



Washington Trollers Association
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Doug Fricke, President

Washington Trollers Association

October 2, 2005

Mr. Don Hansen, Chairman
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 troll fisherman does not become a groundfish directed fishery.

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. Please do not think of this request as a targeted ling cod fishery because the allowance will be small as is the situation with the incidental landing allowance for yellowtail rockfish. A review of the yellowtail rockfish landings by the salmon trollers as an incidental by-catch will show that the individual salmon troller seldom lands his full allowance of yellowtail rockfish. This indicates that the salmon troller did not target yellowtail after completing his salmon targeting, but is merely retaining the yellowtail rockfish that he is incidentally encountering. We know that there is a Coast wide concern for the impacts on canary rockfish, but again, the landing allowance is tied to salmon targeting and will be small enough that there will be negligible incentive to target ling cod if in fact there is a correlation of canary rockfish to ling cod harvest. Thank you in advance for your consideration.

Sincerely,

Douglas H. Fricke

Doug Fricke, President

Cc: PFMC Executive Director -- Don McIsaac
WDFW -- Phil Anderson
WDFW -- Michele Culver
WDFW- Brian Culver
Mark Cedergreen
Bob Alverson
Jim Harp
Don Stevens
Kathy Fosmark

