



Alaska Longline

FISHERMEN'S ASSOCIATION

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Board Support Section
ADFG
PO Box 11526
Juneau, AK 99811-6094

Comments on 2009 Groundfish Proposals

Dear Members of the Board,

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA). ALFA's membership includes vessel owners and deckhands who own, operate or crew on setline halibut boats that target halibut and sablefish off Alaska. Our membership is committed to the sustainable harvest of marine fisheries and the sustained participation of community based hook and line fishermen in local fisheries. We have reviewed the 2009 Southeast proposals submitted to the Board of Fisheries and appreciate the opportunity to provide our recommendations. Before focusing on specific proposals, I would like to provide the Board with a more general overview on stock and fishery status in Southeast.

General

As the Board may be aware, many Southeast marine resources are in a downward trend, and catch limits for commercial fishermen have been reduced accordingly. For example, the 2009 2C longline catch limit has been reduced 19%, after dropping 42% over the previous two years. The Chatham sablefish quota is down 31% over the past 5 years, and is expected to decline again next year due to lack of recruitment. King salmon quotas are also expected to be reduced in 2009, again following a reduction between 2007 and 2008. While these are challenging times for Southeast fishermen, commercial fishing organizations have accepted conservation limits and are doing their part to maintain long-term resource health.

ALFA members recognize that rebuilding Southeast stocks demands that all sectors share in conserving the resource and respect established allocations. We are extremely disappointed to see proposal after proposal from the charter sector requesting increased harvest by their industry of salmon, lingcod and rockfish. Existing allocations were set with the full participation of all sectors and after careful evaluation by the Board of historic participation, economic dependence and resource impacts. Charter fisheries for halibut, lingcod and rockfish have repeatedly exceeded those allocations in the past three years, and charter organizations are now using these excesses as the basis for demanding more fish. If Alaska had managed fisheries on the basis of giving more to fisheries that

exceed allocations, marine resources would have collapsed long ago. That mentality has no place in Alaska. All sectors need to share the burden of conserving the resource, and living within conservation limits is part of that burden.

Finally, ALFA would like to underline for the Board the critical importance of managing the guided sport and outfitters separate from the resident subsistence, sport and personal use fishermen. **ALFA members remain committed to protecting harvesting opportunities for community members providing food for their families.** What we can not support is the reallocation of fishing opportunity from the community-based longline, troll and seine fishermen who comprise our membership to the non-resident clients of the commercial charter fleet. It is time to recognize the guided sport and outfitter industry as a high impact sector that must be controlled separately from sport and personal use fisheries. In formulating management plans, we ask that the Board take steps, where appropriate, to develop separate management plans for subsistence/personal use fishermen and the guided/assisted unguided industry.

Below are ALFA's comments on specific proposals. ALFA representatives will also attend and testify at the February Board meeting in Sitka.

Proposal 137: Support with amendment

ALFA recommends the Board replace the proposed language with a two sablefish bag limit for sport fishermen. With the exception of forage fish (herring, capelin and smelt), all other currently unregulated sport species could be managed under an aggregate bag limit established in consultation with Department staff. For a number of reasons, restricting harvest of sablefish demands immediate and specific action.

Sablefish are a long-lived species. Sablefish stocks are currently at low levels of abundance both in the Southeast Outside area and the inside waters of Chatham and Clarence Straits. The commercial longline fisheries for sablefish are fully allocated and tightly managed with individual quotas in federal waters and an equal share system in State waters. The sablefish fishery is one of the most valuable State fisheries and access privileges are extremely expensive. Sport, and particularly guided sport fisheries for sablefish should be tightly controlled to prevent undermining the health of the resource and the investments of sablefish fishermen. Charter websites and anecdotal evidence indicate a growing interest in conducting commercial sport harvest of sablefish using electric deployment and retrieval devices. ALFA urges the Board to address power assisted sport fishing (see comments on proposal 296) and to establish a two sablefish daily limit.

Proposal 286: Support

ALFA supports revision of the possession limit definition for Southeast Alaska to include preserved fish. The increased use of onboard freezers and the high freezer capacity of most lodges have completely compromised the effectiveness of existing possession limits. Given the minimal enforcement of guided sport fisheries, regulations need to unambiguously define bag and possession limits to include all fish, in any condition, until the angler returns to their domicile. In addition, ALFA urges the Board to provide enforcement officers access to the grounds and freezers of charter vessels and lodges. Enforcement officers who board commercial longline or troll vessels have free access to freezers. Clearly such access is needed in the

commercial charter fishery as well to ensure bag and possession limits are adhered to and that resource removals are fully counted.

