

Proposal 127: Oppose

I own both Roe on Kelp permits and have fished all four of the districts. My organization has 19 members that own a combination of southern, northern, or both permits.

The Roe on Kelp fishery is very hard to explain. One of the important things that needs to be pointed out in this proposal is that these fishermen have become extremely efficient at catching herring over the last decade. Seine nets and seine equipment have evolved since the start of this fishery.

The best way PVOA could imagine to decrease the fishing stress on these stocks is to reduce the number of pens in the water needing to be filled with herring. There is a misconception that the amount of blades in a pen correlates to the amount of fish in a pen. This is not true. It is extremely difficult to measure the amount of fish in a pen. The department agrees that this is a problem. No matter how many blades we have in a pen we all simply add fish to it until "it looks full." This is why reducing the amount of pens in the fishery is the only way to control the amount of fish taken. Reduction in blades does not do this. If the department for some reason did feel it was necessary to reduce the blade allocation, they can always do it through an emergency order.

We would like to see an incentive built into the Roe on Kelp fishery kelp allocation table. If a permit were allowed more blades per permit for having double-permit pens over single and triple-permit pens over double we feel that there would consequently be less pens in the water during a fishery. I looked over the tables from the department that they cited during the committee of a whole process for proposal 127. I hope that table was submitted as an RC. PVOA would support this table being implemented. It is a solid management plan that would encourage fewer pens to be used in the fishery. It would further encourage fishermen to use fewer pens by allowing them to stack four permits in one pen. Last year in Tenakee a group did this not realizing that it was illegal. They purely sought to use fewer structures and therefore take less fish from the resource. The table created by the department is also similar to the very effect management plan currently in effect in Craig.

Some of the testimony here urges the blade allocation to be cut nearly in half. I would like to clarify that the blade allocation is not required. Some people are comfortable with 1,000 blades per permit. Anyone that is uncomfortable with this can hang fewer blades in their pens. The blade allocation is only a maximum amount, not a required amount.

The Craig Roe on Kelp fishery has been really successful for decades. We would like to see the other districts, Ernest, Hoonah, and Tenakee modeled after Craig. The table presented by the department does a good job of this. Thank you for considering these comments.

Proposal 134: Support

This issue will come up at the North Pacific Fishery Management Council at the April meeting. It will be in final action there. Here are the comments PVOA will be submitting in regards to this issue:

February 18, 2015

North Pacific Fisheries Management Council
Dan Hull, Chair
605 W Ave. Suite 306
Anchorage, AK 99501

RE: C5 GOA Sablefish Longline Pots -- Final Action

Dear Chairman Hull and Council Members,

Petersburg Vessel Owners Association is composed of almost 100 members participating in a wide variety of species and gear type fisheries. An additional thirty businesses supportive to our industry are members. Our members fish throughout Alaska from Southeast to the Bering Sea. Targeted species include crab, herring, salmon, shrimp, halibut, sablefish, and cod.

PVOA's mission statement is to:

"Promote the economic viability of the commercial fishing fleet in Petersburg, promote the conservation and rational management of North Pacific resources, and advocate the need for protection of fisheries habitat."

Petersburg Vessel Owners Association is in support of legalizing pots to fish for sablefish throughout all the waters of Alaska. We had a long meeting to discuss the pros and cons of this regulation and ultimately decided that sablefish pots would be in the best interest of the stocks. Many of our members weighed in on this issue and one of them had sablefish pot experience from the west coast to draw from. We discussed not only the impacts of this gear type but also what would be the best ways to define this gear type.

Our fishermen feel that this is a necessary step to deal with the predation issues affecting the hook and line sablefish fishery. Whales have been an increasing concern. They feed off the long line sets as they are being hauled taking an unmeasurable amount of fish from the stocks. Undefined wastage from the whales creates an issue for managing and viability of the fishery.

Sablefish pots would also reduce bycatch. Our member with experience from the west coast said there is almost no bycatch with pots. Very small fish will be released through the mesh used on pots. Escape rings would allow non-directed species to swim out while the pot is on the bottom, avoiding the trauma of being hauled to the surface before being released. Small

recruit stock sablefish would also escape this way with fewer traumas. Non-directed species that are too large to swim out of an escape ring would be spared the injury from biting a hook.

Our organization realizes that ground pre-emption is a major concern in legalizing sablefish pots. We want both gear types to be able to work together. In order to aid this we want to see a limit on the number of pots a boat can fish. A limit would prevent a large vessel from setting down an edge with as many pots as they can pack and forcing the small boats out of an area. Our members feel that 150 pots would be an appropriate limit. We wanted a limit low enough that the whole string could be packed on a limit seiner sized vessel. We are comfortable with tagging each pot to ensure no more than the limit are fished. We also appreciate that the sale of these tags provides income to the Alaska Department of Fish and Game.

Removing gear from the water when a vessel leaves the grounds to unload is another way to help prevent grounds pre-emption. Furthermore, our members felt that pots should not be left unattended longer than four days. These regulations would help space out the times fishermen are on the grounds. Finally, wet storage of pots should be prohibited to ensure hook and line fishermen are not troubled by them.

In order to aid in potential gear conflicts we support requiring the reporting of lost pots. This has been a useful tool in southeast for the Golden King crab fishery that shares grounds with hook and line fishermen. Another step we support is marking each end of a pot long line set with a buoy and reflector.

When a hook and line set is lost the hooked fish suffer predation. One of our members pointed out that more fish is lost to lost long line hook sets than to whales. Fish in a lost pot can potentially survive. Escape rings would allow small fish to leave the pot and survive. Our organization would like to see all sablefish pots have a biodegradable panel. This would ensure fish in lost pots would not be wasted.

The leasing of quota is another major issue. We propose that the regulations remain status quo for this. In southeast the quota holder must be aboard the boat and PVOA wants them to be aboard a pot boat. In the Gulf of Alaska where the regulations are different we still prefer the status quo. Boats that choose to fish pots over hook and line need to be observed and held to the same standards as the hook and line boats.

Petersburg Vessel Owners Association does not want to define the parameters of a sablefish pot. We feel that these regulations should be left to the industry. All fishermen have different preferences and styles of fishing. We feel they will develop the requirements through trial and error. This is also not a new fishery. There are many gear making companies that offer versions of pots as a stepping-stone design to fine tune.

This was not an easy issue for our organization to decide on. As with most fisheries policy, it is not black and white. There are some concerns like the consolidation of quota and loss of crew

jobs that really bother our members. At the end of the day, our organization felt that implementing pots for sablefish is the utilitarian thing to do.

In closing, our organization has put a lot of time and thought into this major decision. There are pros and cons and it is not an easy one to make. We feel that sablefish pots are a necessary transition to conserve the sablefish stocks for our future. With a little effort, both gear types will be able to work around each other.

Thank you for the opportunity to comment on these proposals.

Respectfully,

Megan O'Neil

Megan O'Neil
Executive Director