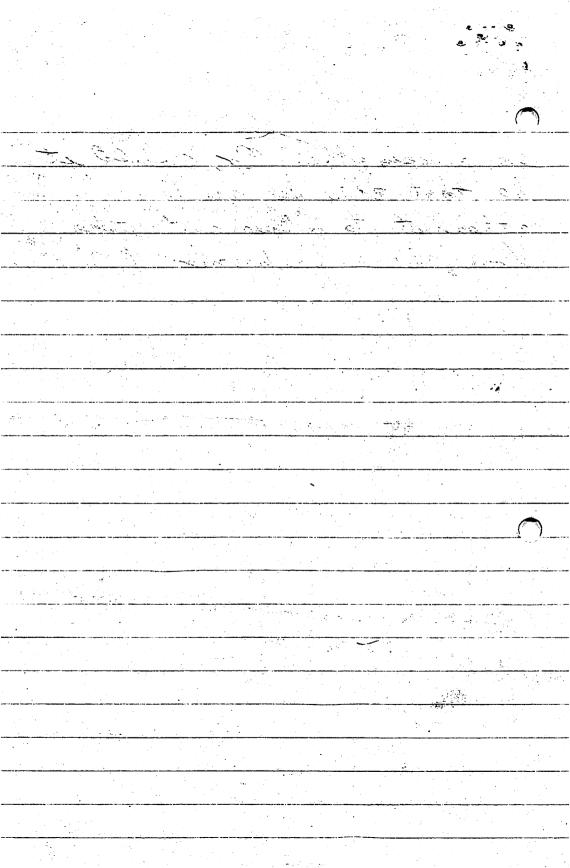
James Cooper, home port dether,



Olaska, and a 50 foot steel boat out of Scattle, the rome of which has been forgotten. There is no log to confirm the incedence so et was lost when the Miss Ourora Capsized and sank during a stoom in 1976. The loss to the Miss Rurora ageor, fish, and lost time was in the thousands of tollors. 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

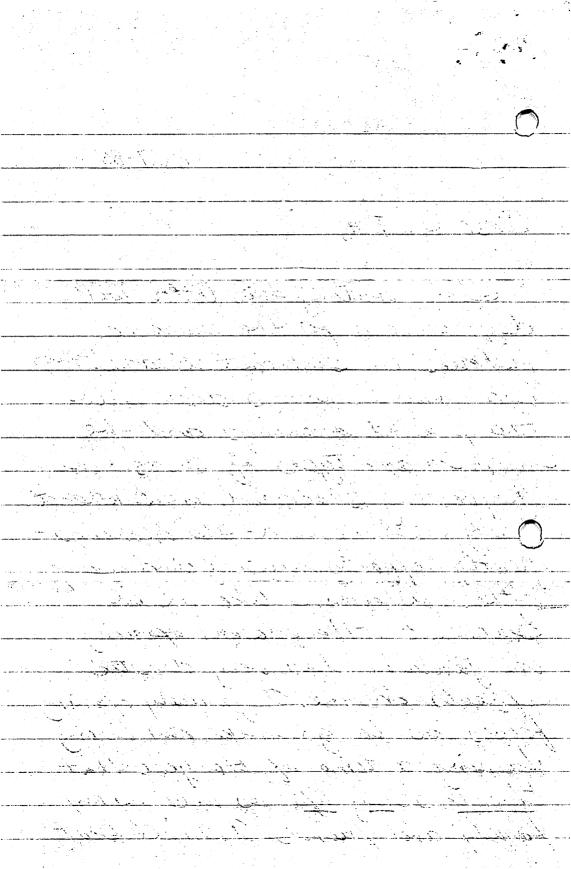


inconseivable. Or could et be that this is an under-handed attempt to phase out the long line fishermen of Alaska.

