

RC-30

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ATTN: BOF Comments

Re: Proposal 6, Statewide Pacific Cod

Mr. Chairman and Members of the Board,

Thank you for this forum and opportunity to present comments regarding Cook Inlet Finfish, specifically Proposal 6 under Statewide Pacific Cod. This proposal seeks to modify the lawful gear (5AAC 28.330) and adjust the Cook Inlet P-Cod management Plan (5 AAC 28.367).

This is a reasoned proposal and brings up several important points, however I do not support this as currently written. Ostensibly this proposal seeks a noble narrative in that the by-catch of p-cod during the directed State Water Sable Fish Fishery is problematic and requires an action to remediate it. There are pro's and con's to this discussion that I would like to address as well as potential outcomes that are not mentioned in the justifications.

A brief history of my fisheries participation is in order. I have been a fisherman for 38 years, since 1975. Shrimp, crab, salmon, halibut, p-cod, sable fish and rock fish are all fisheries I have history in. I have owned and operated boats since 1978. The fisheries I currently am involved in are: PWS and C.I. sable fish, p-cod jig and halibut. I have been active in the Cook Inlet Statewide Sable Fish fishery since 2000, after the adoption of a new opening date. (The season opening date was changed to July 15 in 2000 from Jan 1).

The issue the author of Proposal 6 addresses is true. There is a high incidence of by-catch at times during the directed sable fish fishery which can be bothersome. The by-catch does vary due to changing abundance of p-cod populations; sometimes it is greater than others. That has been my observation.

The Cook Inlet Sable Fish fishery has a small quota (66,000 lbs. this season), has relatively limited or light participation, and has a slightly longer duration than what one might expect for such a small quota.

I am and will continue to be an active participant in the Cook Inlet Sable Fish Fishery and have a vested interest in any regulatory changes pertaining to this fishery.

The issue that Proposal 6 represents is a valid concern. How to address the issue of by-catch without getting into an allocation debate or creating a new fishery will prove challenging. The author proposes dedicating uncaught p-cod quota from a directed fishery (jig) to use to achieve the (stated) goal of by-catch reduction.

Taken at face value, this might seem a reasonable approach. I cannot speak to all the legal implications regarding sector splits, allocations or fishery creation, but do pose these questions and observations:

- P-Cod abundance is cyclic.
- Under harvested jig P-Cod currently goes to the pot fishery for the 'B' season.
- One of the benefits to the P-Cod jig fishery is that it is an entry level fishery, with a quota that allows for some growth.
- The authorization of transfer from jig quota to long line quota not only takes from an established sector but essentially creates a new fishery.
- Will the retention of P-Cod be mandatory? If so, quality then may become an issue as it is common to have trips that last longer than 3 days for sable fish. Often the sable fish are headed and gutted, allowing for longer trips.
- Do the canneries want P-Cod during the summer? The two buyers from Seward, where most if not all State sable fish are delivered are not in the market for P-Cod at that time. Resurrection Bay Seafood takes P-Cod as by-catch and is not interested in directed fishing. I have tried to set up markets with them in the past to that end for jig cod, to no avail. Icicle Seafood is right in the middle of heavy salmon production and does a substantial amount of halibut and black cod. They are not interested in P-Cod until their salmon production slows down, around mid August. This also from trying to set up summer markets for directed P-Cod.
- Frankly, and with no disrespect intended, this proposal appears to be an end run in establishing access to P-Cod denied through sector allocation.
- Should this pass as written it will surely value add to the directed State sable fish fishery, and in reality turn sable fish into the by-catch.
- Should this proposal pass it will undoubtedly cause an expansion in the existing fishery.
- Among the reasons for an up to 20% allowance of by-catch is to keep order in the directed fishery, allow for some retention of a harvested resource that would be wasted, and creates a disincentive to target by-catch species.
- That by-catch is an issue, the canneries seldom achieve the allowable amount of by-catch allowed per trip.

Insofar as I oppose the proposal, there are merits to it. That an allowance exists for retention of up to 20% by-catch against the targeted fish is good. The amount of by-catch does increase if also tallied against other legal fish such as halibut if one has IFQ, which in my case I do.

If this proposal is to be acted upon, by-catch limits equal to the amount of targeted species onboard would be my preference.

Thank you for your consideration,

Martin Spargo