May 29, 2004

Dr. Donald McIsaac, Executive Director
Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR. 97220

Subject: Incidental Ling Cod Allowance

Dear Don and Council Members:

It has come to the attention of the Washington Trollers Association that the coastal ling cod resource is recovering to a status that will allow increasing the total allowable catch (TAC) of ling cod in the EEZ along the Washington coast. It is well documented that the salmon Trollers, while targeting salmon, will incidentally encounter ling cod. We believe that the scientific information shows that, in fact, the ling cod specie has a good survival rate when released from incidental encounters with salmon fishing gear. However, we also understand that one of the intents of the 1996 Sustainable Fisheries Act is to reduce by-catch whenever possible.

The Washington Trollers Association is requesting that the Council review the ratio of ling cod that was landed with salmon in the years prior to the ling cod landing restrictions. Based on that information, with the idea of reducing by-catch, we request that the Council consider an incidental landing allowance of ling cod that is tied to a ratio of the salmon landed similar to the landing allowance that is currently allowed for the yellow tail rock fish. The WTA thinks this historic ratio would be in the range of one ling cod allowance to ten salmon on the vessel. By tying the ling cod landing allowance as a ratio of the salmon landed, this will help insure that the salmon fisherman does not become a directed ground fish fisher.

The Trollers do not know for sure until the historic analysis is completed, but in relationship to the anticipated harvestable biomass of ling cod, we think this allowed landing allowance of ling cod while targeting salmon will be very small. Thank you in advance for your consideration.

Sincerely,

Douglas H. Fricke
Doug Fricke, President

Cc: WDFW – Phil Anderson
    WDFW – Michael Robinson
    Mark Cedergreen
    Bob Alverson
    Jim Harp