

RC 012

## Southeast Alaska Fishermen's Alliance

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March 11, 2014

Board of Fish

Alaska Dept of Fish and Game, Board Support

Karl Johnstone, Chair

PO Box 115526

Juneau, AK 99811

RE: Support Proposal #370

Dear Chairman Johnstone and Board of Fish members,

Southeast Alaska Fishermen's Alliance (SEAFA) is a multi-species/multi gear membership based commercial fishing association. Our association has over 300 members involved in the salmon, crab, and shrimp fisheries in Southeast Alaska and longline fisheries throughout Southeast Alaska and the Gulf of Alaska in both state and federal waters.

We support proposal #370 (originally submitted as ACR 1) to amend statewide groundfish possession requirements so the retainable bycatch level of a species of groundfish is assessed at the time of the delivery. We disagree with the Dept.'s assessment of this proposal. We believe at least in regards to longline gear that more wastage of fish & bycatch will occur under the regulation as it exists with the advent of the new 2013 restructured observer program. The intent of this regulation was to prevent a boat topping off hold space with a different species than targeted such as rockfish. The regulation accomplishes that fact whether determined in the middle of a trip or at the time of landing, but if enforced as written longliners will shake bycatch species until they have enough halibut or sablefish onboard to prevent possible violations.

This proposal is also being discussed on the federal side and it's our hope that it will also pass in that arena. At some point, the council or the Board of Fish will have to take action prior to the other regulatory body so we hope that this argument doesn't prevent you from taking action.

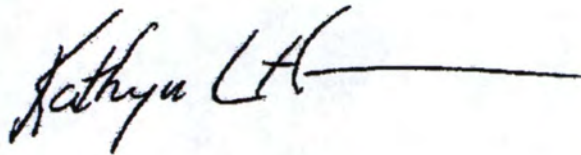
The Department commented on the ACR version of this proposal and stated, "All groundfish and halibut landings are reported on an ADF&G fish ticket and compliance

*(emphasis added) with bycatch levels is determined using fish ticket records." The enforcement is basically done after landing already and it makes sense to act on the proposal submitted and make the regulation at the time of landing.*

Southeast Alaska Fishermen's Alliance is in support of proposal #370.

Thank you for your consideration of our comments on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen" followed by a long horizontal line extending to the right.

Kathy Hansen  
Executive Director