

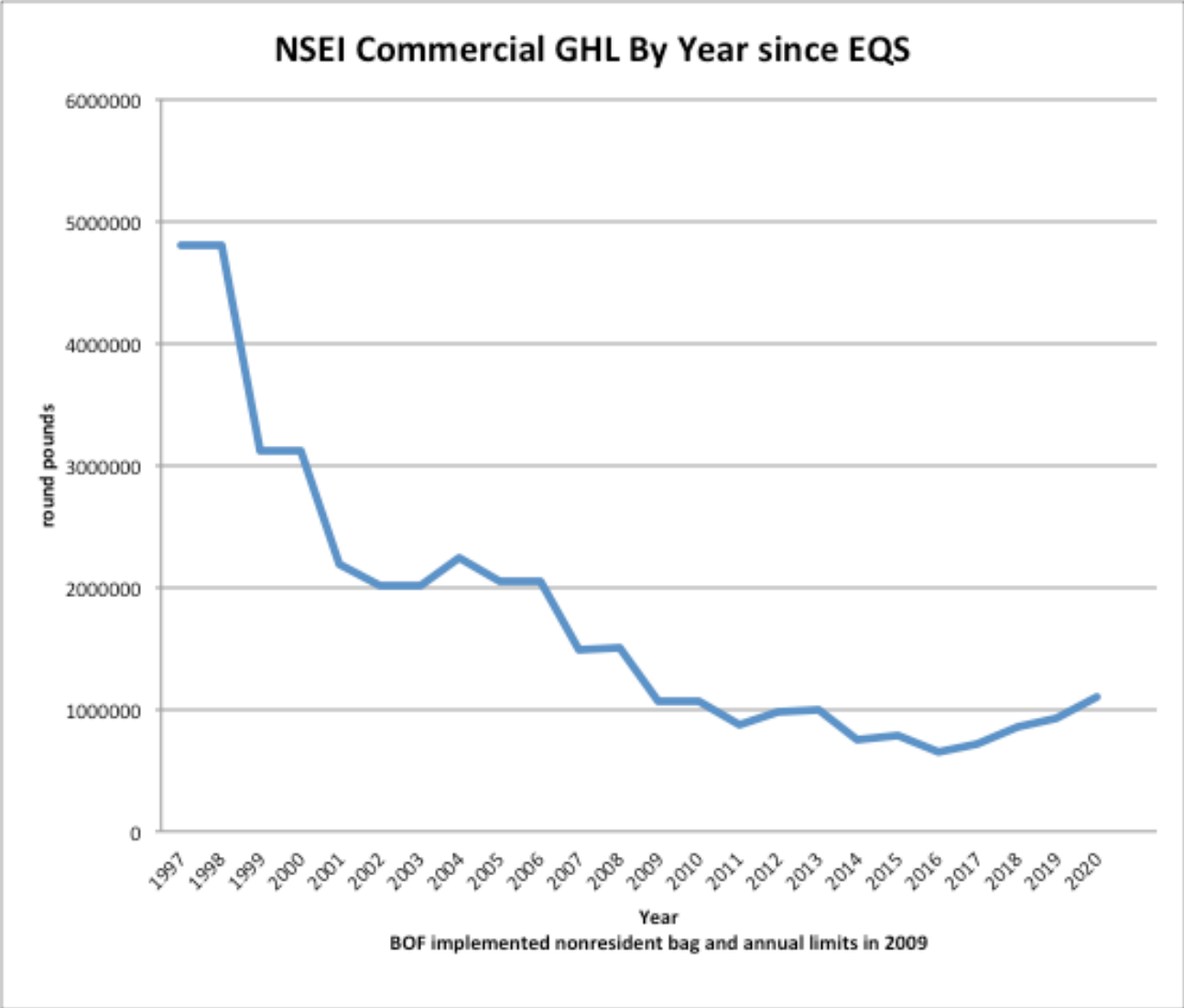
ALASKA LONGLINE FISHERMEN'S ASSOCIATION

Linda Behnken

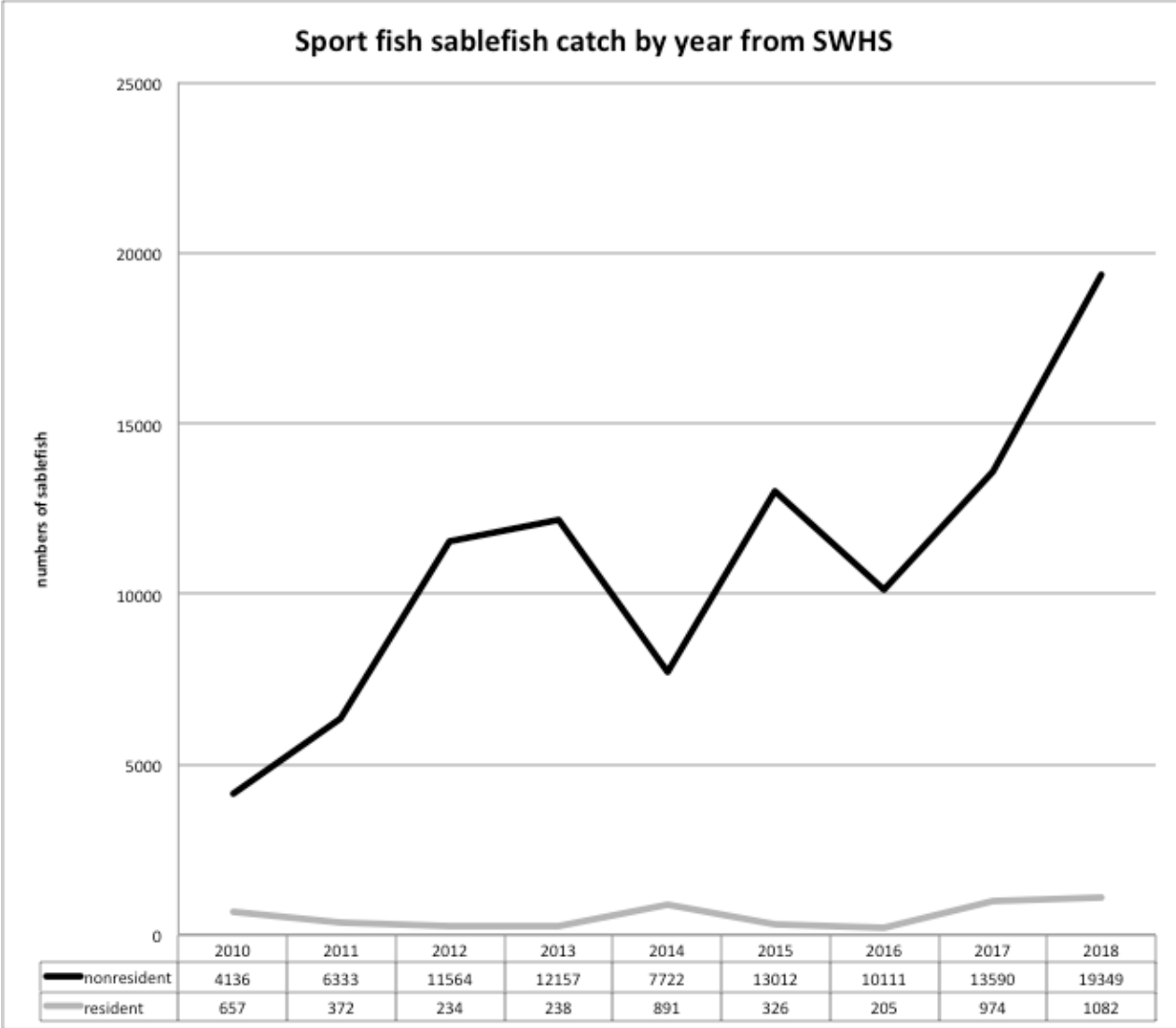
OPPOSE PROPOSAL 225

PC 013

COMMERCIAL
SABLEFISH GHL
SINCE EQS
FISHERY
ESTABLISHED



CHARTER
HARVEST:
RESIDENT VS
NONRESIDENT



OPPOSE 225

This proposal:

- Uses NSEI abundance as the index for ALL SEAK waters— federal and state
- Is NOT abundance-based— a one way allocation increase with no mechanism for reduction
- Ignores the fact that sablefish stocks are recovering from historic low levels and the commercial GHL is still 24% of 1998 levels when the EQS fishery was established.
- Calls for increasing bag limits when the GHL exceeds 1 M pounds, **but the GHL was 1.5 M when existing bag limits were set**
- Would immediately INCREASE bag limits when a conservation-based index would dictate a REDUCTION in bag limits.
- in 2021, the Department imposing a 15% limit on any annual increase in commercial GHL as additional conservation measure
- Staff comments indicate that a 6 fish bag limit would increase the nonresident catch by as much as 36% each year—more than double the annual increase limit imposed for the commercial fishery.