

Mike Wells

Rockfish Bycatch

RC032

October 12, 2023

Alaska Dept. of Fish &amp; Game

Alaska Board of Fisheries

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[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)RE: ADF&G Emergency Petition on Rockfish Bycatch

Chairman Wood, members of the Alaska Board of Fisheries;

My name is Mike Wells and I am a commercial halibut longliner who fishes exclusively in Prince William Sound, and have done so since approximately 1984. Over the last 40 years, I have participated in halibut, sablefish and pacific cod longline and pot fisheries and directed mechanical jig fisheries for rockfish in the sound.

I am writing these comments today with very short notice, after becoming aware of ADF&G's Emergency Petition and requested action by the Board of Fish to delegate authority to the Commissioner under 5 AAC 28.050 Lawful Gear for Groundfish, to close areas to commercial fishing with specific gear types by emergency order just yesterday. You will find these comments submitted as RC, because there was no opportunity to address this petition through the regular public comment period.

Given the date of Commissioner Vincent Lang's letter to Chairman Carlson Van-Dort of October 6<sup>th</sup> 2023, it is clear that this emergency petition was submitted well after the public comment period closed on September 27<sup>th</sup> for the Board's scheduled work session. It appears that there has been no public process on a petition that will have far reaching implications on the small boat commercial fishermen of Prince William Sound and elsewhere.

I would like to bring to the board's attention a few items for consideration:

This emergency petition seeks to promulgate regulation to close areas of Prince William Sound to directed commercial fishing because the 2023 rockfish GHL has been exceeded. The department is concerned that further rock fish harvests will occur given the remaining halibut season. While this is true, to date the total recorded catch of commercial rockfish for all fisheries has only exceeded the GHL by 8% or 12,000 pounds. When one looks at the average rockfish harvest over the previous ten-year time period (2013-2022) the average rockfish GHL was only exceeded in five of those ten years. In fact, in five of those years, 2017, 2018, 2019, 2020 and 2021, the GHL was not achieved in the commercial fishery. Over the entire ten-year period, considering the ups and downs of the fishery, the average harvest was 122,961 lbs of the annual 150,000 lbs rockfish GHL. I have attached a table from the ADF&G website showing these figures.

I would also like to point out that the emergency petition only seeks to close areas for commercial fisheries. The petition and the concerns listed within the commissioner's letter does not address the harvest and potential overharvest of rockfish in PWS by the sport and guided sport fishery. Having lived and worked there most of my life, it is clear to everyone in the sound that the unchecked influx of recreational fishing provided by the completion of the Whittier tunnel is beginning to have an effect on the sound. In addition, guided sport operators have had to broaden their targeted species to rockfish and even squid to book full trips given restrictions on halibut bag limits. Any conservation measures to limit the harvest of rockfish in the sound or elsewhere in Alaska must be shared by all user groups.

I would respectfully challenge the departments long held statements that the rockfish population is slow growing, extremely localized and in eminent danger of collapse. I believe the GHL table for state managed fisheries in PWS speaks for itself. How can rockfish species, subjected to commercial fishing methods of pot, longline and trawl gear, along with guided sport and uncontained sport fishing pressure even remain at harvestable levels given this theory? When in fact, the attached GHL table shows an increasing harvest from 2017 to 2023. I would suggest that the rockfish stocks in the sound are relatively stable, are replenished from outside the sound and potentially even on the increase. Possibly the department should consider reevaluating its GHL because of evidenced harvest abundance before requesting authority to close areas of PWS to federally managed fisheries.

I commend ADF&G for its efforts to conserve this important resource. However, I respectfully **oppose the adoption of ADF&G Emergency Petition on Rockfish Bycatch**, for the following reasons:

- The petition has not been fairly noticed to the public and those that will be affected.
- The data does not show an immediate conservation need
- The emergency petition does not address the totality of rockfish harvesting by all user groups in PWS.
- Closing areas to commercial fishing, which concentrates harvest effort in open areas rarely leads to a net gain for conservation. This was most recently evidenced by the departments effort to restart the PWS tanner crab fishery.
- I would strongly recommend that ADF&G form a work group to include the user groups to look at the rock fishery in PWS and come up with recommendations that reasonably address the Commissioners concerns.

Thank you for the opportunity to provide comment.

Sincerely



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From web page ADF&G/ PWS/Groundfish/Harvest - dated October12, 2023

### Prince William Sound Rockfish

Guideline harvest level (GHL) and Harvest are round weight in pounds.

Year▲▼	GHL	State Managed Harvest
2023	150,000	162,138
2022	150,000	196,843
2021	150,000	142,136
2020	150,000	82,234
2019	150,000	71,976
2018	150,000	56,452
2017	150,000	59,714
2016	150,000	161,510
2015	150,000	152,128
2014	150,000	157,458
2013	150,000	149,161
2012	150,000	113,877
2011	150,000	118,755
2010	150,000	104,901

There is no directed rockfish fishery - retained as bycatch to other directed groundfish and halibut fisheries.

Includes black and dark rockfish from federal waters. Mandatory retention required for all rockfish in PWS.