

In SUPPORT of Proposal 116: sablefish regional annual limits for non-resident sport fishermen

**Alaska Board of Fisheries
ALLOCATION CRITERIA and CONSERVATION CONSIDERATIONS**

RC 269

Alaska Statutes 16.05.251. Regulations of the Board of Fisheries. (e):

The Board of Fisheries may allocate fishery resources among personal use, sport, guided sport, and commercial fisheries. The board shall adopt criteria for the allocation of fishery resources and shall use the criteria as appropriate to particular allocation decisions. The criteria may include factors such as

(1) the history of each personal use, sport, guided sport, and commercial fishery;

Personal use: sablefish personal use regulations permit the use of no more than 350 hooks per permit for longline gear, an annual harvest limit of 50 fish per household permit, and no more than 200 fish can be retained on board a vessel when four or more sablefish personal use permit holders are present on board. A valid Alaska sport fishing license is required for personal use fishing.

The commercial fishery: In 1945, seasons were implemented in the commercial sablefish fishery to manage harvest. The resource was fully utilized in the early 80s. Limited entry was implemented in 1985 and, after an industry led effort, an Equal Quota Share system was implemented in 1994. Current market value of NSEI sablefish permits is over \$400,000; permit holders pay \$1,400 per year to the CFEC for their NSEI sablefish card. The SE state waters sablefish fishery was valued at \$5.6M in 2017, with \$2.8M derived from the NSEI fishery.

Guided Sport Fishery: The SWHS estimated a 2015 harvest of 13,338 sablefish (an increase from 2010 with a harvest of 6,705) and an estimated 10,316 sablefish in 2016. Non-resident sport fishermen account for 95% of the harvest.

District 12 is the only area with a non-resident annual limit; only 55-60% of chartered non-resident anglers met their annual limit in District 12.¹ 65% of the non-resident harvest is taken outside district 12. The table below is in numbers of fish, Juneau and Total SE.

Table 116-1.-Statewide Harvest Survey estimates of sport sablefish harvest from and outside SWHS Area E (Juneau area), by angler residency; and total Southeast Alaska Area sport sablefish harvest, 2011-2016.

YEAR	Area E (Juneau area) Harvest ^a			Harvest for Remainder of Southeast Alaska Area Excluding Area E			Southeast Alaska Area Total Harvest
	Resident	Nonresident	Total	Resident	Nonresident	Total	
2011	186	2,356	2,542	186	3,977	4,163	6,705
2012	40	2,810	2,850	194	8,754	8,948	11,798
2013	0	5,013	5,013	238	7,144	7,382	12,395
2014	435	2,614	3,049	456	5,117	5,573	8,622
2015	0	4,602	4,602	326	8,410	8,736	13,338
2016	142	4,068	4,210	63	6,043	6,106	10,316
Average 2011-16	134	3,577	3,711	244	6,574	6,818	10,529

^a Based on the SWHS all angler sablefish harvest by specific locations within Area E (cannot be done by resident and nonresident), sablefish harvest in District 12 (location of nonresident annual limit) represents an average of 85% (range of 70-93%) of total sablefish harvest in Area E during 2011-2016.

¹ Overview of the Sport Fisheries for Groundfish and Shellfish in Southeast Alaska through 2017 (RC3)

Of the Southeast Alaska Area Total Sportfish Harvest, approximately 47,000 to 57,000 pounds of sablefish have been harvested in the NSEI area and deducted from the available sablefish harvest before the AHO for the commercial NSEI sablefish fishery has been set in the past three years (see table below). On average, that poundage is equivalent to five NSEI sablefish permits, which have a market value of \$400,000, for a total reallocation of \$2 million. (For reference, the NSEI Sport harvest is 5-7% of the available harvest in NSEI).

2017 NSEI
Sablefish AHO

June 3, 2017

Table 1. Decrement types and amounts for 2011–2017. Estimated catch is in round pounds of sablefish. Notation is as follows: ADF&G = Alaska Department of Fish and Game, EQS = equal quota share, AHO = annual harvest objective.