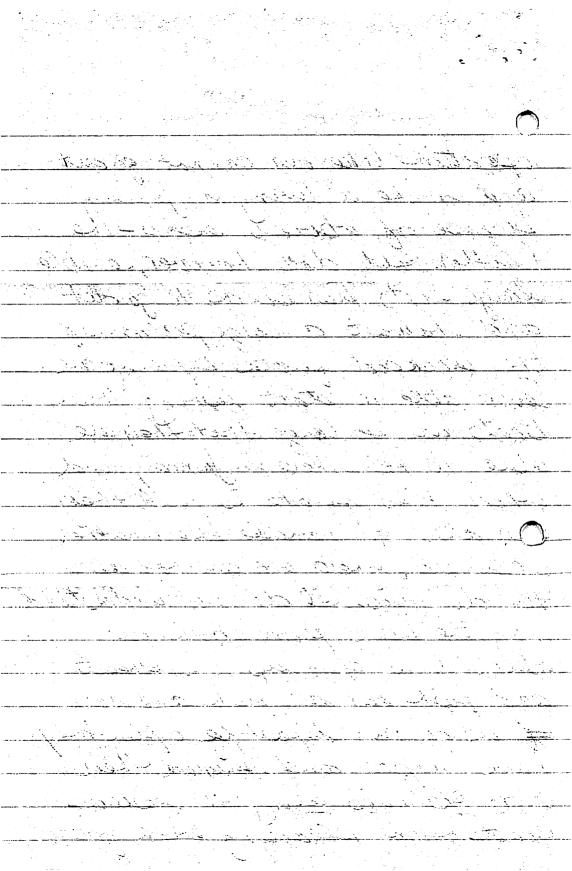


Dear J.L.F.A,

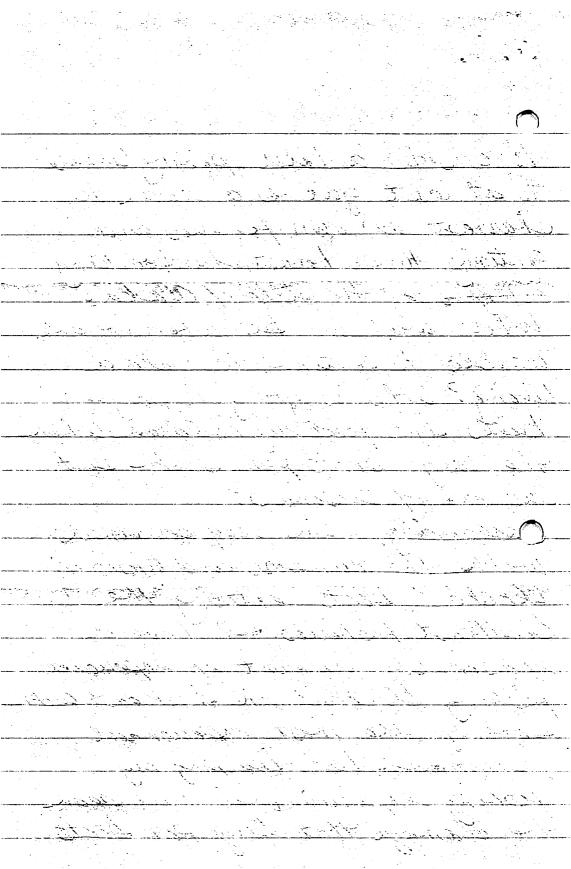
I'm writing this letter with deep concern for the blackcod fisheries in Southeast alaska. My two main concerns deal with the present openings and the number and types of boats now harvesting black cool in Southeast. My first cencern- the openings greatly effects nupel and many other fisherman like me in Southeast. The present opening, in January has very drastic reflects on me. a farmary opening forces us to go make our living durning a time of the year that threaters my life as well as my family and fuerds. a small Doat



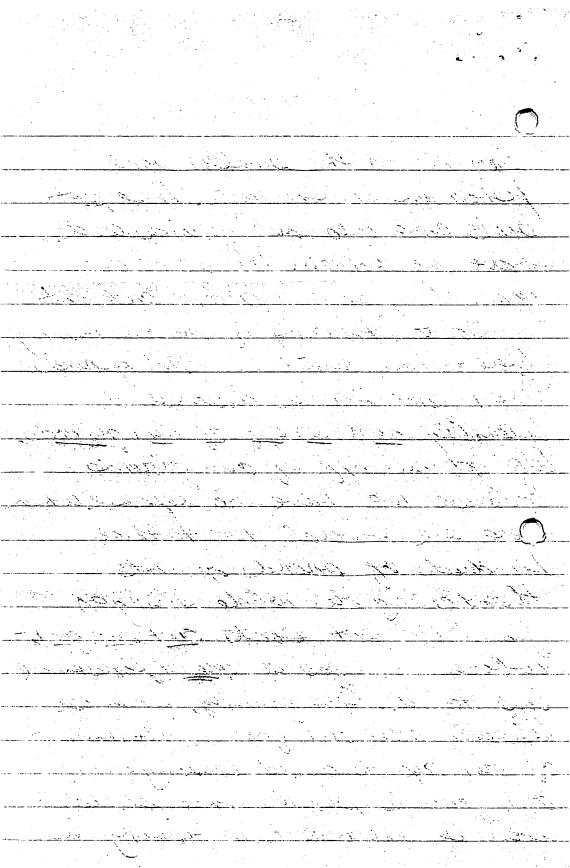
operation leke our cannot go out and make a living in January because of obvious reasons—the weather. It does however, enable large boats from south to go out and larvest a large portion of the blackcool quota before we are even able to start fishery, These boats are so large that they are able to fish hero in January and when this gerata is full they on also go tandle 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 southeat and fish out our fish and rob of us of our lifestyla after they have roped and ruined their own fisheries along the western coast. I'm pleading with you



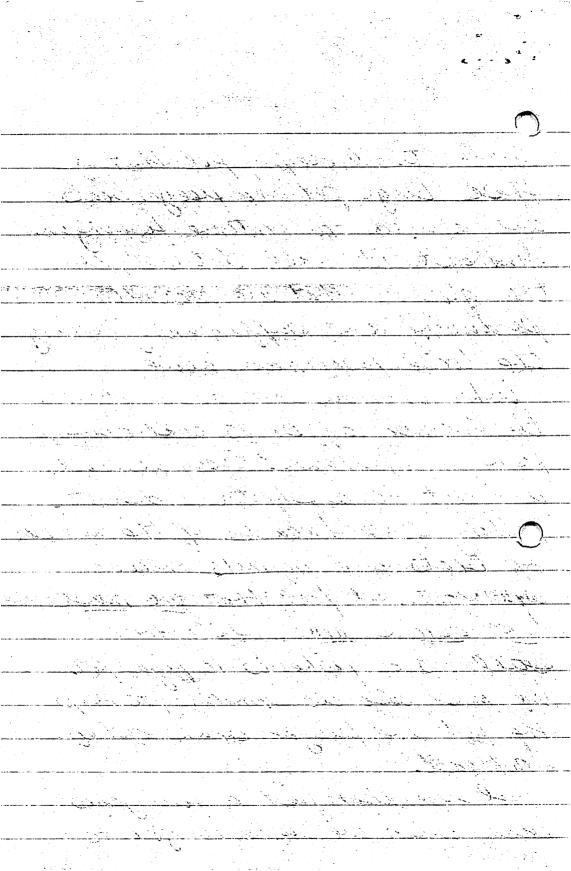
to consider a later opening (March) to at least give us a chance to charvest our own fisheries and centinue to be horest, hardworking residents of the State of alaska. lutero will we be when we are unable to continue to make a living? Who is going to payour bills and feat our cheldren when The large boots from south put us out of business? Secondly, I'm very concerned with the rumbers and types of blackcod boats entering the Southeast fisheries. I have a reasonable amount of experience fishery blackcool an Southeast with sime of the most experienced fisherman here. Durning my fishing experience I have seen the clamage that large pot Doats



can do to the smaller, local festerman in Southeast. These port boats come onto our grounds and have no oncern for us or our gear. They come up and pick out a boat, figuring if we are festing there. There must be good grounds. They came set us down and literally run us off of our grounds. We get nen off of our grounds because we have no defense when Tere are several two to three hundreds of pounds of pots threatening our whole string of glas. The pot boats out our gear, which causes a great financial loss to us. Consequently, we must leterally more our gear in the meddle of our trip to avoid loosing all of our gear to people that shouldn't leven be allowed to be fishing in

