#### MEMORANDUM

TO:

Council, AP and SS

FROM:

Jim H. Branson

Executive Director

DATE:

September 19, 1984

SUBJECT: Gulf of Alaska Groundfish Fishery Management Plan

#### ACTION REQUIRED

I. Review preliminary DAP, JVP and OY estimates for 1985 and release to public review.

Provide Council direction on Amendment 12. II.

III. For Information Only: Status of 1984 Sunken Gillnet Fishery off Alaska and Washington.

#### BACKGROUND

#### I. 1985 DAP, JVP and OY

Amendment 11 frameworked the process of determining domestic annual processed catch (DAP) and joint venture processed catch (JVP) in the Gulf of Alaska. It calls for the Council to propose DAPs and JVPs for 1985 at this meeting, the proposals to be published in the Federal Register for comment for 30 days, and the Council to finalize them at the December meeting, after which the Regional Director will implement them administratively.

DAP and JVP for 1985 should be based on the 1984 DAP and JVP harvests; plus any additional amounts necessary for the 1985 domestic fishery. The National Marine Fisheries Service has conducted a survey of the domestic industry to determine the additional DAP needed for 1985. That information and 1984 DAP and JVP harvests to date will be provided during this meeting.

The Gulf of Alaska PMT met on August 27-29 to develop the projected 1985 equilibrium yields for the groundfish species. This Status of Stocks report was sent to you on September 4. Table 1 summarized the team's findings and is provided again here as item  $\underline{D-3(1)}$ . Comparing the projected 1985 EYs with the current EYs and OYs in that table will aid in determining initial 1985 OY estimates for public review. Gary Stauffer, Chairman of the GOA PMT is available to review the Status of Stocks report. A report on the GOA PMT meeting is attached as item D-3(2).

#### II. Amendment 12 - Southeast Alaska Sablefish Pot Ban

In July 1982, the Council passed Amendment 12 for Secretarial review. The amendment, which would have prohibited pot gear for sablefish from a line east of 140°W. longitude to as far south as 55°26'15"N. latitude (Cape Addington), was submitted to the NMFS-Regional Office in early 1983 for preliminary review. Following that review they said that the amendment would probably be disapproved by the Secretary primarily because no demonstrated conservation purposes or real gear conflict problems were addressed and the rationale in general was not strong enough to justify the amendment.

Since then other problems with this amendment have surfaced. The regulatory environment has changed considerably and supporting documentation for an amendment must now be made available to the public and the Council prior to a decision. It wasn't for this amendment and that could lead to disapproval on procedural grounds. The agreement about the quality of pot-caught sablefish is far from resolved, making the arguments for the amendment weak and difficult to document.

These and other problems with the amendment were discussed in my memo to you on June 13, 1984. It appears that Amendment 12 is seriously flawed both procedurally and substantively. The proposed pot ban was perceived to have conservation benefits when it was being considered by the Council and was not dicussed in what is probably the proper perspective, as an allocative measure between gear types. Attached is a letter from Sitka Sound Seafoods expressing a desire to see the local, longline fishermen preferred [Item D-3(3)]. Now that allocation has become an easier issue to discuss, the Council may wish to take another look at the proposed pot ban from that aspect.

I see three alternatives before the Council:

- (1) Rescind approval of Amendment 12 as now written and give the plan team an objective for the amendment so they can analyze the ways of attaining it in time for the groundfish amendment cycle;
- (2) Rescind approval of Amendment 12 and drop the subject entirely; or
- (3) Reaffirm the Council position on Amendment 12 and submit the amendment package for Secretarial review (i.e., maintain status quo).

The third is pointless -- we know it cannot be approved, and number two will not respond to the longline industry, which still wants the ban and will probably urge even more extensive closures.

#### III. Status of 1984 Sunken Gillnet Fisheries

Enclosed for your information are two reports on the use of sunken gillnets for groundfish, particularly sablefish, off Alaska and Washington. The first report, item  $\underline{D-3(4)}$ , focuses on the efforts of two Alaskan longline vessels that experimented with sunken gillnets while fishing for sablefish east of Kodiak. Both vessels encountered problems with fishing this gear type at such extreme depths (200-400f) and tidal fluctuation. Catches of sablefish were much lower than other vessels using traditional longline gear at the same time. Both skippers have indicated that this may be due in part to their lack of knowledge on how to use sunken gillnets effectively and are considering experimenting with the gear again next season.

Item D-3(5) is a summary of the experimental sunken gillnet fishery for groundfish off Washington. There have been few gear-related problems and catch rates for sablefish, rockfish and lingcod have been high. The fishermen off Washington are fishing in shallower water and in areas less affected by tides than their Alaskan counterparts.

Table 1.--1984 stock condition and abundance trends for groundfish in the Gulf of Alaska.

Species	MSY	1984 OY	Previous EY	1985 EY	Stock Condition	Abundance
					Condition	Trend
Pollock	408,000 (average ASP)	416,000	180,000- 344,000	Not avail- able	Good	Projected continued decline
Pacific cod	88,000- 177,000	60,000	95,000- 190,000	No update	Good	No evidence of signi- ficant recruitment in the last two years
Flounders	67,000	33,500	67,000	No update	Good	Assumed stable
Pacific ocean perch	17,200- 30,900	11,475	50,000	7,232- 19,430	Severely depressed	Stable
Other rockfish	7,600- 10,000	7,600	7,600- 10,000	No update	Depressed	Unknown.Concern for localized depletion in SE for some species
Thornyheads	3,750	3,750	3,750	Unknown	Unknown	CPUE stable, 1982 decline possibly in response to increase sablefish CPUE
Sablefish	25,100	6,410 (W.140°) 1,830- 3,070 (E.140°)	10,965- 21,800	10,965- 21,800	Fair	Stable
Atka mackerel	7,800- 26,800	28,700	16,600- 26,800	Less than 12,300	Low	Declining, no apparent recuitment in central area
Squid	5,000	5,000	5,000	Unknown	Appears good	Assumed stable
ther species	Unknown	18,718	Unknown	Unknown	Probably good	OY based on average low harvests. Abun-dance is probably stable.

#### GULF OF ALASKA GROUNDFISH PLAN MAINTENANCE TEAM MEETING REPORT

August 27-29, 1984 Northwest and Alaska Fisheries Center Seattle, Washington

The Gulf of Alaska groundfish Plan Maintenance Team met in Seattle on August 27-29, 1984. The principal topic was to review the condition of the 10 groundfish species managed by the Gulf of Alaska Groundfish FMP. A number of other issues were also considered.

Since the membership of the PMT is being reconsidered, the PMT chairman included the agency personnel in attendance to be team participants for this meeting. This included Ron Berg and Jim Wilson, NMFS-AKR; Steve Hoag, IPHC; Fritz Funk, Barry Bracken and Fred Gaffney, ADF&G; Jeff Fujioka, Joe Terry and Gary Stauffer, NMFS-NWAFC; and Steve Davis and Jeff Povolny, NPFMC.

#### Status of Gulf of Alaska Groundfish Stocks, 1984

A team report entitled "Status of Gulf of Alaska Groundfish Stocks, 1984," was drafted during the meeting. It was sent out for public review on September 4, 1984. The team examined the current information on the status of stocks available from NMFS and ADF&G. The report identifies those species for which we concluded the condition of resource differs from our 1983 assessment. Adjustments of MSY are being recommended for two species, Pacific ocean perch and Atka mackerel. The team did not develop any alternative OY options at this meeting. This report will be updated in November based on the stock assessment documents prepared for INPFC.