<i>Decrement type</i>	<i>2011 estimated mortality</i>	<i>2012 estimated mortality</i>	<i>2013 estimated mortality</i>	<i>2014 estimated mortality</i>	<i>2015 estimated mortality</i>	<i>2016 estimated mortality</i>	<i>2017 estimated mortality</i>
Bycatch mortality in halibut fishery	59,128	51,779	52,114	47,514	38,963	27,915	26,136
ADF&G longline survey removal decrement(excluding catch retained by permit holders for their EQS)	50,866	77,499	77,261	80,814	74,689	53,914	29,290
Guided recreational harvest	31,109	31,181	29,601	35,944	51,910	44,509	43,656
Private recreational harvest (unguided)			7,076	7,076	5,212	7,015	3,911
Private recreational harvest, bycatch mortality in non-halibut fisheries, Subs./Personal use ¹	26,172	25,000	n/a	n/a	n/a	n/a	n/a
Discard mortality in the directed sablefish fishery			12,533	5,081	9,218	6,719	4,250
Subsistence and personal use			26,535	30,335	19,741	16,734	22,621
Total Decrements	167,275	185,459	205,120	206,764	199,733	156,805	129,863
AHO ²	880,000	975,000	1,002,162	745,774	786,748	650,754	720,250
Permit Holders	83	79	78	78	78	78	78
EQS	10,602	12,342	12,848	9,561	10,087	8,343	9,234

¹These were broken into separate decrements below as of the 2013 stock assessment when more harvest information was available from subsistence and personal use permits.

²AHO was rounded to the nearest 1,000 round pounds prior to 2013.

Source: NSEI Sablefish AHO Memo 2017 FINAL.pdf

- (2) the number of residents and nonresidents who have participated in each fishery in the past and the number of residents and nonresidents who can reasonably be expected to participate in the future;

Guided sport: 95% of the sport sablefish harvest is taken by non-residents

Commercial fishery: The C61A Northern Southeast inside sablefish longline fishery had 78 participants of which 65 were residents and 13 non-residents in 2016 with a total gross value for the fishery of \$2,803,285 and average earning of \$35,940 from a permit that was valued at \$398,900.

The C61C Southern Southeast sablefish longline fishery had 20 participants of which 17 were residents and 3 non-residents in 2016 with a total gross value for the fishery of \$1,709,772 with average gross earnings of \$85,489 with a permit that was valued at \$375,600.

The C91C Southern Southeast sablefish pot fishery had 3 participants, 2 were residents and 1 was a non-resident participant and fishery data was confidential due to number of participants.

The three commercial fisheries, with a total of 101 permit holders, has an Alaskan residency rate of 83%.²

(3) the importance of each fishery for providing residents the opportunity to obtain fish for personal and family consumption;

Residents are provided the opportunity to obtain sablefish for personal and family consumption through the personal use fishery which requires a permit, record of harvest, and has the following regulations in place:

Regulations Specific to Personal Use Sablefish Fishery:

In the **Southeastern Alaska Area**, personal use sablefish may be taken only as follows:

- A personal use fishing permit issued by the department is required to take sablefish; only one permit will be issued per household per year.
- Permit holder or a household member listed on the permit must have permit in possession when fishing.
- A permit holder's longline gear is limited to a maximum of 350 hooks in aggregate.
- **The personal use annual limit is 50 sablefish per household permit.**
- No more than 200 personal use sablefish may be retained on board a vessel when four or more sablefish permit holders are present on board that vessel.
- A permit holder shall record fishing activity on the permit Fishing Report prior to leaving the fishing site.
- A vessel or person on board a vessel commercial fishing for sablefish in the Northern Southeast Inside (NSEI) or Southern Southeast Inside (SSEI) sub-district may not operate subsistence or personal use longline gear for bottomfish from that vessel until all commercial sablefish are offloaded from the vessel.

(4) the availability of alternative fisheries resources;

WITH the proposed sablefish bag limit in place, non-resident recreational fishermen in SE will still be allowed a total groundfish/salmon daily bag limit of 35 fish.

NSEI and SSEI sablefish permits **ONLY** provide permit holders with the opportunity to fish in NSEI and SSEI respectively. Permit holders may not fish for sablefish in federal waters with a state waters permit; fishing in federal waters requires purchase of federal waters quota share.

(5) the importance of each fishery to the economy of the state;

Commercial fishery: sablefish accounted for 76–80% of the ex-vessel value of groundfish in Southeast Alaska during this reporting period.³

Sport fishery - Sablefish live at depths of 160 to over 650 fathoms. Guided sport fishing for sablefish became feasible with legalization of electric reels. Sport fishing for sablefish plays a minor role in the state's economy.

