

SSEI Emergency Petition, August 30, 2016

Alaska Department of Fish and Game Board of Fisheries PO Box 115526 Juneau, AK 99811

Email: dfg.bof.comments@alaska.gov

Subject: Comments on August 30 Meeting for the Southern Southeast Sablefish Longline Emergency Petition

Dear Members of the Board,

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA). ALFA is Sitka-based alliance of commercial vessel owners and deckhands committed to sustainable fisheries and thriving coastal communities. Our members support science-based fisheries management through collaborative research, advocacy, and innovation.

ALFA does not support the emergency petition request to allow SSEI longline permit holders to switch to pots. Although our members believe the SSEI permit holders should be the primary decision makers on the pot/longline issue for this area, we agree with the Department that this petition does not meet the Board of Fisheries criteria for emergency action---the sablefish stock is not jeopardized by longline or pot gear. Sablefish stocks have been declining in both state and federal waters due to a succession of below average year classes, not because of sperm whale or killer whale depredation.

We do recognize the economic impact to SSEI permit holders of whale depredation, and believe permit holders should have the opportunity to develop a solution. That said, allowing longline permit holders to switch to pots, which constitutes a change to existing limited entry law, is too significant and precedent setting an issue to decide through the emergency petition process. Clear evidence exists for grounds preemption when longline pots and longline hooks are allowed in the same area at the same time. We continue to support separating the two gear types into two non-concurrent seasons, but believe a solution could be identified that provides a fall harvesting opportunity for longline gear, as the proposer has suggested. Because a fall longline season would necessitate a shorter pot season, there are tradeoffs that should be discussed with all permit holders. Such a discussion is difficult during the busy fishing season and the short timeline of this emergency petition.

In sum, ALFA does not support the emergency petition to allow SSEI longline permit holders to switch to pots. We do support regulation changes that provide additional longline harvesting opportunities in this area provided they continue to temporally separate longline and pot gear. We believe the season adjustment is best made through the regular decision making process to ensure all permit holders are well informed and engaged, but recognize that the small number of permit holders involved in this fishery may make an informed emergency season adjustment possible.

Thank you for the opportunity to comment.

Sincerely,

Linda Behnken

Alaska Longline Fishermen's Association

PO Box 1229 Sitka, AK 99835

907 747.3400 office 907 738.3615 cell

www.alfafish.org