#### Foreign Bycatch of Fully Utilized Species

The team reviewed the report "Alternative management strategies for addressing zero-TALFF amounts of bycatch species in the foreign groundfish fisheries off Alaska." The report considers four alternatives. The four alternatives are summarized below.

- A1. (a) DAH = OY RESERVE TALFF (minimum)
  - (b) Foreign fishing prohibited when catch exceeds TALFF
  - (c) Bycatch retained
- A2. (a) Bycatch of foreign fisheries is treated like prohibited species, bycatch would not apply to OY.
  - (b) Foreign fishing prohibited when bycatch exceeds catch limit.
  - (c) Bycatch discarded.
- A3. (a) Bycatch of foreign fisheries is treated like prohibited species, bycatch would not apply to OY.
  - (b) Foreign fishing prohibited when bycatch exceeds catch limit or excess catch would be discarded.
  - (c) Bycatch retained up to limit.
- B. Economic disincentives alternative mechanisms involve compensatory payments by foreign nations per metric ton of bycatch of fully utilized species.

The team identified 9 criteria to objectively evaluate these alternatives. Summary of the team's evaluation is given in Table 1. The majority of the team generally favored Alternative Al as a solution to this problem for 1985, but we thought that A2 would be better alternative for a long-term solution, although Alternative B, economic disincentives, would provide an immediate solution if foreign poundage fees can be set at U.S. ex-vessel price levels. Others felt that more study is necessary to establish the long-term solution.

Providing for a foreign bycatch of a fully utilized species is an allocation problem. If the Council continues to allow foreign fisheries on stocks with large TALFF numbers, then some part of the OY for species fully utlized by the domestic fishery must be assigned to TALFF, thereby reducing OY available to DAH. A similar decision has already been made by the Council for the bycatch of prohibited species in the Bering Sea.

If bycatch is explicitly allocated to foreign fisheries, then management probably has more control options available and more control on the quantity of the bycatch species caught by the foreign fisheries.

#### Management of FCZ Cul-de-sacs of the Southeast Archipelago

The PMT reviewed the discussion paper entitled "Alternative options for management of the domestic groundfish fishery in the inner-coastal federal waters of the Southeast Alaska Archipelago." As written the paper could serve as a draft EA/RIR for a plan amendment if needed. The paper proposed three alternatives for managing a domestic fishery operating in these instrusion areas. These are:

- 1. Exclude the intrusions from the FMP management unit. This requires the determination by the Council that these cul-de-sac areas are not in need of federal conservation and management.
- 2. Establish the intrusions as a separate federal management district by subdividing the Southeast outside district into two sections.
- 3. Maintain the instrusions as part of the Southeast outside district (status quo).

The three alternatives include the most obvious options for management of a domestic fishery occurring in these areas, e.g., the sablefish fishery. The PMT considers Alternative 1 as the best solution. The State of Alaska managed the Southeast Alaska area prior to the FMP. The fisheries in the intrusion areas prior to 1984 were managed by the state as part of the Southeast inside area harvest guidelines. The resource in these areas has not been a part of the Southeast outside OY in the past.

The existing state management regime would continue with the implemention of Alternative 1 with no additional management cost to federal or state governments.

Alternative 2 was less supportable because of the higher administrative costs resulting from the need for federal enforcement and management of the separate instrusion district. Alternative 3 does not resolve the problem.

31E/F

#### Sablefish Topics

(1) Joint venture and foreign bycatch. With the expansion of the domestic fishery for sablefish in the eastern and central Gulf in 1984, targeting on sablefish by joint venture and foreign longline vessels will be eliminated. The DAP for 1984 is less than OY in the Western Gulf. If OY levels were to significantly increase, DAP would be less than OY allowing for a joint venture or foreign fishey. It is likely that joint venture and foreign fisheries for sablefish will be managed as a bycatch of a fully utilized species in the Central and Eastern Gulf. The question of what is an appropriate bycatch rate is still unanswered.

Ron Berg, Fritz Funk, Jim Wilson and Fred Gaffney were assigned the task of preparing a discussion paper on the question of "zero JVP," using sablefish as an example. This should include problem definition, options, and criteria for evaluating the options.

- (2) Status of Amendment 12. The status of Amendment 12, that restricts the use of sablefish pots or traps in Southeast Alaska, was reviewed. The issue addressed by this proposed amendment does not appear to be a matter of conservation of the resource. The concern appears to be that of lost pots preempting the traditional longline fisheries from the fishing grounds in Southeast Alaska. Ghost fishing by lost gear is also a potential problem. The extent of these problems is not well documented.
- (3) Domestic sablefish season. At the present time, the fishing season in the Gulf FCZ begins on January 1. With the expansion of the domestic sablefish fishery in the Gulf, catch quotas will likely be filled earlier each year. The Council may want to delay the season opening date for this fishery to later in the year. This problem should be evaluated in the future.
- (4) Sablefish management areas. Because of the problem of assigning catches of sablefish from the Cape Spencer area to the appropriate management district, the East Yakutat and Southeast districts have been managed as one area. In an effort to rectify this problem, Ron Berg and Barry Bracken were assigned the task of preparing a discussion paper on sablefish management districts. This paper should define the problem, describe possible options, and formulate criteria for evaluating the options. This should be completed in time for the upcoming amendment cycle.

#### Other Topics

The following topics were discussed for information purposes; no action was taken. Jim Wilson presented the preliminary results of his analysis of the Japanese market for sablefish caught by different gear types. The potential rebuilding rates for POP stocks were discussed by Dan Kimura, Dave Sommerton, and Joe Terry based on their analysis of POP fishery and stock dynamics. The team reviewed the Council's new amendment cycle, updated PMT responsibilities and the proposed plan goals.

TABLE 1

CRITERIA FOR EXAMINING ALTERNATIVES FOR FOREIGN BYCATCH OF FULLY UTILIZED SPECIES

			Altern	N. C.		
	Criteria	A1	A2	А3	В	
1.	Immediate/long-term solution	1985 immediate	1986	1986	short-term with poundage fee; long-term	
2	Require FMP amendment	No	Yes	Yes	No - poundage fee Yes - other	
3a.	Effective against underlogging	low	high	low	low - depends on retention	
3b.	Effective against targeting on prohibited bycatch species	low	high	low	low - depends on retention	
4.	Require modification of DAH	Yes	No	No	many options	
5.	Provide incentive to reduce bycatch	medium	high	medium	Yes, if set at optimal level	
6.	Availability of information for setting bycatch limits	requires work	requires work	requires work	not needed	
7.	Cost to foreign fishery	?	?	?	provides cost information	
8.	Legal problems	?	?	?	?	

P.O. 830 Sitka, Alaska 99835

RECEIVED SEP 1 4 1984
AGENDA D-3(3)
SEPTEMBER 1984

Phone: 907-747-6662



September 8, 1984

Mr. James Branson , Executive Director North Pacific Management Council 605 4th Avenue, West Anchorage, Alaska 99510

Re: Sablefish

Dear Jim:

On November 29, 1984 I wrote you a letter in which I discussed the ability of the United States processors to market larger amounts of sablefish available if the foreign fleets were cut back or eliminated from our areas of management. We had an increase last year in landings from the West Yakutat area, and found the product to be as good as we receive from our Eastern area. This year we have seen a large increase in sable fishing vessels, and has resulted in landings of this plant of 2.5 million pounds, with two-thirds of it being "Eastern Cut" and the balance the traditional "Western Cut." I know that the other local plant, Seafood Producers, has also increased production and Pelican is having one of the best ever years for this specie.