(6) the importance of each fishery to the economy of the region and local area in which the fishery is located;

² CFEC BIT DATA TABLES

³ http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2017-2018/se/WR12_FMR17-54.pdf

Commercial fishery: sablefish accounted for 76–80% of the ex-vessel value of groundfish in Southeast Alaska during this reporting period.⁴

83% of inside waters sablefish permit holders are Alaska resident.

In most years, NSEI sablefish secure the highest market value of the year for sablefish (approximately \$8 per round pound ex-vessel) and provide important “shoulder season” activity for fishermen, processors and the supply chain.

Sport fishery: 95% of sport sablefish harvest is by non-residents.

The approximately 50,000 pounds of sablefish taken by sport fishermen in recent years is roughly equivalent to the Equal Quota Share poundage assigned to five NSEI sablefish permits. At \$400,000 market value per permit, the reallocation of this poundage equates to \$2 M in permit value and \$230,850 in annual ex-vessel value.

(7) the importance of each fishery in providing recreational opportunities for residents and nonresidents.

Sablefish live at depths of 250 to 600 fathoms. Guided sport fishing for sablefish became feasible with legalization of electric reels.

95% of sport sablefish harvest is by non-residents. This annual limit is proposed for non-residents only. Alaska residents have access to the sablefish resource through sport, personal use or subsistence regulations.

Conserving stocks during times of low abundance...a commercial only responsibility?

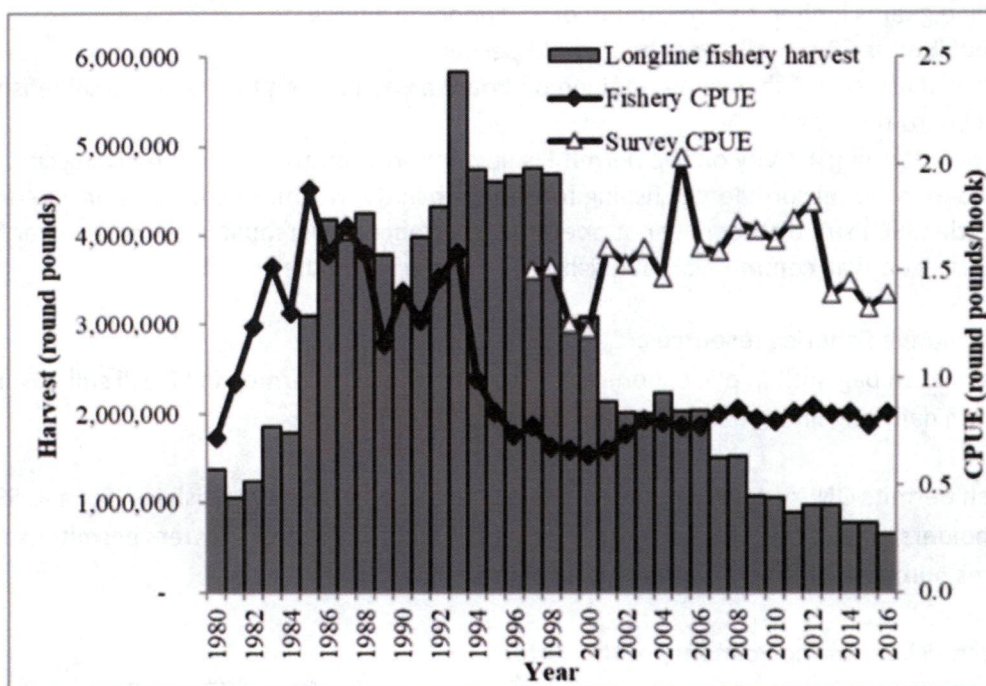


Figure 7.—Northern Southeast Inside (NSEI) Subdistrict commercial fishery harvest and catch per unit of effort (CPUE) from 1980–2016 for the sablefish directed commercial fishery and longline survey. Limited entry began in 1985, and equal quota shares began in 1994.

The commercial fishery has conserved in NSEI as the resource has declined and the harvest policy has become more conservative. The sport harvest has INCREASED as the resource has declined. 95% of sport harvest is by non-residents. Commercial permit holders have invested heavily to harvest in this area and operate under strict annual limits. 83% are resident Alaskans. Some restraint on non-resident harvest is warranted.

⁴ http://www.adfg.alaska.gov/static/reisregulations/regprocess/fisheriesboard/pdfs/2017-2018/se/WR12_FMR17-54.pdf