

RC 11

Petersburg Vessel Owners Association

PO Box 232

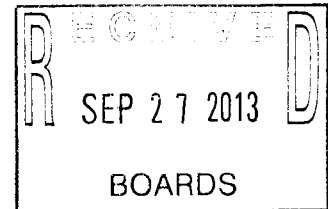
Petersburg, AK 99833

Phone & Fax: 907.772.9323

pvoa@gci.net • www.pvoaonline.org

September 27, 2013

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526



Via Fax: (907) 465-6094

**RE: BOARD OF FISHERIES 2013 ACR PROPOSALS, ADDITIONAL
COMMENTS ON ACR #1**

Dear Chairman Johnstone and Board Members,

Petersburg Vessel Owners Association (PVOA) submitted comments on the 2013 ACRs on September 20. Unfortunately, we were not in possession of nor were we aware of the Department's staff comments on the ACRs until yesterday. We are submitting additional comments specifically directed at the Department's comments on ACR #1 as late comments for the upcoming October 9-10 Board of Fisheries meeting in Girdwood.

ACR #1 was submitted by PVOA in order to address what we consider to be both fishery conservation reasons and unforeseen effects of the existing regulations. While the adherence to the ACR criteria is likely debatable for this ACR, as is also likely the case for a large percentage of ACRs, we feel that the Department's reasons for rejecting the ACR and their Additional Information are merely a re-iteration of the existing regulations that we are seeking to change and actually tend to support the acceptance of this ACR.

The Department describes the current letter of the law but the current law creates unnecessary discards when the original intent was to prevent targeting these fish during their trips. But, it is wasteful to discard a fish only because it was the first fish to come up when in a few more hooks you would have had a halibut or sablefish on board necessary to retain that bycatch. It's particularly wasteful if that bycatch is dead, as is the case with rockfish. Is this a conservation issue? Maybe not directly but it's also likely that the number of discards recorded on fish tickets is not particularly accurate, which may be a conservation concern.

The current regulations may also actually encourage targeting bycatch species, particularly rockfish. A fisherman who must discard the bycatch species at the beginning of a trip, prior to catching the request amount of target species, may make sets at the end of a trip specifically to harvest the allowable bycatch either for sale or for personal use. This activity would be completely legal and could result in higher bycatch mortality than is assumed.

We believe that our justification presented in ACR #1 for an error in regulation or to correct an effect that was unforeseen when a regulation was adopted is adequate and straight forward and needs no further explanation or comment.

In conclusion, we urge you to approve ACR #1.

Thank you for consideration of our ACR and our additional comments.

Sincerely,

Brian Lynch

Brian Lynch
Executive Director