IPHC-2017-AM093-PropO
Received: 31 October 2016

IPHC Regulations Proposal Submission Form

Proposal Title:_Clarify regulations about use/possession of pot gear while commercially fishing for halibut.

1. **Clarify if halibut may be targeted with pots in a) federal and b) state waters**
2. **Delete prohibition against carrying Dungeness crab pots on a vessel while commercially fishing for or in possession of halibut at 19(3)**

Year Proposed For: __2017_____

Submission Information (Please print or type)

Name: Phil Wyman

Affiliation: Alaska Longline Fishermen's Association

Address:____ _____

City: Sitka _____ State/Prov: AK___ Postal/ZIP Code: 99835_

Telephone:__ _____ Fax:_ _____ Email:

Signature: Phil Wyman _____

1. **What is the definition and objective of the proposal?**

Clarify regulations about use/possession of pot gear while commercially fishing for halibut.

1. Clarify if halibut may be targeted with pots in a) federal waters; and b) state waters
2. Delete prohibition against carrying Dungeness crab pots on a vessel while commercially fishing for or in possession of halibut at 19(3)

In 2017 groundfish pots will be legal in the GOA IFQ sablefish fishery, with no halibut retention limits set at this time. Final NMFS GOA sablefish pot gear regulations have not yet been published in the Federal Register, but are anticipated to allow any size pot to be deployed for sablefish provided the stretched tunnel entrance is no more than 9 inches. NMFS only has regulatory authority over federal waters. It is unclear to ALFA's membership if this regulation change will: allow halibut to be targeted with pots in federal waters or federal *and* State waters; it is also unclear if this regulation change will eliminate the existing prohibition against carrying a Dungeness crab pot onboard a halibut IFQ boat. Because IPHC regulation proposals are due prior to publication of the Final Rule for GOA sablefish pots, we are submitting this proposal to ensure these issues are addressed by the IPHC and respective managing authorities.

2. **Impacts: Describe who you think this proposed change might affect (include fishers, processors, agencies, and the public).**

2a. Who might benefit from the proposed change?

Fishermen and enforcement officers will benefit from additional clarity. Many fishermen currently are unaware that carrying a Dungeness crab pot on a boat is illegal if that boat is fishing for or has halibut on board; we are unclear as to whether this prohibition will be eliminated with legalization of pot gear in the GOA sablefish fishery. Also, ALFA's membership is also unclear whether targeting halibut with pots in federal waters or federal *and* state waters will be legal in 2017.

2b. Who might suffer hardships or be worse off? No one

3. Are there other solutions to the problem described above? If so, why were they rejected?

Continue to prohibit vessels from carrying Dungeness crab pots when they are halibut fishing, but clarify for fishermen that this regulation is still in place even with groundfish pots allowed in sablefish fishery.

Establish a maximum retainable halibut limit for the GOA sablefish fishery to prevent vessels from targeting halibut. The IPHC considered this issue last year and elected to NOT set a maximum retainable amount.

Please attach any other supporting materials. All items submitted by **October 31, 2016** will be considered at the IPHC Annual Meeting. ***Remember to include contact information and signature.***