

Sablefish & Halibut Pot Association

59065 Meadow Lane
Homer, Alaska 99603

North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501-2252

March 9, 2021

Dear Chairwoman Campbell;

Pot fishing sablefish, and more recently halibut, has proven to be a fishery with minimal by-catch and low discard mortality. It is a fishery with many benefits, and we believe it should be promoted and expanded over time.

The Sablefish and Halibut Pot Association (SHPA)

Support the following changes;

1. Removal of Pot Configuration Regulations
2. Uniform Pot Regulation and Pot Numbers Across Gulf of Alaska based on the CG 300 pot limit and 7 day tender requirement.
3. AIS Legalization for Marking Fishing Gear
4. Determine Correlation Between Hook and Line and Longline Pot Fishing
5. Careful Release of Small Sablefish
6. Targeting Halibut with Pots
7. Lengthen the Sablefish and Halibut Seasons
8. Promoting marketing for halibut and sablefish

Remove Pot Configuration Regulations: We believe removing all pot configuration restraints would provide pot fishermen the ability to innovate and become more selective and efficient with their fishing programs. The pot configuration rules implemented by NMFS are a cut and paste conglomeration borrowed from other fisheries that have no bearing on the current sablefish and halibut fishery. Our pot fisheries have almost no bycatch which these configuration rules were meant to reduce.

Uniform Pot Regulation and Pot Numbers Across the Gulf of Alaska: We also support uniform pot regulations across the Gulf of Alaska. The Bering Sea and Aleutian Islands have a longstanding fishing and regulatory program that presently works and we feel that should be left as it stands today. The Gulf of Alaska modifications that are needed are more extensive and we believe should include a 300-pot limit gulf wide, permit gear to be left unattended for up to 7 days in all GOA areas. We believe the present regulation that mandates a 120 pot limit and the removal of pots from the fishing grounds when delivering in SE and WY hurts all pot fishing vessels but; but most importantly, small boats, making it difficult for

new entrants to convert to the cleaner less wasteful pot fishery; that additionally, eliminates whale predation.

AIS Legalization for Marking Fishing Gear: At the present time AIS gear marking is not legal. We support its legalization. The efficiencies afforded by AIS in the fishery are necessary to prevent gear loss and reduce potential gear conflicts. This is a significant safety issue as well.

Determine Correlation Between Hook and Line and Longline Pot Fishing: This is an issue that will take time and may require grants for funding. However, determining the correlation between hooks and pots will allow for better management and eventually move the industry away from its dependence on the traditional setline survey. The existing hook and line survey has proven to be problematic with regard to the vessel completing the survey, bait and captain and crew experience. The hook and line set survey at present time is also being depredated by whales, and its accuracy is a growing concern.

Careful Release of Small Sablefish: We support the careful release of small sablefish. It is well documented that small sablefish have at least a 90% survival rate when released from a pot. It only makes sense to let these fish grow, enter the spawning biomass and become more valuable when harvested. This action needs to move forward in the NPFMC.

Targeting Halibut with Pots: At the present time the targeting of halibut by pots is not legal in the Gulf of Alaska but legal in the Bering Sea. We believe the benefits of targeting halibut with pots are significant. The resource will benefit by minimizing discard mortality and whale predation.

Lengthen the Sablefish and Halibut Seasons: Lengthening the season makes sense and would support expanding the fresh market and increase resource value. One of the direct effects of whale depredation is causing hook and line fishermen to spend more time on the fishing grounds because they have trouble attaining their quota. These fishermen are experiencing a lower CPUE and the indirect effect is the fishing grounds are becoming more congested. Sablefish quotas are not being harvested and fish has been increasingly stranded. The Magnuson/Stevens Act requires the NMFS to achieve maximum sustainable yield and lengthening the fishing season would help all fishermen.

Thanks for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'PCC' followed by a stylized flourish.

Paul Clampitt

Vice President, Sablefish and Halibut Pot Association