

Shawn McManus
17421 NE 166th PL
Woodinville, WA 98072
425-802-6571

March 14, 2021

Brief Statement of Proposal:

I propose raising the sablefish vessel pot limit in both Southeast and West Yakutat areas from 120 pots to 300 pots as well as increasing the potential gear soak time to seven days.

Objectives of proposal (What is the problem):

Currently the vessel pot limit in both Southeast and West Yakutat is 120 pots as compared to 300 pots in all other areas of the Gulf of Alaska which negatively affects sablefish vessels in the following ways:

1. A vessel restricted to 120 pots can haul their entire inventory of pots in approximately seven and a half hours. Said vessel is then forced to needlessly drift tying up the fishing grounds or haul a highly depredated hook string, for which there is no skate limit.
2. A vessel which is forced to carry the additional gear type of hooks creates more of a safety issue due to lack of proper storage on said vessel.
3. Using the two gear types of hooks and pots complicates fish landings by requiring separation of fish by gear type in the fish hold, Prior Notice of Landing for additional gear type, purchase of more costly CFEC combo card and electronic landing as well as a manual landing with NMFS per trip.

Next, the maximum time you can leave gear unattended in West Yakutat is five days whereas in Southeast you must tend the gear at all times when delivering catch and you must bring the gear to the dock when delivering to a processor as compared to seven days across all other areas of the Gulf of Alaska which effects sablefish vessels in the following ways:

1. Creates a safety issue by imposing vessels to remove their pots during bad weather.
2. Requires vessels to remove their pots from the grounds hampering progress of sablefish vessels thereby unnecessarily tying up the fishing grounds longer than is necessary.

Need and Justification for IFQ Committee/Council Action (Why can't the problem be resolved through other channels?):

IFQ proposals are typically introduced through the IFQ committee before being taken up by the NPFMC and subsequently being adopted by NMFS.

Foreseeable Impacts of Proposal (Who wins, who loses?):

All sablefish fishermen in Southeast and West Yakutat areas would be winners in the following ways:

1. Fishermen would be able to better manage their time on the fishing grounds with a 300 pot limit resulting in vessels increasing their productivity and allowing them to leave the fishing grounds sooner. This would free up room on the grounds for other vessels.
2. Fishermen would not have to haul a hook string which is subject to whale depredation thereby resulting in better sustainability and conservation of the sablefish resource.
3. Fishermen would benefit from easier landings to processors by eliminating the need for separation of sablefish in fish holds by gear type and the unnecessary additional Prior Notice of Landings for the additional gear type of hooks.
4. Fishermen would not be required to purchase the more costly sablefish CFEC combo card.
5. Allowing fishermen the opportunity for a seven day gear soak would create an additional safety measure in the event a boat finds it necessary to leave pots on the grounds during bad weather. Additionally, by allowing the gear to soak while a vessel is delivering their sablefish to the processor, said vessel will be able to more quickly expedite the grounds, thus allowing for additional vessels to find a spot to fish on the grounds.

Bottom line, this proposal creates uniformity across the GOA when concerned with vessel pot limits and pot soak time while allowing for better sustainability and conservation of the sablefish resource.

I cannot think of any sablefish fisherman who would not benefit from this proposal.

Are there alternative solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?

I am not aware of any alternative solutions. The original fears with the adoption of sablefish pots which instigated the vessel pot restrictions and soak time restrictions in both Southeast and West Yakutat have not come to be realized.

Supporting Data & Other Information. What data are available and where can they be found?

Supporting data can be found in existing NMFS regulations as well as the sablefish pot three year review.

Signature:

