

Petersburg Vessel Owners Association

PO Box 232

Petersburg, AK 99833

Phone & Fax: 907.772.9323

pvoa@gci.net • www.pvoaonline.org

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Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

RE: SABLEFISH POT DISCUSSION PAPER, ITEM D-2.

Dear Chairman Olson and members of the Council,

The Petersburg Vessel Owners Association (PVOA) is a diverse group of commercial fishermen that participate in a variety of fisheries statewide with our foremost interest being the commercial halibut and sablefish fisheries managed by the North Pacific Management Council. PVOA appreciates the opportunity to comment on the **Sablefish Pot Discussion Paper, item D-2.**

PVOA appreciates the work of the Gulf of Alaska Sablefish Gear Committee and the thoroughness of the Sablefish Pot Discussion Paper for your consideration at the upcoming meeting. Although PVOA is **not** taking a position in support or opposition to the use of pots in GOA IFQ Sablefish fisheries at this time, we are in support of advancing the discussion paper for full analysis.

PVOA supports analysis of the items identified in the Discussion Paper but we want to ensure and emphasize that the following items are and should be included in further analysis:

1. **Limits on the number of pots allowed per string.** The greater the number of pots, the more difficult it will be to retrieve longline gear entangled with pot gear.
2. **The “footprint” for pots should be no greater than for longline gear.** The amount of bottom area taken up with pot gear needs to be equal to or less than that normally taken up by longline gear. This would likely require a limit on the number of pots per set/string or fished at any given time.
3. **Pots must be removed from the grounds when done fishing and during deliveries.** No deep water pot storage. If unattended pots then grounds will be preempted by pots, lost gear, gear entanglements and ghost fishing will

- become a significant problem and the resultant ghost fishing could result in greater loss than that due to whale depredation.
4. **Disposition of lost gear and how will lost gear be accounted for and removed.** One suggestion may be to require a “pot fee” to pay for independent/3rd party removal of lost gear. This also goes together with #1, in that having only a few pots/string may still allow for longline gear retrieval if entangled with pot gear. A string with a large number of pots would be virtually impossible to retrieve with longline gear. Large amounts of lost gear could render the grounds virtually unfishable for either longline or pot gear.
 5. **The effects of items #1 and #3 on delivery behavior.** The requirements for limiting the number of pots/string and the necessity for removing pots from the grounds during delivery could result in more small deliveries being made to outer coast communities, such as Sitka and fewer deliveries being made to “inside” communities such as Petersburg.
 6. **The effects of items #1 and #3 on consolidation.** Consolidation may occur when QS holders fish pots from larger vessels because their vessels cannot accommodate pots. Consolidation would result in fewer crew member jobs and loss of employment opportunities in small coastal communities.

Thank you for your time and attention to this important matter. If we can provide further information or answer any questions as you make this important decision, please feel free to contact us.

Sincerely,

Brian Lynch

Brian Lynch
Executive Director

ASSOCIATION