

*not electronic
C-6*

Michael J Mayo

12/9/2014

F/V Coral LEE

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North Pacific Fishery Management Council

605 West 4th, Suite 306

Anchorage, Alaska 99501

Re: C-6 GOA Sablefish Longline Pots

Dear Council Members, I have been fishing sablefish in the Gulf of Alaska [GOA] since 1978 and in the BS [Bering Sea] for over 25years. I stopped running my boat, F/V Coral Lee for black cod in the BS 5 years ago. However, my boat still fishes for black cod in the BS and we are familiar with fishing near sablefish pot boats. There are a few problems that we have experienced. Some of them are:

1] Sometimes the sablefish pot boats [SPB] leave the gear unattended. When you want to set the grounds if you are fishing with hook and line and come across a SPB's gear you have to figure out which way the SPB have set their gear. If you set over them you have a good chance of losing your gear. I have fished for sablefish in the BS continually since 1983[approximately, maybe 1982 or 1984]. Until the SPB arrived I had never lost a string of gear fishing in the BS from Dutch Harbor to Kiska. When we started fishing in the BS there we were quite green. I remember one early trip when we had to take a day off of fishing to untangle snarls to have gear to fish but still didn't lose a string of gear. ? Now, about every other year we lose a full string of gear in the BS. So, when we didn't know what we were doing we didn't lose any gear. With 20 years of experience we start to lose a string of gear approximately every other year in fishing around SPB's. I remember one time in the BS we came across a SPB that left his gear out fishing while he went to Anchorage. I guess he forgot to leave his cell phone on the buoys so I

could give him a call in case i wanted to fish in that area. It can be quite a challenge fishing around SPB's.

2] Hidden Pots. There are also grounds that we used to fish that we can't fish anymore because of either lost pots or pots that are 'hidden'. What is hidden? Hidden is when the buoy line from the SPB pull the buoys below the water. You can talk to brown crab fishermen who have waited for a week for their gear to materialize or rather their buoys to come up from being down. Because they use heavier buoyline their 3/4in to 1in or more buoyline sinks easier in the currents. The larger size buoyline 'sinks' [pulls the buoys below the surface of the water] the markers of the SPB's gear. The 3/8in of hook and line fishermen is more current resilient. I remember fishing the Western Gulf for black cod in the early 80's and setting over the F/V Courageous, a SPB. I didn't know that I had set over him. I looked over the grounds and there were no buoys in sight. So I set the gear. A few hours after setting the gear the Courageous showed up. He informed me that he was waiting for his buoys to come up which had been down for a week. Some strange fate betook me and when he hauled up my gear with his and turned on it he cut his own gear with his prop cutters and not mine. Luck was on my side that time. I got my gear back and didn't lose any. This was the first time and last time i was so lucky in interacting with pot boat gear and not losing my fishing gear. Sometimes the SPB's buoys stays below the surface of the water but still move back and forth with the tide. One cannot see the buoys so you can think it is safe to set the gear. You set your gear and the buoys and buoyline of the SPB can take your buoyline down and you cannot find your gear without ever seeing what has happened. I feel certain this has happened because of gear markings [buoys and flagpoles] disappearing in grounds that I used to fish without any trouble.

3] Ground Preemption: This can happen from either of the first 2 reasons or because of the SPB losing their gear. I have been removed from some fishing grounds in the BS because of the SPB's lost gear. As they lose more gear then the grounds for fishing with hook and line gets smaller. It can be quite a challenge fishing around SPB. In southeast Alaska for many years i fought lost gear off of Kruzof Island after the F/V Billy Dawn [a SPB] lost their gear in the 1970's. Of course the ground lost can be the better fishing grounds. As you accumulate experience fishing you tend to find better fishing grounds. Allowing SPBs to fish carte blanche in the GOA would definitely restrict the hook and line fishermen over time from fishing the better fishing grounds.

4] Ghost Fishing: This is when the lost gear continues to fish. Usually when hook and line gear gets lost the hooks lose their bait and the gear tends to ball up, thereby decreasing ghost fishing. When SPB gear gets lost it can continue to fish. In the sablefish fishery off of British Columbia [B C] they have required the pots [called traps in Canada] to have two escape rings [no smaller than 8.89cm] besides escape panels in each pot. One thing they haven't done is to do a study of the destructibility of the cotton mesh escape panel in the depth that the pots are fished. Because of less oxygen at the depth fished the escape panels do not degrade as if it were fished in shallow grounds. Why the escape rings? This allows the smaller sablefish to escape if the pots are lost. It also reduces cannibalism of the larger fish eating the smaller fish when they are together for a long period of time.

5] Options on allowing SPB gear.

a] Only allow enough pots to be fished which would customarily be fished with hook and line gear. If a string of hook and line gear would be equivalent to 20 pot then only allow 60 pots to be fished. If 40 is equivalent to a string of gear allow 120 pots per boat. This would keep the grounds cover at the same cover ratio and not allow the SPBs to corral the best fishing grounds.

b] As in the Canadian sablefish fishery, control the time the pots can be left fishing. Off B C the pots have a maximum soak time of 48 hours. This is done according to Fisheries and Oceans Canada to reduce wastage. It would also help to alleviate gear conflicts

c] A requirement as in BC to report lost pots. It would also be a good idea to let the fleet know where the pots are lost. That is, publicize it. This is important as to alert the hook and line fleet to be cautious when fishing in a certain area where there is lost SPB gear. This could help minimize gear lost and conflicts.

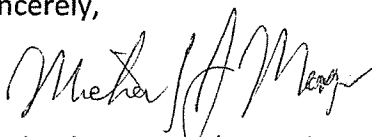
d] Do not allow SPB gear to be left on the grounds unattended. This way upon seeing SBP gear the hook and line fisherman can try to contact the SPB to see where his gear is. Also, if, per chance, the SPB gear is down [that is, not visible because of the currents] the hook and line fisherman may be able to spot the SPB and find out where the gear is set so to reduce conflicts and gear loss.

e] Require that the SPB gear is marked with buoys and flagpoles. Sometimes just buoys are used when fishing pots. Without the flagpoles the buoys are harder to see. This again would

help minimize gear conflicts.

f] Restrict areas where BPB gear can be fished. Eventually over the course of years many pots will be lost. This could preclude hook and line fishermen from fishing traditional fishing grounds because of losing their gear while tangling with pot gear or being afraid of losing gear. Therefore, until it can be proven that SPBs will not preempt all the grounds from hook and line boats some grounds should be restricted so as to not allow the SPB to fish all the grounds.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Mayo". The signature is written in a cursive style with a large initial "M".

Michael J, Mayo F/V Coral Lee