Proposal 294: Amend

ALFA supports assessing a fee from charter operators who fish in terminal harvest areas (THA) and supports including them in the management rotation (i.e, when closed to commercial gear these areas should be closed to charter fishing). Again, ALFA urges the Board to create a separate management plan for guides/outfitters to prevent preemption of resident subsistence, sport and personal use fishermen by the commercial and largely non-resident charter sector.

Proposal 296: Support with Amendment

The growing use by guided sport and outfitters of electric or hydraulic reels to retrieve deep water species such as sablefish and slope rockfish is creating a conservation problem. Although the creel census indicates only 8 sablefish were taken in the 2008 sport fishery, the Board should remember that enforcement officers currently do not creel census remote lodges. Website pictures and advertising document a substantial harvest of sablefish and slope rockfish by guides based from remote lodges bordering Chatham Strait. Both species are fully allocated. They are also relatively slow growing and vulnerable to over-fishing. Because they spend most of their lives in deep water, sablefish have only become vulnerable to guided sport fishermen with the installation of electric or hydraulic reels. Power-assisted gear takes the sport out of sport fishing. ALFA recommends that the Board amend the proposal to prohibit the use of hydraulic or electric assist during gear retrieval. In addition, ALFA recommends the Board establish a 2 fish bag limit for sport sablefish.

Proposal 297 and 298 Oppose (see comments on proposal 296 above)

Proposal 308: Support

Personal use and subsistence fishing is a privilege afforded qualified Alaskan residents with the intent that the harvested resources will be consumed by Alaskan residents. Exploiting subsistence resources as part of a commercial enterprise is leading to overharvest and local depletion. Regularly serving subsistence harvested resources at charter lodges to non-resident paying clients violates the intent of subsistence/personal use provisions and should be prohibited.

Proposal 310: Support

ALFA supports the design and implementation of a harvest or fish ticket system in the guided sport fishery. Current accounting for finfish removals by the guided sport sector is neither timely nor accurate. The guided sport sector has a significant effect on the resource and should be managed with corresponding gravity. A harvest tag or fish ticket system will provide a more timely and accurate accounting of resource removals and facilitate more effective management. Independent verification of catch data is needed for this industry.

Proposals 311, 312 and 313: Support

ALFA supports the proposal to grant representatives of ADFG and the Department of Public Safety free and unobstructed access to charter fishing vessels, lodges and other land based or floating processing establishments to inspect catch and ensure compliance with applicable regulations. Again, such access is essential to ensure compliance with bag and possession limits

and to facilitate accurate accounting for resource removals. Southeast lodges are accounting for substantial removals of halibut, rockfish, lingcod and salmon. Existing regulations do not provide adequate access to ensure the achievement of management objectives. Enforcement personnel need ready access to facilities, including freezers, to improve the timeliness and accuracy of data collection in the guide sport sector.

Proposal 333-335: Oppose

ALFA opposes increasing the lingcod GHL for the guided sport fishery. The lingcod catch sharing plan was established through lengthy meetings that involved all sectors. In Sitka, all sectors worked together and most made compromises. The longline sector agreed to an allocation that was less than its historic share of the catch to provide increased opportunity for the directed dinglebar fishery. The dinglebar fishermen generally operate small, community-based vessels and deliver a high quality product that commands a premium market price. For several years, dinglebar vessels have been required to carry Vessel Monitoring Systems (VMS), which imposed new costs and, for many, unacceptably intrusive monitoring. Effective February 20, 2009, the VMS requirement on dinglebar vessels will be revoked. Halibut stocks are at low levels in Southeast, hence lingcod bycatch has also dropped. In 2009, salmon prices are expected to decline, along with sablefish and halibut prices. As a result, a number of local fishermen will turn to the lingcod fishery to offset losses in other fisheries. It is likely that the commercial allocation will be fully utilized in 2009, providing essential revenue to commercial fishermen and processors, and a highly valued product to consumers. There is no justification for reallocating lingcod away from the commercial longline, dinglebar and troll fisheries to the commercial charter fishery. Quota excesses SHOULD NOT lead to additional quota.

