

Linda Behnken
Alaska Longline Fishermen's Association
March 14, 2022

Proposal 220
Re: Pots in the NSEI sablefish fishery

Because rockfish bycatch in the commercial sablefish fishery has become a focus, I would like the Board to consider two aspects of the information that has been presented:

1) Slides 21 and 22 in the Department's presentation (rockfish bycatch in the sablefish fisheries pot vs hook and line) were from the **sablefish SURVEYS**, not the commercial fishery. A number of survey stations are located in prime rockfish habitat; the commercial fishery avoids that rockfish habitat.

2) Slope rockfish is bycatch only in all commercial fisheries. Please note that the commercial catch/bycatch of all slope rockfish, all commercial target fisheries had dropped 90% since a high in 1998 and is now 112,000 pounds—which is also 50% of the 2005 bycatch level. Again—this is all commercial targets, NSEI and SSEI combined.

Sportfish slope rockfish catch in 2019 for NSEI/SSEI was just under 7,000 fish. If the average weight is 8 pounds then sport catch would be 56,000 pounds—roughly half the commercial all targets NSEI/SSEI commercial catch of slope rockfish.

Clearly pots have a lower bycatch of rockfish than hook and line, but I ask the Board to consider if rockfish catch/bycatch at current levels is a problem that needs to be solved – there is no directed slope fishery to allow for the harvest taken as part of the sablefish fishery.

ALFA is concerned about introduction of pots to the NSEI area because there is limited pot friendly substrate and strong currents, which will likely result in gear loss. It is important that heavy crab pots not be allowed, only the lighter ground pots.

We strongly oppose exclusive pot areas during the existing season. If the Board is committed to incentivizing gear switching, we do not oppose adding a two-week pot gear only fishing period to the END of the NSEI sablefish fishery. We oppose opening a pot gear season ahead of the hook and line season.

Table 11.—Slope rockfish and shortspine thornyhead reported harvest (round pounds), exvessel value, and effort in NSEI and SSEI directed commercial and groundfish and halibut commercial fisheries from 1985 to October 2020. Slope rockfish assemblage includes all deep-water species of rockfish not in the DSR and PSR assemblages.

Year	Directed harvest	Directed value	Miscellaneous finfish permits	Total harvest	Total exvessel value	Total permits
1985	13,937	—	20	24,318	—	61
1986	30,669	\$13,188	22	56,321	\$21,965	50
1987	16,901	\$7,436	42	52,181	\$25,569	127
1988	15,108	\$6,799	43	77,685	\$35,735	146
1989	18,459	\$7,014	42	102,053	\$37,760	189
1990	11,347	\$3,745	28	91,045	\$39,149	192
1991	40,801	\$16,728	30	147,386	\$66,324	232
1992	35,914	\$11,852	46	153,449	\$56,776	249
1993	52,359	\$19,373	58	175,694	\$66,764	243
1994	73,198	\$46,115	48	331,568	\$192,309	247
1995	150,625	\$88,868	91	426,904	\$273,219	369
1996	271,250	\$160,038	136	510,210	\$321,432	452
1997	369,785	\$218,173	156	622,581	\$379,774	504
1998	531,426	\$292,284	161	905,127	\$534,025	597
1999	365,389	\$219,233	170	654,469	\$412,315	628
2000	494,703	\$285,803	159	733,227	\$445,289	575
2001	268,479	\$140,273	128	487,407	\$264,544	545
2002	150,023	\$66,256	81	349,328	\$191,941	479
2003	91,108	\$36,972	41	306,946	\$161,873	454
2004	—	—	—	222,781	\$149,319	450
2005	—	—	—	264,866	\$159,856	458
2006	—	—	—	290,743	\$183,797	498
2007	—	—	—	265,029	\$144,598	505
2008	—	—	—	261,963	\$147,049	505
2009	—	—	—	212,781	\$122,669	432
2010	—	—	—	216,129	\$131,991	429
2011	—	—	—	134,876	\$82,348	354
2012	—	—	—	150,678	\$98,224	344
2013	—	—	—	149,384	\$92,391	328
2014	—	—	—	149,311	\$89,491	361
2015	—	—	—	150,115	\$93,149	352
2016	—	—	—	140,809	\$88,717	327
2017	—	—	—	140,678	\$90,955	361
2018	—	—	—	120,803	\$73,532	335
2019	—	—	—	134,887	\$91,385	366
2020	—	—	—	112,596	\$70,935	265

Note: The slope rockfish complex from 1987 to 1990 included Pacific ocean perch (POP), darkblotched, sharpchin, thornyhead, greenstripe, northern, roughey, shortraker, redbanded, and unspecified slope rockfish; and from 1991 to present includes POP, darkblotched, sharpchin, thornyhead, greenstripe, northern, roughey, shortraker, silvergray, redstripe, bocaccio, and unspecified slope rockfish. The board closed the directed fishery for slope and thornyhead rockfish in 2003 (effective July 26, 2003). Directed values and total exvessel values for 1985 to 2016 were calculated from fish ticket data and 2017–2019 were calculated from CFEC gross earnings data. The values for 2020 are preliminary numbers calculated from fish ticket data.