

----- Original Message -----

Subject: Coast Depth Restrictions 3/17

Date: Wed, 17 Mar 2004 06:52:31 -0800

From: Tony Blore <Tony@arrowac-merco.com>

To: <pfmc.comments@noaa.gov>

> R Anthony Blore
> Arrowac Fisheries Inc.
>> March 17, 2004
>>> Pacific Fishery Management Council
> 7700 NE Ambassador Place, Suite 200
> Portland, Or 97220-1384

> Re: Public Comment
> Groundfish Management
> Inseason Adjustments
>> COAST DEPTH RESTRICTIONS

>> Dear Council Members,

>> Arrowac Fisheries was in continual contact with Brian Culver, NMFS, and Michelle Robinson during the end of 2003 and the beginning of 2004 about both the depth restrictions off the Coast and the new VMS requirements that went into effect in 2004. Throughout those conversations Arrowac Fisheries was told that fishing off Washington Coast would return to status quo with a depth restriction of 100 fathoms to protect rockfish. It has now come to the attention of Arrowac Fisheries that this depth management fisheries approach may result in the fishing depth restriction being moved to 150 fathoms perhaps as early as June.

> This depth restriction will be financially devastating to Arrowac Fisheries Inc, the employee's of Arrowac Fisheries, and the fishermen who derive their livelihood from the longline fishery off the coast of Washington. It appears the tradeoff for this devastation of the local economy would be to enable the council to find additional rockfish bi-catch biomass to be allocated to another user group in another State and perhaps result in additional blackcod harvest potential for another user group in another state under the management of the PMFC.

> Arrowac Fisheries depends heavily on the dogfish harvest that takes place off the Washington Coast. Moving the depth restriction to 150 fathoms would virtually eliminate the harvest of dogfish by set line fishermen resulting in economic hardship to Arrowac Fisheries, a reduction of workforce and work hours for Arrowac employees, and economic hardship for local fishermen.

> Arrowac Fisheries also depends on the set line blackcod fishery that takes place off the Washington Coast. With a depth restriction of 150 fathoms taking place in June an additional negative economic hardship would be experienced by Arrowac and it's employees. Most likely Arrowac would see a reduction in blackcod pounds delivered with those pounds generating less dollar return and reduced work hours based on reduced volume for Arrowac Employees.

> With respect to the blackcod fishery of the Washington Coast the real negative economic impact would be born by the set line fishermen. Moving the depth restriction to 150 fathoms would result in the harvest of small blackcod, generating an average revenue of about a dollar

less per pound for the fisherman's catch. Bob Alverson knows what has happened to the blackcod small fish market in recent months. With more small fish hitting the market the result will be a continual decline in the value of small blackcod.

> Moving the depth restriction to 150 fathoms will result in exactly the opposite harvest results of what the PFMC is trying to achieve. All coast blackcod fishermen know that the large blackcod appear to be moving shallower earlier each year. Moving the depth restriction to 150 fathoms will result in the local fleet attempting to take their quota in April and May. Now a Derby atmosphere will be taken place off the coast with both tribal and non tribal fishers engaged on the grounds. Excessive gear loss will take place, fighting will take place amongst fishers, excessive bi-catch will take place, and selective fishing to try to maximize larger size fish will also take place. This is the type of fishing that has been so wasteful in the past, it's the type of fishing the PFMC has virtually eliminated, and it will be the way fishing is forced to take place if the 150 fathom line is put into place.

> In addition the wasteful fishing practices will continue through the summer with larger vessels and larger quotas that will engage in the fishery after completing their Alaska fisheries. Now more gear will be required to harvest the quota if these vessels are forced outside 150 fathoms and with more fishing gear being deployed, increased bi-catch will take place. Some feel this depth restriction would force boats south to fish. Arrowac Fisheries does not feel this is the case. Last year we saw the 100 fathom depth restriction force vessels that normally fish in Oregon move to Washington waters in search of fish. As stated earlier the larger blackcod are moving shallower each year and like the Washington Coast the same thing is happening on the Oregon Coast. Moving the depth restrictions to 150 fathoms will result in the exact opposite harvest results of what the PFMC is trying to achieve.

> I am sorry that Arrowac Fisheries is not able to attend the ongoing meeting to address this serious issue in person. We were not aware that the depth restriction for set line was even being considered to be moved to 150 fathoms until yesterday. Please address our views and statements carefully. All of them are factual in substance.

> Thank you,

> Arrowac Fisheries Inc,

> R. Anthony Blore,

>>> Vice President Production, Bellingham Plant Manager