We have had no problem whatsoever in moving the prouduct and all of the E/C is going into Japan on a very orderly basis. The domestic users seem to prefer the W/C, but I believe this will be for only a short time, as they began to appreciate the E/C superior quality due to shorter fishing time. The price to the fishermen and to the processors has risen modestly and is at what I consider a respectable level, providing they can continue to deal in the volumes produced this year.

As stated in my letter, a copy of which is enclosed, I strongly feel that the Eastern area and preferably the other areas, be restricted to long-lining only. From my personal experience and from the remarks of other knowledgeable users of sablefish, the indication is that long-line is produces the most favorable product.

A real solid reason for not having pot fishing in any sable area is to preserve the grounds. We have seen experiences of lost pots being left out, probably continuing to fish for a period and making it difficult for long-liners to retrieve their gear if set over the abandoned pots. I urge your body to consider not recinding Amendment 12, which I understand you have proposed. I do realize that you are entering into a gear-type area, but I think it is just common sense to do what is best for the industry as a whole.

We have experienced in the past four years a change from a black cod fishery that was incidental at best in most cases, when the boats could not fish halibut or seine for salmon to a very important part of Alaskan processors total business. Let's not let happen to sablefish as it has to halibut and some of the other species that suffered because of inappropriate action.

Mr. James Branson NPMC September 8, 1984 Page Two

Another item to consider, whether your Council the authority to set it or not, is delay of opening in the Eastern area until at least the 1st of March of each year. We are mainly directed at preserving the fishery off of Sitka to the smaller long-line vessels, who have actually pioneered this fishery and are entitled to continue to benefit from the local fishery. You are likely aware that we may be entering into an era of very large frozen at sea vessels that could wash our our resource in a very short time. Obviously they would start in this area and continue westward until the quota were all taken. may be the modern way, as experienced in Canada, but not is what is the best for the majority. My reasoning for a later opening in this area is because having to maintain this plant for production at a time of the year when weather seriously hampers fishing. True, we do get an occasional good trip, but it is not the rule. By delaying the opening, we would give our smaller vessels a fair chance to fish during better weather, and it would also tend to spread out the fleet to all areas, now that most freezing plants are participating in handling this product.

My son, Harold, will be attending the meetings in Anchorage this month, and he will further state our reasons for support of longlining only in this and possibly all areas, and also to present reasoning for a delayed opening in the Eastern area.

I will be in Anchorage about the 19th of this month, and surely would appreciate stopping by and having a discussion with you.

The year has been good for us, Jim, with about 12,000,000# through to date. It seems that we may have broken the barrier that prevented the fish industry from making a margin and hopefully this trend will continue.

Very truly, yours,

T. E. Thompson

President

## Use of sunken gillnets for sablefish in the 1984 Central Gulf of Alaska sablefish fishery.

The use of sunken gillnets for taking bottomfish is prohibited throughout Alaska with the exception of three management areas. Use of this gear type for bottomfish is allowed on a permit-only basis in the Kodiak, Aleutian Islands and Cook Inlet areas. Sunken gillnets were used on a very limited basis prior to 1984 and targeted entirely at Pacific cod and rockfish. Its use during this time met with marginal success. The sparse and sporatic logbook data obtained from this earlier fishing suggests that many of the permits issued were not utilized.

The first use of sunken gillnets for sablefish was in 1984. Skippers of two primarily longline vessels requested permits through the Alaska Department of Fish and Came (ADF&G) office in Kodiak in April, stating they intended to utilize sunken gillnets and target on sablefish in the Kodiak area. These skippers were sent sample copies of the Westward Region sunken gillnet permits which outlined the stipulation under which such fishing is permitted, and told that they would be issued permits pending their personally contacting Kodiak area bottomfish management personnel as per permit requirments. In addition to personally contacting management personnel prior to fishing, permitees are required to maintain fishing logs, take out Department observers upon advance request, and rig gear so it can break away from the bottom if the anchors become fouled.

The first of these two vessels arrived in Kodiak during the latter part of May, was issued a permit, and made three landings by the middle of July. A total of 32 sets were made during these three trips for a total catch of 39,192 lbs. round weight, with a mean catch per landing of 13,054 lbs.(5.9 mt). This mean catch is 29% of the 20.5 mt mean catch per landing for the 56 sablefish landings made from essentially the same areas during June and July. The general areas fished by this vessel are depicted in Figure 1. Fishing by this first gillnet vessel occurred between 50 and 105 nautical miles east of Kodiak Island at depths ranging from 250 to 350 fathoms. The second vessel reportedly fished essentially the same areas as the first, but with less success. While detailed catch records are unfortunately not available for the second vessel, a skipper interview following an early June landing in Seward shows a catch of approximately 1.5 mt, significantly below the mean landing of 5.9 mt for the first gillnet vessel and the 20.5 mt mean for the fleet in this area as a whole. Although the skippers of both vessels had agreed to take out Department observers after some initial experience with this gear type, the poor catch rates and gear problems they experienced forced them to cease their gillnet operations before observers could be put aboard.

Discussions with the skippers and crews of the two vessels involved regarding the problems with the sunken gillnet operations suggest two primary factors to be responsible - lack of prior experience in using this gear type, and the inadequacy of nets and deck gear to fish for the existing depths and tidal conditions. A major problem in this regard was the inadequate retreival ability of the net pullers. This problem was

further compounded by the nets themselves not being able to withstand the stresses of fishing the strong tides and fishing depths which range from 250 to 350 fathoms. Consequently, both vessels suffered considerable gear damage. A secondary problem according to one of the skippers involved is their lack of experience fishing this gear for sablefish. He felt that many of this years problems could be solved with more experience fishing the gear, heavier nets and improved pullers.

Incidental catch proved to be little problem for either vessel, with the vast majority being rockfish (probably yelloweye) and arrowtooth flounder. The incidence of rockfish seemed to lessen with depth. No salmon catch was reported by either vessel, and the halibut catch was reportedly three to four per trip. The few halibut caught were reportedly released alive with little or no damage.

The gillnets used by both vessels were essentially identical, consisting of 50 fathom shackles 12 ft. deep. The majority (80%) of this gear had 6" web, although some  $6\frac{1}{4}$ " and  $6\frac{1}{2}$ " web was used. Both multi- and monofilament webbing were used, with the multifilament considered superior due to it greater strength and flexability. The 6" webbing definitely produced the highest catch rates of the three sizes available, and one vessel skipper stated that the fish caught with it were definitely larger than those in the longline fishery. He plans in the future to use smaller mesh to hopefully increase his catch rate and bring the size composition into line with that of the longline fishery.

General conclusions on the sunken gillnet fishery for sablefish to date seem to be that 1984 was a learning experience and at least one of these vessels plans to persue its use next year. The two improvements needed for this gear type to be successful for sablefish are apparently stronger headropes and footropes on gear, smaller mesh, improved gear haulers, and more experience in the fishery. The major advantage of this gear type over longline gear for sablefish is that it is apparently less labor intensive and requires less repair on the fishing grounds, thereby increasing the time actually spent fishing with correspondingly increased total catches. It is anticipated that increasing use of this gear type as well as pots will be seen for sablefish in 1985.

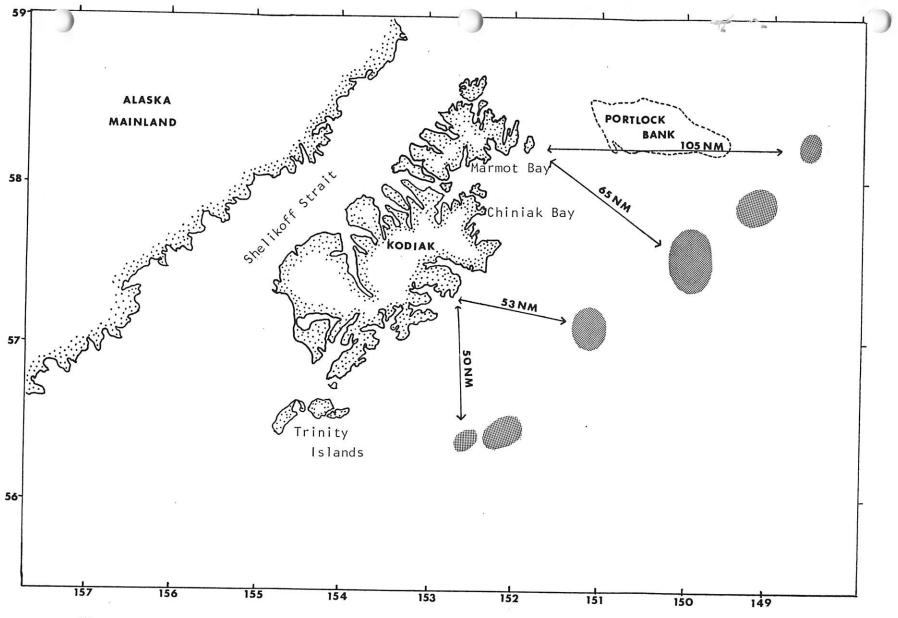


Figure 1 - Delineation of areas fished for Sablefish by permitted vessel using sunken gillnets, June and July,1984.

#### Summary Report on the Use of Sunken Gillnets in the Sablefish Fishery off Washington

For the last three years, an experimental sunken gillnet fishery for sablefish has been conducted off the coast of Washington state. A report on the 1983 fishery was distributed in January 1984 by the Northwest and Alaska Fisheries Center. The report describes the primary purposes of the experimental fishery as an attempt to determine whether submerged gillnets are a suitable gear type for harvesting groundfish, and secondly, to determine the impact of such gear on other resources as well as other resource users. Data for the study is obtained from two NMFS observers. Results from 1983 showed that the set nets are effective in harvesting sablefish, lingcod and rockfish, and that first-time users could conduct a profitable operation with such gear. Additional observations and results were included in the report which is available at the Council office.

In 1984, a similar experimental fishery was designed and is currently underway. A formal report similar to the one described above will be available sometime this winter. The following is a summary of the progress of this fishery as of mid-September.

The Washington sablefish season runs from January 1 through December 31 and has an OY set at 17,400 mt. Fishermen don't begin to fish for sablefish until usually May when the sablefish migrate into shallow water along the edge of the continental slope (approximately 100 f). There are three legal gear types used in this fishery in addition to the experimental gillnets. They are trawl, longline and pots. Most gear is fished in the 90-200 f range. As of September 12, approximately 11,000 mt have been harvested. The most popular area for fishing has been around Nitinat Canyon, where there has been no gear loss even though all four gear types are used. There have been some reports of temporary gillnet loss by one of the three vessels authorized to fish with the gear, but the skipper has been able to retrieve his nets using a grappling hook every time. There have only been few incidences of entanglement of gillnets with other gear.

No specific details are currently available on actual fishing rates of sunken gillnets on sablefish. However, one gillnet fishermen has been routinely making 20,000 lb. deliveries (i.e., loading up) after only two days of fishing. This compares to the same size delivery being made in seven days when this fisherman has used longline gear.

With the obviously high catch rates and lack of gear loss and entanglement problems, there is a growing interest by fishermen to have sunken gillnets legalized off Washington.

ROUTE TO

Esec. Da.

### AMERICAN IMPORT / EXPORT CORPORATION

RECEIVED SEP 1 1 1984

MAIL: BOX 181 2464 - 33RD AVE. WEST, SEATTLE, WASHINGTON 98199 OFFICE: 2820 THORNDYKE AVE. WEST, SEATTLE, WASHINGTON 98199 (206) 282-4777 OR TELEX: 294878 FMSC-UR

September 7, 1984

ACTION

North Pacific Fisheries Management Council PO Box 103136 Anchorage, Alaska 99510

Chairman: Mr. James O. Campbell Executive Director: Mr. Jim Branson

To All Concerned:

This letter is to inform the NORTH PACIFIC FISHERIES MANAGEMENT COUNCIL, of our intentions as AMERICAN IMPORT/EXPORT CORPORATION for the upcoming 1985 Alaska, pacific black cod fishery.

We fully expect to harvest and process (utilizing pots) a substantial amount of pacific black cod with a total American effort. Our total production/processing effort will be accomplished with no foreign participation and we see no need at all for allowing foreign participation, at any level, in the 1985 black cod fishery.

This feeling is well thought out and backed by all U.S. participants in the various black cod fisheries.

Further, it would be against our best interests to advocate any type of gear restrictions as they would apply to "pot" fishing, in any geographical area of Alaska. Restricting certain areas to longlining only, can only at best be unfair and detrimental to the black cod fishery.

If you have any questions, please feel free to call us at your convenience. Thank you.

Sincerely,

Patrick Johnston

AMERICAN IMPORT EXPORT CORPORATION

PGJ/tj

TEL. (206) 283-1669 TELEFAX (206) 283-1696



## SHINKO SANGYO TRADING CO., LTD.

### SEATTLE LIAISON OFFICE

192 Nickerson St., Suite 300 Seattle, WA 98109

Our Ref. No.

Date Sept. 6,1984

North Pacific Fisheries Management Concil Anchorage, AK

Re: S.E.Alaska Sablefish

Dear Sirs.

As a buyer of U.S. sablefish, we are very much concerned over the attempt of the S.E. Alaska fishermen to keep their fishery limited to the longline method of catching, and strongly endorse such a move by the NPFMC.

Over the past two to three years we have experienced a great improvement in quality of the Alaskan sablefish and in general the Japanese market has also experienced this same improvement, especially as compared to the sablefish from Washington, Oregon and California areas where pot and trawl methods are used.

It seems to us that with Alaska trying to promote their fishing products with such organizations as Alaska Marketing Clustitue, the logical method of fishing should be limited to longlining to insure the continuation of your good reputation.

Very truly yours,

Shinko Sangyo Trading Co., Ltd.

てるみんらんへ H. Yoshida

Representative in Seattle

OSAKA: 38, 2-chome Kitakyutaro-machi, Higashi-ku, Osaka JAPAN Teles J63243)

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#### SAPPORO CHUO SUISAN CO., LTD. KITA 13-JO NISHI 20-CHOME NO. 37 CHUO-KU, SAPPORO JAPAN

TELEX:
932965
SAP

Mr. Jim Branson Executive Director NPFMC Box 3136DT Anchorage, AK 99510 U.S.A.

