

Board of Fisheries
RE: Proposal 116
Support Annual sablefish limits for non-resident region wide

Dear Chairman Jenson and Board Members:

When I wrote my comments to the BOF, the ADFG Staff comments and catch statistics were not available, so I respectfully add these comment to support PC 134.

I am a longtime resident of Southeast Alaska. I own and operate a longline vessel out of Sitka and own a NSEI Sablefish Permit and SE Sablefish IFQ. I have invested heavily in these resources and as a year-round resident of Sitka I invest heavily in our local economy. I have served on the Sitka Fish and Game Advisory Committee for over 10 years and am well aware of the various sides of these issues.

I support the adoption of annual limits for non-resident harvest of sablefish region wide. Our Sitka Fish and Game Advisory Committee also supports annual limits and I urge you to support our local process by passing their amendment.


In 2009 the BOF voted for a southeast bag limit of 2 fish, 4 in possession with an annual limit of 8 fish. This occurred at the Southeast meeting after days of testimony and conferencing. Later that year, in an Anchorage meeting, they changed the regulation to the following: *SABLEFISH (BLACK COD) • No size restrictions—4 daily, 4 in possession. Chatham Strait and Lower Lynn Canal—District 12 (see map to right) No size restrictions. Nonresident—4 daily, 4 in possession, 8 fish annual limit, harvest record required.* Staff comments indicate that 65% of the sablefish harvest comes from outside the restricted area and half of the total harvest comes from inside waters. This means that the current regulation does not adequately address impacts to the NSEI sablefish stock as non-resident anglers can have unlimited annual limits directly adjacent to the restricted area even though ADFG manages this population as one stock.

Annual limits for non-residents are a routine management tool to provide opportunity while still placing value on a resource. It would simplify regulations and enforcement to have one regulation for non-residents for the whole region. The proposal suggests 8 fish annual limit, in line with current regulations for a portion of District 12. The Sitka Fish and Game Advisory Committee amended this to 6 fish annual limit because this fish is so valuable to residents and our local economy. Other high value, locally important species like halibut, king salmon, and lingcod have a 1 or 2 fish annual limit, so 8 fish is very generous. To suggest, as the ADFG did, that annual limits are only necessary during times of conservation crisis does not reflect their own management strategy for fish and game. Further, simplification of regulations is routinely requested by Enforcement.

Finally, state managed sablefish continues to show a declining trend and 96% of the recreational sablefish harvest is taken by non-residents. A regional annual limit for non-residents is a reasonable and appropriate tool for managing this value resource. It also simplifies regulations and places an appropriate value on this important fish. Be proactive, not reactive please.

I serve on the IPHC Conference Board so I will unfortunately miss the opportunity to serve on the Groundfish Committee. I would ask that in the future BOF work with IHPC so these important meetings do not conflict. Please address and represent my concerns within this committee.

Thank you


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