Proposal 336: Support with Amendment

ALFA agrees with the intent of the proposal, which is to provide longline fishermen the opportunity to fully harvest their lingcod allocation. While halibut stocks are at low levels, lingcod bycatch is reduced accordingly and existing rates are inappropriately low. ALFA supports providing ADFG with the authority to adjust lingcod directed fishing standards in the halibut fishery to provide the longline fleet with greater opportunity to fully harvest the sector's allocation.

Proposal 337: Oppose

ALFA does not support making "surplus" lingcod quota available to the troll fleet. Managers have no method for determining lingcod "surplus" prior to the end of the troll season.

Proposal 339: Oppose

ALFA opposes increasing the recreational harvest of lingcod beyond limits established to prevent GHL overages. There is no justification for liberalizing bag limits when recreational harvest, driven largely by guided harvest, regularly exceeds the GHL.

Proposal 340: Oppose

The sport fish allocation has been exceeded in both the NSEO and IBS. There is no justification to liberalize bag limits or combine areas.

Proposal 341: Oppose

The Board spent considerable time deliberating the appropriate Demersal Shelf Rockfish (DSR) catch sharing plan for longline and sport/guided sport fisheries only three years ago. Charter operators testifying before the Board at that time made clear that rockfish were a bycatch species taken primarily while targeting halibut. In making its decision, the Board clarified that it did not want to create a new or target guided sport fishery for DSR. Given existing declines in Southeast halibut abundance have triggered reductions in the guided sport halibut GHL, the guided sport sector should need less, rather more of a DSR allocation.

Again, the sector that has exceeded its allocation SHOULD NOT be rewarded with increased allocation. Such an action sends the wrong message to the industry. And again, the Board needs to create separate management measures for the sport and guided sport fisheries.

Proposal 345: Support

As per the lingcod comments under Proposal 336, ALFA supports vesting ADFG with the authority to set directed fishing standards (or bycatch rates) at appropriate levels to guard against allocation overages while providing the longline sector with the opportunity to fully harvest its DSR allocation. Because halibut catch limits in Southeast have been reduced 53% over the past three years, saleable rockfish associated with the halibut fishery has been dramatically reduced as well. Since Southeast longliners are required to retain ALL harvested DSR, no additional DSR will be harvested if this proposal is implemented, but additional DSR will be sold with the revenues benefiting coastal fishermen and their communities. Because the directed fishery occurs in the winter, when allowed, ADFG will be able to establish appropriate directed fishing standards without reducing the amount of DSR available to the directed fishery.

Proposal 351: Oppose

There is no conservation basis for this proposal. The longline fleet is well below their allocation of DSR. The Department requires full retention of DSR in the longline fisheries so they have an accurate accounting of DSR mortality in these fisheries. Scientific research clearly establishes that immediate decompression release is necessary for high survival of captured rockfish, something that is impossible when fish are caught on longline gear. The only effect of this proposal would be to diminish the accuracy of DSR mortality in the longline fishery.

Three years ago, the BOF directed both the charter sector and the longline sector to work towards reduction of DSR bycatch. ALFA has been proactive, securing grant money to implement a Fishery Conservation Network (FCN). The Network will assist fishermen in avoiding areas of high rockfish bycatch identified in stock assessments as well as through a fleet bycatch rate information sharing system. The FCN will provide measurable conservation benefits scaled to meet the characteristics of the longline fishery. The SEAGO proposal will undermine conservation and confound DSR accounting

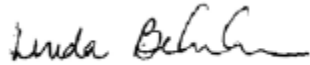
Summary

In sum, ALFA members support proposals that conserve the resource and prevent sectors from exceeding assigned catch limits. During this time of low abundance, all sectors should share in conserving the resource. Claiming that past excesses justify bigger allocations defies conservation objectives and sends a poor message to harvesters. Because the charter or guided

sport sector accounts for substantial resource removals and has demonstrated a remarkable unwillingness to conserve the resource or respect the interests of other harvesters, ALFA urges the Board to establish management measures designed specifically for this sector.

Thank you for the opportunity to comment. We will provide additional comment during the Board's meetings in Sitka.

Sincerely,

A handwritten signature in cursive script that reads "Linda Behnken".

Linda Behnken
Executive Director