# A Certain Suggestion on Quality of Frozen Black Cod ex Alaska, U.S.A.

Dear Mr. Branson;

Recently Japanese companies have been importing a large quantity of frozen black cod from Alaska, U.S.A. Ana we, our company, are also supplying a lot of them to consumers in our market. But, regret to say, we notice big difference in their quality which we believe is the result from the way of catching them. Black cod that are caught with long-lines are landed, processed and frozen in a short time, so they maintain freshness, and thus are popular among consumers, while those caught with pots are easy to have scratches and scars, because a lot of fish caught in one pot at a time and besides they often lose freshness as they are left in the sea for a certain period of time. Such being the case, poor quality products from pot-caught fish are often mixed among frozen products. As the result, we are often claimed by consumers for such poor quality frozen black cod processed from those pot-caught fish, and we find it very difficult to properly treat such claims.

Therefore please allow us to suggest that the way of catching black cod in Alaska should be limited only to the long-lines, and no pots should be allowed.

Very truly yours

Shunzo Ishida

Manager

Sales Department

Sapporo Chuo Suisan Co., Ltd.

### HANWA AMERICAN CORP.

SEATTLE BRANCH

HEAD OFFICE: 485 LEXINGTON AVE., N.Y. PHONE (212) 867-3160 SUITE 1640, BANK OF CALIFORNIA CENTER SEATTLE. WASHINGTON 98164

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ETTER	NO
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ATTLF:	September	12,	1984
ATTLE:	ocp cember	14,	1304

North Pacific Fisheries Management Council Anchorage, AK

Re: S.E. Alaska Black Cod

Dear Sirs:

There is going to be a presentation made to you at your September meeting proposing that S. E. Alaska be established as an area for only longline fishing of black cod.

We sell fish to customers who need a high quality product. Pot-caught fish from the Northwest are worthless, but our market for the longline-caught fish is growing. The prices on these fish are higher, and the demand will keep them up. This provides a good return for the fishermen. Without a reliable supply of these high quality fish, this market will be destroyed. In order to provide a reliable supply, the North Pacific Fisheries Management Council should designate S.E. Alaska as a longline fishing only area for black cod. The benefits from this action will be many.

Sincerely,

HANWA AMERICAN CORP., SEATTLE

K. Shintaku, General Manager

read of a service of a

ANYO FISHERIES CO., LTD.

(ANYO SUISAN KABUSHIKI KAISHA)

TELEPHONE TOKYO (664) \$ 0 8 1

Bumitomo Bank asakusabashi Building, 244, Nihonbashi Bakuro-Cho, Chuo-Ku, Tokyo, Japan CABLE ADDRESS INTLFISHED YOKYO TELEX NUMBER (202) 2838 INFISH J A. A. B. INTLFISHED TOK

North Pacific Fisheries Management Council Anchorage, AK

Re: S.E. Alaska sablefish

Dear Sirs:

We have recently discovered that is an on-going attempt to make the S.E. Alaska sablefish fisherey into an exclusive longline fishery. We highly recommend this policy.

We have purchased Oregon pot-caught sablefish in the past because of the attractive prices, usually \$.15/1b less than Alaska. However, we were not able to use this product due to the inferior quality.

Alaska sablefish is a high quality product. We do not want to see these standards lowered for any reason.

We hope that when the time has come to make a decision in this matter, that you will consider these points. Thank you.

Sincerly yours,

K./Tsuda

Jim H. Branson, Executive Director North Pacific Fidhery Management council

Mr. Branson,

I am writing to express my deep concern over an issue before the council at this meeting.

I have fished halibut and/or black cod for 10 years and have relied on either or both for my sole income for all of those years. I am a longliner.

My first concern is the possible emergence of a black cod pot fishery in Southeast and the Gulf of Alaska.

During the previous five years I have seen various pot fisherman try and make a living with black cod off Southeast Alaska. With gear far heavier than longline gear and their style and method of running their gear being different, it was impossible to fish around them. Knowing they had the advantage over longliners with their heavier pot gear, they would often push the advantage and would distribute their gear so that longliners fishing adjacent would have to move completely out of the area. Figuring their gear was more valuable, the pot fishermen weren't the least concerned with the resulting loss of longline gear. It is an established fact that pot and longline gear types are incompatible.

It is also a "given" that longline caught black cod is far superior in quality, since each fish is individually handled and cared for; the long-line caught fish don't have the net-marks associated with pot-caught fish; and longline-caught fish don't suffer the effects of being smashed with many other fish into a pot and sitting on the bottom without food for an indefinite amount of time.

Longliners have now established a high quality market in Japan and stateside, and Alaska longliners in particular have developed a good reputation for product quality. The effect of a pot fishery being developed would be to release inferior quality fish competing for the same markets, and could bring the price down for everyone. It happened before in 1980.

There exists, at present, a longline fleet of sufficient size to fully utilize the entire quotas for Southeast and the Gulf of Alaska. The long-line fleet itself is expanding at an aliming rate already, with the removal of the Japanese longline fleet from the central gulf; and the attractive prices this year; and the insecurity in short halibut seasons.

I strongly recommend that the black cod fishery in Southeast and the Gulf of Alaska be maintained solely as a longline fishery, as with halibut.

Also, considering the dangerous rate of expansion of the longline fleet itself, I recommend the Council consider alternatives for a limited entry program for the black cod fishery and start work on a timetable for implementation of the program. I have seen halibut fishing go from a viable, sustaining fishery to one in which a person can no longer make a living. Black cod is the last significant, viable fishery longliners have. I have no desire to see it go the way of the halibut fishery.

Thank you for your consideration.

Sincerely,

Steven T. Fish, F/V Swift II

Sten T. RAZ

P.O. box 892

Petersburg, Ak. 99833

RECEIVED SEP 2 7 1984

AGENDA D-3e
SEPTEMBER 1984
SUPPLEMENTAL

September 21, 1984

Mr. Jim Branson - Executive Director
North Pacific Fisheries Management Council
P. O. Box 103136
Anchorage, AK 99510

Dear Jim,

Property and with the me wood like

After talking to Gary Starffer and Jeff Povolny today, I became aware of the Management Council meeting being held in Anchorage starting September 24th. Unfortunately, I will not be able to attend. I had wanted to provide some information regarding my experience this summer in the sunken gillnet sablefishery.

Fishing the Central Gulf District, I observed:

- 1. I had no conflicts with other types of gear, and do not forsee a problem given the depth and vastness of the area.
- 2. The catch of incidental species was negligible. 97% of the catch was the target species.
- 3. Due to the mesh size, I caught a greater percentage of higher market-value fish than other gear types. My ex-vessel price was 12 to 15 cents higher because of the high percentage of large fish.

I think it is important to provide this input at the meetings to encourage the development of this promising gear type. Also, I am aware of the longliner's political resistance, and want to voice support for the sunken gillnetting of bottom fish.

Thank you for relaying my thoughts on this matter.

