

March 5, 2013

Alaska Dept. of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811

Via fax (907) 465-6094

**RE: PETERSBURG ADVISORY COMMITTEE SUPPORT OF STATEWIDE  
PROPOSAL 370**

Dear Chairman Johnstone and Board of Fish Members:

The Petersburg Advisory Committee (the AC) voted last night to **support statewide proposal 370, modifying when bycatch in groundfish longline fisheries is determined.** This proposal was submitted by Petersburg Vessel Owners Association and will be taken up during the upcoming statewide Board of Fisheries (BOF) meeting in Anchorage. Unfortunately, we were unable to hold a meeting prior to last night, so we are submitting our comments as late comments for the upcoming March 17-21 BOF meeting in Anchorage.


We appreciate the BOF moving this proposal forward, which was initially submitted as ACR #1 at the BOF October 2013 work session. We view this proposal to be a conservation issue, as did the BOF that will result in lower bycatch discard rates as well as likely reducing "topping off" on bycatch species, such as rockfish, at the end of a groundfish or halibut longline trip. The regulation, as currently written, actually promotes wastage, is an unintended consequence and not the initial intent of the regulations. We do believe that the intent was to prevent intentional excessive bycatch of economically valuable species by limiting the bycatch to a percentage of the weight of the target species at the time of delivery. This proposal also modifies the regulation to reflect how the current regulations are actually enforced.

In addition, proposal 370 will prevent potential problems resulting from implementation of the NMFS restructured observer program for the small boat halibut and longline fisheries in 2013, particularly during federal fisheries occurring in State waters such as the 2C halibut fishery. With an increased number of observers being deployed on a larger number of vessels, and the potential for future implementation of electronic monitoring (EM) systems, situations could arise where an observer could report, as a violation, or the EM system would document when a bycatch species were retained prior to having the requisite amount of target species aboard, and trigger enforcement action irrespective of the percent species composition at the time of delivery.

Thank you for consideration of our comments.

Sincerely,

Bob Martin

  
Chairman, Petersburg Fish and Game Advisory Committee