

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL
October 5-13, 2015 — 225th Plenary Session
Anchorage Hilton Hotel

Public Comment of Ludger W. Dochtermann, F/V NORTH POINT, STORMBIRD
Email submittal — npfmc.comments@noaa.gov

RE: C-2 GROUND FISH SPECIFICATIONS

Secretary Pritzker, Chairman Hull & NPFMC Members:

I'm Ludger W. Dochtermann of Kodiak, Alaska – an IFQ Halibut holder in the Longline gear segment, in the Central Gulf and Bering Sea. I fish 'hooks on gangion' tub gear for halibut. In any case, we sometimes encounter Red Rockfish, which of course perish from bathymetric shock. Sometimes the amount can be substantial – even though not as prevalent as the days back before trawlers wiped clean Portlock or other grounds. We don't want to violate a regulation in any case, so the regs may need some housekeeping or adjusting to accommodate.

Part of my understanding is that the plan team recently discussed demersal rockfish and that the SSC will be addressing groundfish specifications beginning Monday, October 5, 2015 at 1:00 pm AST. I'm fathoming that near bottom rockfish is primarily about Yelloweye Rockfish.

I also understand IFQ related retention requirements for the primary species-managed rockfish of Pacific Ocean Perch, Northern and Dusky Rockfish. I understand the low Incidental Catch Allowance (ICA) rates, and possible up-tick should over 90% be harvested by "entry level longliners," – though the Rockfish Program was jammed down our throats without full consideration that traditionally we landed rockfish before their destruction gear took over the ocean bottom.

What do I/we want? It's simple. **While halibut fishing, we want to be able to keep any and all rockfish (generally, the reds) that we haul up on our longline gear.** We're not species or species-complex experts, especially our crew on deck.

We want expansion of the ICA percentages, or MRA or whatever regulatory mechanism you use to allow this unrestricted access; i.e. no penalties for any retention year around, for these non-target rockfish – as species or complex managed. If you want to set aside 10% of the total rockfish TAC, 8% or whatever, that's ok too. (Why not 20%?) Just make it simple for us to keep them and deliver all of our rockfish

shoreside.

While I understand you apparently have no say over the processor-buyers, nor over fair pricing, even though it seems at odds with the economic realities that you have awarded processor quotas rights – like in my crab fisheries – that are noncompetitive or other anticompetitive practices. Plenary power in the buyers’ market is a form of price-making in violation of antitrust principles.

For these valuable rockfish, we merely get a few dimes per pound in Alaska – poor compensation and an unfair price about which we can do nothing. Some processors even instruct longliners “don’t bring your rockfish here!” You know many of them are 100% foreign owned. That’s pathetic when it comes to National Standard 1 and what’s best for the nation. Why restrict us to the cartel of shoreside plants? What will changing ocean conditions mean?

It’s prohibitively expensive in time and money to attend the October session, and hard to get 1,500 plus longliners publicly involved, but it is such a simple matter. Just fix it please. Hook and line should not have to be encumbered by the ridiculous Trawl Rockfish Program, by low ICA percentages or other inadequacies. Confusion already may cause some fishermen to unknowingly discard rockfish in the full retention category. At the least, several have mentioned a need for a special publication of Understanding Longline Retention of Rockfish, so they can know what to properly do, ending the confusion made by the Rockfish Program etc.

I am certain you know of the primary focus on trawlers and how longliners got relegated to the insulting description of “entry level.” But at 73, and with over 40 years fishing out of Kodiak, it’s (almost) kind of nice to be considered a kid again.

Or please tell me if we must put forth a formal proposal for staff tasking in December. Know that I speak for others in the longline fleet.

Respectfully yours,



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