Sincerely,

Loren Kapp

Owner /operator

F/V KAPTURE

P.O. Box 2918

Homer, AK 99603

walker the factor of the second

Greg Cushing Box 164 Sitka, Alaska 99835

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

Chairman Campbell

I am a longline fisherman in Sitka. I have fished for halbut, black cod and rockfish for 13 years in Southeast Alaska. Having been born and raised in Sitka, I've seen many changes in our fisheries over the years. There are many issues that I could address in this testimony today but I'll limit myself to the most important. That is Amendment 12. This amendment was presented to and passed by the Council in Sitka. Being somewhat involved in the preparation of this amendment, and having also testified myself, I was pleased to hear Mr. Branson's comments to Mr. Baker and Mr. Bell who gave the presentation. These comments came during the meeting(on the record) and following the meeting. Very favorable comments such as: "You people really did your homework, Everyone was quite impressed, One of the best presentations yet by any fisherman's group" among others. This together with the Council's passing vote on the amendment, was a very positive note for our group and for the fisheries in Southeast.

I was therefore dismayed at Mr. Branson's letter of June 13, 84' to council members recommending deleting the amendment. It was very inconsistent with his previous reaction and did not represent accurately the testimony given by myself and others.

Testimony was given concerning gear conflicts, both while fishing and with lost pot gear. Very productive black cod areas are virtually untouchable with our hook and line long-line gear now because of lost pot gear. Some of it, the very gear we testified about at the prior meeting. It's stillthere. Our gear cannot compete strengthwise with the large pot bouy lines, when we get tangled up with it. When a pot boat sets our gear down, we don't get our gear back. I have personally lost \$1,100.00 worth of gear to just that one spot. Not to mention fish lost, downtime etc.... It is a problem and would become a monumental one should pot fishing be allowed.

The past incidence of traditionally small fish harvested by pots is a concern that should be considered very seriously also.

On top of all the negative factors involved in a black cod pot fishery is the fact that we harvested our quota in S.E. Alaska this year, 1984, by the middle of the summer. We are harvesting the quota with longline hook and line gear. Our fishermen are moving westward more and more each year and we are still closing S.E. down earlier every year. There simply is no more room for increased effort especially of the obvious magnitude we can expect from a large boat pot fleet.

So far I have just related to the pot-longline problem. The other part of the issue is the emergence of an offshore trawl fishery off S.E. It is obvious what would happen to our fisheries in S.E. if any trawling was allowed. Our narrow strip of fishable ground simply cannot support it. We are currently harvesting our halibut in three days, our blackcod in a few months, and undoubtedly we face regulation of rockfish in the near future. I very strongly urge this council to adopt this amendment as I believe to do otherwise would be simply the end of the longline fisheries of S.E. Alaska and a serious detriment to other established fisheries as well.

Thank You

Greg Cushing

sirs .

Sept 24, 1984

while longlining for blackcool This past June and July off The southcast end of The Portlock Banks we started catching freshly net-marked blackcool. They seemed to be The smaller fish, under 5 lbs headed and gutted. The net manks generally would be across. The front of The head and just ahead of The pelvic fins. In many cases The skin in front of The pelvic fins was worn raw. A few fish had manks behind The gill covers and on The gills Themselves. In almost all cases we were able to sell Them as #1's because of The Eastern cut. If The fish had been cleaned western cut many would have been #2's.

The net marked tish made up between 5% and 10% of our catch on one trip and 2% to 3% on The next trip. By Then The two boats blackcodding with bottom gill nets had stopped using The nets.

Lonnic R. Chesnut FV Radar P.O. Box 2374 Sitka, Ak, 99835 September 21, 1984

Jim H. Branson North Pacific Fisheries Management Council P. O. Box 103136 Anchorage, Alaska 99510

Mr. Branson:

I would like to comment on the proposed use of sunken gillnets to capture blackcod within the Alaskan waters under the jurisdiction of the NPFMC.

I do have considerable experience with the use of sunken gillnets, having used same for catching hanging-bait during the last two crab seasons (1981-82, 1982-83) prior to their being ruled illegal by the State of Alaska. This experience, and the records which I kept while using the nets, causes me to speak out very firmly against their use as a gear for the commercial harvest of blackcod.

My biggest single worry related to sunken gillnets is the extremely high incidence of non-targeted catch. Our 50 fathom shackles of net proved to be devastating on incidental King salmon, halibut, seabirds (ie., cormorants, scoters and guillemot), and marine mammals (ie., sea lions and Dall porpoise). And while I realise that the depths we were fishing for bait were considerably shallower than the areas one would fish for commercial quantities of blackcod, I feel that incidental catch at increased depths is still a viable concern.

Retrieving sunken gillnets out of depths greater than 50-70 fathoms, no matter how strong the accessory lines may be, poses quite a logistical problem. When one considers the depths of lower Chatham Straits (150-300 plus fathoms), I know that there will be a lot of lost gear left on the bottom. As anyone with a background in sunken gillnets know, this gear will prove to be an obstruction and deathtrap to all but the most powerful creatures that come in contact with it once it is lost.

From conversations with longline blackcod fishermen here in Southeast Alaska, it seems eveident that another form of gear being introduced on the blackcod grounds would prove to be counterproductive in more ways than immediately meet the eye. In the first place, gear conflicts and tangles between sunken nets and hook and line operations (and the resultant loss of either type) would create unnecessary animosity in an already highly-competitive fishery. In the second place, we have a very quality-concious attitude among the present blackcod producers and their processors - and the very nature of gillnets tends to preclude high quality fish from entering the marketplace. The fine texture of blackcod flesh would not hold up very well in a gillnet operation where the fish are netted and yarded out of extreme depths. The sunken gillnet is an abberation which has no place in the fabric of the quality, contemporary blackcod marketplace.

Thank you for your time and consideration of this matter.

Sincerely,
Joe Donohue
F/V STORM FRONT - JUNEAU

9/8/84 ROM HEGGE EXECUTIVE DIRECTOR ALASKA CONGCINERS ASSOC. SITKA, AK RON: I'm deeply troubled by the prospects of competing with pot gear on the blacked grounds in ALASKA.

As you know, I fished longline gear off the Washington COAST for five years. During that time it was my that fishery. It became impossible for me to ful profitably Against pot gear for two reasons: 1. Once the pots were on productive ground they were never moved; 2. The guality of the overall blackoop MARKETED IM WAShington dropped And the price reflected it. At first, the pot year was fished in degrer water. The longtone gear. The skippers of the pot boars, with whom I gake many times, were sware of the bigger size AND greater quantities of up that the longimers were delivering. It happened suddenly. One tryp there were no pots in our longime holes, the next try every traditional longime hole had pots in them. I discovered the change the happ way. Pot basts don't use flag poles, so their goor was not obvious amore I lited set my gear. Of course I couldn't get it back smee Jots AR so heavy. One bout that well, had sixteen strings of between five and seven Those pots were never moved during the tunes that I fished. They were hould some reset during trys to deliver and of course they were left out during the boats downtime for metanical problems me during

Reprody restrict that fishery in Millet. It seems their teambers. Hus now, the quales for blockus see Love liners desciunte stocks in this to los to munding de Wiring to six mother stups. I'm seen the JAPINEST Mound our sperstrang to 32 Artster.

The Letter grown I have tilled I stocked by the destinations of the best of t the grounds ame short trys. It become so costly we make our spending to 32 Altath. Nearly with when when he boats were titues. Other

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Ron Hegge - 3 even be considered in a fishing that control keep The longliners fishing.

