



# Alaska Longline

## FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 907.747.3400 / FAX 907.747.3462

Chairman Olson  
NPFMC  
605 West 4<sup>th</sup> Avenue Ste 306  
Anchorage, AK 99501

December 5, 2013

Agenda Item C-6 Pot Gear for Gulf Sablefish

Dear Members of the Council,

I submit these comments on behalf of the Alaska Longline Fishermen's Association (ALFA). Our organization is based in Sitka with members who target halibut and sablefish in the Gulf of Alaska, Bering Sea and Aleutian Islands.

ALFA requests that the Council add the following alternatives or options to this action:

Alternative/Option 1: Status quo (no pot fishing for sablefish) east of 142 degrees west longitude (SE/EY).

Alternative/Option 2: Status quo (no pot fishing for sablefish) east of 140 degrees west longitude (SE).

Our rationale for requesting these alternatives is below.

### Overview

The Draft analysis currently fails to capture the grounds preemption issue associated with allowing longline pots in an area. This is especially true in the Southeast/west Yakutat Area, where the shelf is steep and narrow. The geology and bathymetry of this area serve to concentrate longline effort into a narrow band, increasing the likelihood of gear conflicts. Because the shelf/slope is relatively close to shore, this is also an area harvested by small, locally based boats. Tangling longline gear with pots strains equipment and creates a highly dangerous situation as crews struggle to retrieve gear and catch. Because longline gear is lighter than pots and hauled with lower capacity hydraulic systems, gear conflicts between pots and longlines generally results in longline gear being lost. In effect, allowing pots in the Eastern Gulf significantly impacts hook and line as a viable sablefish gear due to gear loss and grounds pre-emption conflicts.

As the analysis identifies, roughly 95% of the vessels in the smaller length groups (less than or equal to 50' LOA), and 85% of vessels in the 51' to 60' LOA group are home-ported in Alaska. Many of these vessels cannot safely upgrade to pots, nor could the owners justify the \$150,000 plus conversion costs given the relatively small quota share holdings. These vessel owners have made significant investments in their boats and QS with the expectation that they could deploy longline gear without gear loss and grounds pre-emption conflicts with the heavier gear used for sablefish pots. Small boat members of the fleet may be forced to sell their quota or become quota share "riders" and harvest their quota from larger boats.

The Eastern gulf has historically support a small boat sablefish fleet and the continued viability of this fleet is essential to the area's fishery dependent communities. ALFA asks the Council to consider the effect of this action in the context of other pending Council actions affecting the small boat fleet such as raising IFQ vessel caps, the lack of an EM alternative, and the recent decision to refuse observer releases for vessels that are bunk space limited. In aggregate, these actions significantly erode fishery access for Alaska's small boat community based fleet.

### Conservation

In evaluating the effect of whale depredation on the sablefish stock, the Council should consider that the stock assessment team attributes low sablefish abundance to over a decade of average, to below-average sablefish year classes and weak recruitment; i.e., whale depredation it is not driving the sablefish stock decline. We believe the conservation gains claimed by those supporting pots for sablefish to reduce whale predation may be overstated, as is the conservation gains associated with this amendment in the analysis. As a result of this action, whale depredation may shift to the remaining vessels fishing hook and line gear in sablefish and other fisheries. A second conservation concern is the selectivity difference between hook and line gear and pots. Our understanding is that information is available from the Aleutian Island sablefish fishery as well as the State of Alaska Clarence Strait sablefish fishery and the BC sablefish fishery which illustrate the different selectivity's between the gear types. Pot gear increases fishing pressure on immature sablefish which may have undesirable conservation impacts. Whale depredation imposes an economic cost on the industry, which may be cause to consider pots for sablefish in the Western Gulf, but the conservation gains are less clear and other methods may prove more effective.

ALFA members are concerned by whale predation on longline gear, both during the survey and during the commercial fishery; we are also concerned by the relatively weak status of Gulf sablefish stocks. Our members have experienced whale predation on sablefish gear for over a decade, and have proactively worked with scientists and fishery managers to quantify and discourage predation since 2003. The collaboration, called SEASWAP (the Southeast Alaska Sperm Whale Avoidance Project), has not identified a deterrent that *stops* whale predation, but we have greatly enhanced understanding of sperm whale feeding behavior and we have identified strategies to *reduce* predation. With support from the Central Bering Sea Fishermen's Association, SEASWAP has recently broaden the research scope to include killer whale predation on both sablefish and halibut longlines. This fall, SEASWAP pilot tested a sperm whale tagging, tracking and avoidance strategy with great success, which is a strategy we intend

to expand. Through SEASWAP, we have also worked with the sablefish survey team and commercial fishermen to develop metrics to quantify predation. Our work is ongoing and motivated by concerns related to whale entanglements and the economic impacts of whale predation on commercial longline vessel.

The conservation impacts of sablefish pots that have been documented in the past (Amendment 14) are the impacts of lost gear associated with gear conflicts between longline pot and hook and line longline. We are concerned that reintroducing pots to this fishery will increase gear conflicts and gear loss and believe these conservation impacts are not captured in this analysis. **We believe these impacts are likely to be most significant in the Southeast area, which has a narrow shelf/slope and high relief terrain, as well as in traditional sablefish grounds in the West Yakutat region.** Pots lost during the early 1980s still at times claim sablefish longline gear, along with the associated fish caught on hooks not retrieved. ALFA's membership does not want to see these conflicts increased and believes the two gear types—longline pots and longline hooks—cannot share the same grounds without conflict. Again, this is especially true in the Eastern Gulf.

#### Summary

ALFA believes the conservation gains of this amendment are overstated while the economic, social, and environmental issues associated with gear conflicts and grounds preemption are understated. Allowing sablefish pots to be longlined in the Gulf will preclude longliners from traditional areas. This is especially true of the Southeast/West Yakutat Area where the shelf is narrow and steep. Because the sablefish ground are relatively close to shore in the Southeast area and therefore accessible to small boats, preempting these grounds may force QS holders with small boats to sell their quota or take that quota on a larger boat, with negative impacts to the fleet and local communities. We ask that if the Council proceeds with this amendment that the Council add alternatives or options that retain the hook and line fisheries of the Eastern Gulf.

Thank you for considering ALFA's concerns and recommendations.

Sincerely,



Linda Behnken  
(executive director, ALFA)