

RC 031



# Alaska Longline

FISHERMEN'S ASSOCIATION

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Board of Fisheries  
Alaska Dept of Fish and Game, Board Support  
Karl Johnstone, Chair  
PO Box 115526  
Juneau, AK 99811

RE: Support Proposal #370

Dear Chairman Johnstone and Members of the Board,

The Alaska Longline Fishermen's Association (ALFA) supports proposal #370 (originally submitted as ACR 1). Proposal 370 amends statewide groundfish possession requirements to calculate retainable bycatch levels at the time of the delivery, instead of landing. This proposal will reduce discards while preventing fishermen from "targeting" bycatch species. Although it would change existing regulations, the changed regulations will reflect what has been the historic practice. As the Department noted on the ACR version of this proposal: *"All groundfish and halibut landings are reported on an ADF&G fish ticket and compliance (emphasis added) with bycatch levels is determined using fish ticket records."* Historically fishermen have understood that bycatch amounts would be checked at the time of delivery and have become proficient at estimating retainable amounts in this context. Implementation of the federal observer program has created a new context for calculating bycatch allowances, and one which is now forcing unnecessary discards and waste.

ALFA respectfully disagrees with the Department's determination that proposal #307 will increase waste. The Department's comments reflect a lack of understanding relative to existing on board procedures for estimating retainable bycatch amounts on longline vessels. Proposal #307 will eliminate confusion created by the 2013 implementation of the federal observer program and the new interpretation of retention allowances inspired by the federal regulations. Fishing organizations have also asked the North Pacific Fishery Management Council to address this issue, but we would expect the Board of Fisheries to take lead given your more responsive and timely process.

Thank you for considering our comments and taking action on proposal #307.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda Behnken".

Linda Behnken (Executive Director, ALFA)