It is now the north of Leptember. I look snowns The handor in Sites AND All I See Are longlare busts with nowhere to go. I energy ALFA to do whatever it can to ensure A future for long (mens. The fleet has invested heavily for the future and has believed that the governing bodies will allow us to fish to our potential and protect us from foreign interests. I hope that faith is not in warm. Sincerely yours, F/V SemIDI PJ. Other boars that were involved directly in gear conflicts with pot LOATS ARE: Levia Hum Bonny Jerry Sea VALLEY Sea VALLEY II IROM MAN CATRINA

TOTAL

	SPECIES	AREA	ОУ	RESERVE	DAP	JVP	DAH	TALFF
	POLLOCK	W/C	400000	80000	2023	185100	187123	132877
		E	16600	3320	5	0	5	13275
	TOTAL		416600	83320	2028	185100	187128	146152
i	P. COD	W	16560	3312	600	5965	6565	6683
	·	С	33540	6708	8691	8200	16891	9941
		E	9900	1980	120	0	120	7800
	TOTAL		60000	12000	9411	14165	23576	24424
	FLOUNDERS	<b>W</b>	10400	2080	400	800	1200	7120
		С	14700	2940	1486	1800	3286	8474
		E	8400	1680	227	0	227	6493
	TOTAL		33500	6700	2113	2600	4713	22087
	POP	W	2700	540	3000	6951	9951	-7791
		С	7900	1580	6683	500	7183	-863
		E	875	175	136	0	136	564
l	TOTAL		11475	2295	9819	7451	17270	-8090
	SABLEFISH	W	1670	334	1752	114	1866	-530
		C	3060	612	6035	290	6325	-3877
l		W.YAK	1680	336	0	0	0	1344
		E.YAK	1135	0	0	0	. 0	1135
İ		S.E.OUT	. 1435	0	3016	0	3016	0
	TOTAL		8980	1282	10803	404	11207	-3509
	ATKA MACK	W	4678	936	. 0	3400	3400	342
		C	20836	4167	0	500	500	16169
1		E	3186	637	0	0	0	2549
	TOTAL		28700	5740	0	3900	3900	19060
	ROCKFISH	GW	7600	1520 %.	2947	1765	4712	1368
	THORNYHEA	GW	3750	750	0	0	0	3000
	squip	GW	5000	1000	0	0	. 0	4000
·	OTHER SPE	GW	28780	5756	6 2	605	667	22357

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Table 3.--Gulf of Alaska groundfish OY, DAH, TALFF and catch statistics for 1984 reported and compiled by September 8.

Pollock  Pacific Cod	ARI W C E Total	400,000 <sup>1</sup> /	DAH	LANDINGS	JV CATCH	INITIAL TALFF	ALLOCATION	FOREIGN	TOTAL
	C E	• -				TALFF	TO DATE	CATCH	CATCH
Pacific Cod	E	• -		0			· · · · · · · · · · · · · · · · · · ·		
Pacific Cod		16,600	215,500 <sup>1</sup> /	329	179,655 <sup>1</sup> /	105,0001/	113,665 <sup>1</sup> /	20 24017	242 2221
Pacific Cod	Total		300	0	0	12,980	113,003_7	38,219 <sup>1</sup> /	218,203 <sup>1</sup>
Pacific Cod		L 416,600	215,800	329	179,655	117,980	113,680	38,219	218,203
	W	16,560	750	16	141	12,498	12 200	10.611	
	С	33,540	26,300	2,049	3,032	3,532	12,398	12,641	12,798
	E	9,900	120	20	0	7,800	6,395	2,748	7,829
	Total	60,000	27,170	2,085	3,173	23,830	4,937 23,730	0 15,389	20 20,647
Atka macker	el W	4,678	800	0	351	2,942	2 420		
	C	20,836	1,500	0	7	15,169	2,429	196	547
	E	3,186	0	Ö	ó	2,549	18,178	56	63
	Total		2,300	0	358	20,660	53	0	0
		-		J	330	20,000	20,660	252	610
Flounder	W	10,400	10	0	138	8,310	7,841	239	377
	С	14,700	8,720	240	1,693	3,040	2,317	1,411	3,344
	E	8,400	300	91	0	6,420	635	0	3,344 91
	Total	33,500	9,030	331	1,831	17,770	10,793	1,650	3,812
Pacific Ocea	ın W	2,700	1,770	26	1,225	390	292	154	1 405
Perch	С	7,900	2,620	0	270	3,700	3,302	2,211	1,405
	E	875	460	3	0	240	17	0	2,481
	Total	11,475	4,850	29	1,495	4,330	3,611	2,365	3 3,889
C-1-61-1							• • • • •		2,003
Sablefish	W	1,670	300	156	121	1,036	1,036	322	599
	C	3,060	1,650	2870	129	798	662	73	3,072
	E	$4,750^2/$	4,414	5,008	0	40	15	0	5,008
	Total	9,480 <sup>2</sup> /	6,364	8,034	250	1,874	1,713	395	8,679
Squid	Total	5,000	110	0	4	3,890	3,890	36	40
Rockfish	Total	7,600	895	515	265	5,185	3,374	340	1,120
Thornyhead									_
Rockfish	Total	3,750	200	10	9	2,800	2,800	104	123
ther									
Species	Total	18,718	500	tr	1,134	14,474	14,474	350	1,484
otal	W	36,008	3,630	198	1,976	25,176	23,996	13,552	15 776
	C	480,036	256,290	<i>5</i> ,488	184,786	131,239			15,726 234,992
	E	43,711	5,594	5,122	0	30,029	144,519		
	Total	594,823	267,219	11,333	188,174	212,793	5,672 198,725	0 59,100	5,122

<sup>1/</sup>Pollock values of Western and Central areas combined.
2/OY value is high number of range, and includes 500 t assigned to inside waters of Southeast.
3/Reported landings as of September 21.

- Ly chulton pound -

Proposed Motions - Hgenden D-3(a)
Incidental Catch (Ceilings for the Donestic
Trawl Fishery

MoTion: (1) I move that the Mational Plavine Fineries
Service 1950 and Eavergancy Regulation fishery
to set the Ga/t of Hoska ground this Lishery
restrictions at 270 mt and 768mt mthe
Mastery and Central Out of Hasha
maspectively) and to exempt donestic Mio-woter
frametrs from the halibut bycatch regulation.
The surveyancy regulation shall apply for the
serviced December 1,1884 to May 31, 1995.

(2) I nove that the halibut bratch linits
be apportioned the IVP and IHF fisheries,
in proportion to their respective
harvests auticipated plus reserves anticipated
during the time period.

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Service of the Salary by Depart Motorial - Francis In 3(6) The sale of the sa morning of the first the first the first the second The continue of the form A THE RESERVE TO THE Wastern was Catric Cut of Thanks the state of the s month days I de fort that he was to be a great The extension to be to be a fair of the first from granged building rock to the plant of the (2) I now that the light history has Atheren our later to the state of the state The state of the s

page 2 Motions for I tem D-3 (a)

- (3) I move that specific halibut

  by Catch a mounts be attached, by condition, to

  leach federal joint venture permit. The

  halibut bycatch amounts should be in proportion to the amount

  of ground fish the operation expects to

  harvest during the time period.
  - (4) I Move that the Council request the State of Flaska to condition their internal water's joint venture permits in the same manner as federal joint venture permits for controlling halibat bycatch.
  - (5) I move that for purposes of Monitoring
    the halibat bycatch during the period December 1, 1884
    to May 31 1885, that the National Marine
    Fisheries Service use halibat bycatch information
    from the Alasta Department of Fish and Game as
    well as information from the NAFS observer
    Program.