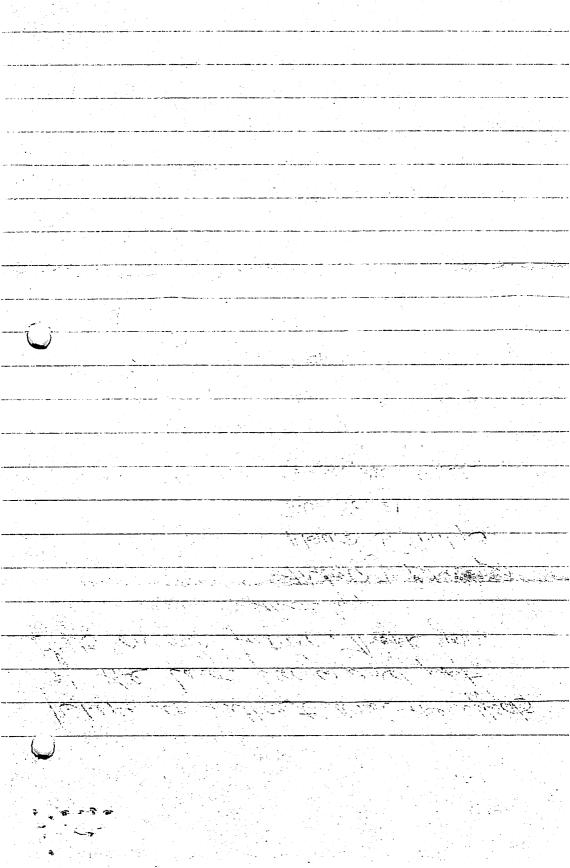


Southeast. I deply feel that if these large pot and freezes boats are allowed to continue fashing in Southeast it will leterally run the grounds that are presently producing and sufficiently keeping the local festerman alive. Why is Here not a limit to the number of boats that can fish in Southeast? Every year we are cut to a Shorter and Shorter shing season because of the number of boats and permets entering Southeast. I feel that we must take action now while there Still is a fisheries to fight for. We must also do smething to keep the pot and freezer boats out of back when we used to go wito



Chathem Stratts 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 lowey days in Chatham. We are forced to work day and night for five lowey days and really fight for a place to putous gear down, Is this what we have to look forward to on our fisheries? What has become of black codding? And what lies ahead in the future for black colding in Southeast when Here are very defenato Cercumstances Accatering to kell the fisheries? as a local fesherman and a proved alastan please consider my Houghts on the future of longline

had in it will all the first of the first The state of the s Musey Court of the first the property fishering in Southeast and the effects of the large preeyer and put boats on our future, thank-you. Sincerely, Maura J. Phillips Maura J. Phillips P.O. Box 21 Petran, ak. 99832



Dim Longrich Wants Charts on back to Cacle Blackwood was an undeveloped domestic fishers when we decided to enter. There were no rules or regulations against fishing with pots. We recieved into enter into + help Omericanize the blackcool fishery from fishermen, processers, and management. social tomplines have no I significant catch record in the central or western gulf other than this years, in which we also helped harvest the eatch. We have a significant investment in terms of times researching the fishery. # plus a dollar investment of own 117,000 to enter into the longline pot fishery. N.M.F.S. might look into as Canadian pot fishing regulations. me being a required biologists panel on each pot, another, being the pot boat having to take all of their year with then when the leave the grounds to deliver. have as much right as any user groups to help havent the blackcool resource.

Chronic ross have ; or

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.