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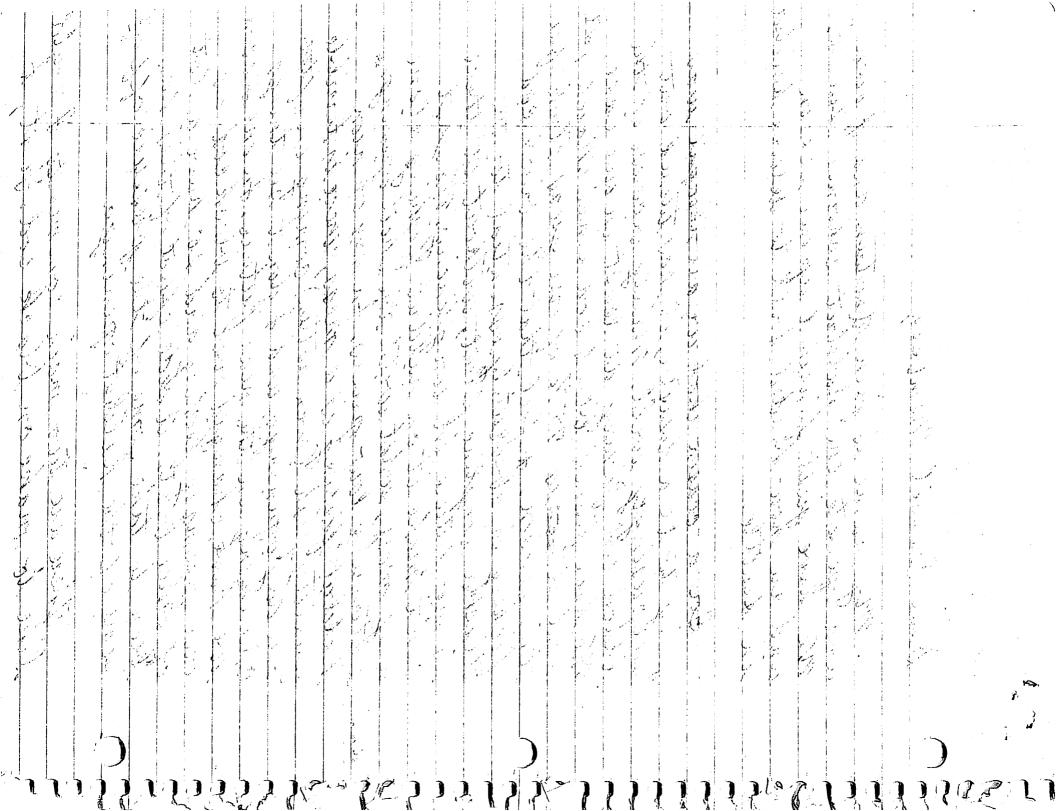
well as into a judge has a transfer a present of Harry M. Was I have the Marine (1) I hove that the person had been as properties der contrating that some sychologie TOWN THE PROPERTY OF THE PARTY the entry magnification of many the many the many The second of th help you consume should be to properly the year. The second of th AND THE WAR THE PERSON OF THE PARTY OF THE P Capital And Andrew Hart Modification D-3 (49)

Dear Council Members,

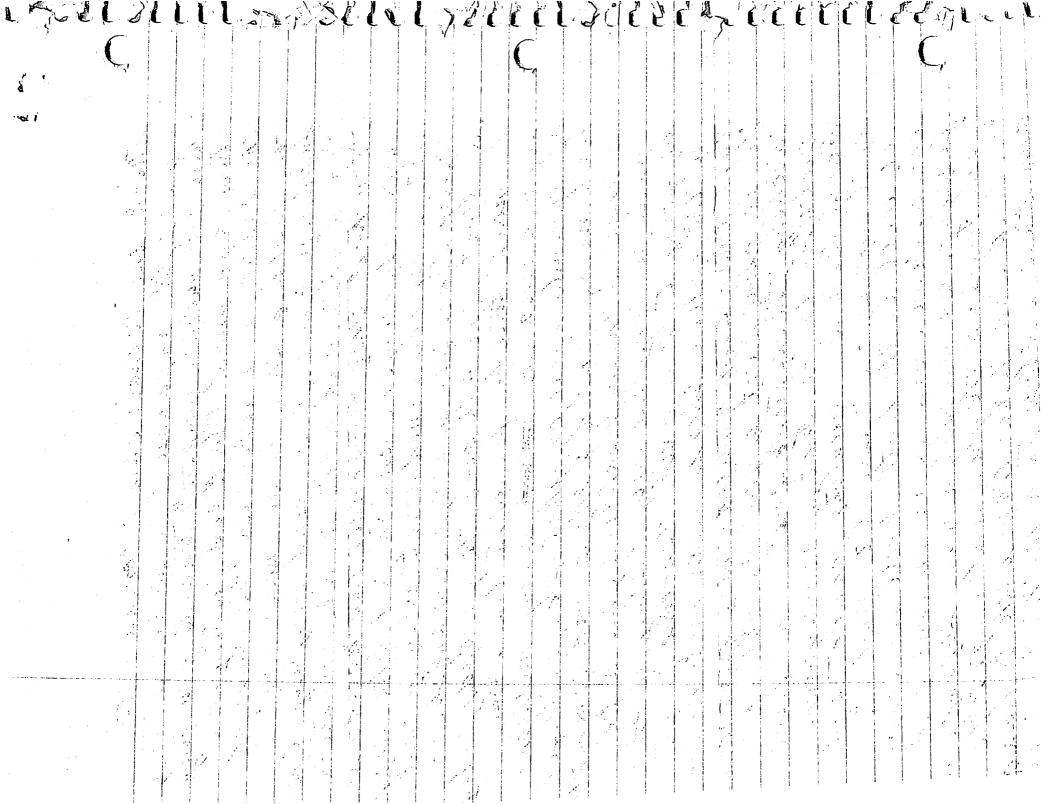
My name is fach Smuteen and fown and operate the halibrit schooner Grant."
We have just finished up our sesson and are now headed south to deliver halibrit in Seattle.

For a season that we all thought was going to be a disaster, it has tuined out surprisingly well. Mainly because of the black ed fisher, at least in our case. We have fished black cod since March 1st and it wis 75% of our gross stock for this season. I feel that the black cod fishery is absolutely essential to the alaska longline fleet, without it there is no future in longlining. We just can't make it on halibut fishing alone any more, what with the short openings, extremely low puces, for my opinion halibut fishing is a mess, there is terrible quality fish (even rotten) coming in after one day openings, and I don't see things Changing in the near future. In one season we have changed ovel to black cod as our pumary fishery and so have a lot of other boats. A side effect of this has been to take some of the pressure off of some of the halibut openings.

There are two main comments of would like to make on black edd. First, &



Less 1 roar dr are 200 B of that here B 12 who e of the 3.7 N TO PROPERTY OF THE PROPERTY OF · f 165



rate. Most undersize fish in a traw (
would die: block cod are not a hardy
fish and they tend to die quickly. A
trawl cod black cod doesn't compare
to a longline caught black cod, thats
been ploven in Oregon and California.
Thank you for reading this.

Sincerely, Jack S. Mnutsen

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