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. 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 (See enclosed article from the Kodiak Daily Mirror, 11/15/64.) 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 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 gngage 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

<u>ITEM</u> :	COST
Ground line	24,905.48
<pre>snaps, links, bridles, poles, reflectors, misc.</pre>	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	10,800.80
does not include installation cost	
for transducer.	
Pots and groundline freight	6,305.86
Pots and reel freight	3,889.14
Mount reel and davit and misc. fabricatio	n 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.).

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

N.M.F.S.

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 9-29-84 10-5-84 10-11-84 10-17-84 10-17-84 10-22-84	J 1040332 J 1040333 G84 001551 G84 001569 G84 001553 G84 001554 J 1040337	22,807 9,010 17,063 19,550 3,289 29,584 18,999
	TOTAL	120.302

 $120,302 \div .67 = 179,552$ 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/

		····	-		М	0 N	ТН					
<u>legulatory Area/Species</u>	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	0ct	Nov 3/	Total
entral 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
lestern 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 = 463 70	5 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
Neutian 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	2.2
3ering 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		
Sablefish	0.0	0.0	0.0	3.6	16.4	11.2	7.5	163.7	197.9	22.5	0.2	3.8
P.O.P.	0.0	0.0	6.7	0.0	0.0	0.0	0.0	13.8	577.5	444.3	0.7 109.0	423.5 1,151.3

All catches shown in metric tons.

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

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/

Regulat			CALENDAR YEAR									
Species Area		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	2 120 /	111 0	220 5	
Western Gulf		0.0	0.0	0.0	0.0	0.0	0.0	0.3	2,128.4	111.0	330.5	
Aleutian Isl	ands	0.0	0.0	0.0	0.0	0.0	0.0	0.0	61.5	24.1	0.0	
Bering Sea		0.0	0.0	0.0	23.2	7.6	60.4		0.0	71.3	12.3	
น้			0.0	0.0	23.2	7.0	00.4	0.0	67.3	911.9	1,183.7	
Pacific ℃ od												
Central Gulf		85.3	155.1	156.3	595.7	856.5	458.0	754.3	1,883.2	1 020 6	2 100 7	
Western Gulf		1.3	13.3	54.1	61.4	0.0	5.3	257.0	274.3	4,028.6	2,180.7	
Aleutian Isl	ands	0.0	0.0	0.4	4.3	2.3	0.0	2,733.7		263.7	34.8	
Bering Sea		0.0	0.0	15.1	30.7	780.1	2,432.6		2,158.5 13,124.9	2,984.3	390.8	
					.,	700.1	2,432.0	3,003.0	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	11 7	220 6	
Western Gulf		0.0	0.0	0.0	5.9	0.0	0.0	0.0	0.0	41.7	239.8	
Aleutian Isl	lands	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	6.8	4.8	
Bering Sea		0.0	0.0	2.3	0.0	0.0	88.2	0.0	4.8	0.0	0.3	
Sablefish												
Central Gulf	=	0.0	0.0	0.0	0.4	27 2	16 1	6.6				
Western Gulf		0.0	0.0	0.3	0.0	37.3	16.1	6.3	9.6	213.0	2,326.2	
Aleutian Isl		0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.0	10.0	211.3	
Bering Sea		10.0	0.0	1.6	0.0	0.0	0.0	0.0	0.0	24.9	2.2	
3) "."	0.0	1.0	0.0	0.0	0.0	0.0	115.5	29.1	423.	
P.O.P.												
Central Gulf	F	0.0	0.0	0.0	0.0	0.0	1 6	6 0	1 7	0 0		
Western Gulf		0.0	0.0	0.0	0.0	0.0	1.6	6.2	1.7	0.0	0.0	
Aleutian Isl		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	116.	
Bering Sea		0.0	0.0	0.0	0.0		0.0	0.0	0.0	0.0	2.	
, J 200		0.0	0.0	0.0	0.0	0.0	0.0	0.0	9.5	14.6	1,151.	

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

HISTORICAL CATCH 1975-1984

 $[\]frac{2}{4}$ South of the latitude of Cape Douglas (58°52'N. lat.).