

December 5, 2014

RC 056

Re: Prince William Proposal 26 as amended by RC 47 **OPPOSED**

Submitted by:

Julie Bonney – Alaska Groundfish Data Bank and

Bob Krueger – Alaska Whitefish Trawlers Association

Comments and concerns regarding RC47 (comments in italics, original language in plain text)

RC 47 by Northwest and AK Seiners

Amend proposal 26 as follows:

From January 20th or the opening of the PWS pelagic trawl fishery, whichever occurs first, until February 28, trawling for walleye pollock shall be limited to vessels 58' and under.

Vessels shall be limited to 100,000 lbs per trip.

Tender vessels shall be allowed to transport pollock harvested in this fishery.

A trip shall be when 100,000 lbs is caught or 24 hours after commencement of fishing effort, whichever occurs first.

We believe that a trip must end at the time of delivery to either a shorebased plant or a tender. There is no way to determine, or track, when a trip begins so there is no way to know when the trip would end other than at the time of delivery. This is a loophole that could very easily be exploited. Conversely, limiting the duration of a fishing trip to 24 hours may force a vessel to deliver before catching the 100,000 limit. Poor CPUE or bad weather could impact the ability of a vessel to catch 100,000 lbs within the 24 hour fishing time restriction.

Does the language in this amendment mean that an under 58 foot vessel could make a 100,000 pound tow, deliver it to a tender, then make another 100,000 pound tow and deliver it to a tender, etc.? If so, when fishing is good one vessel could deliver more than a million pounds within a 24 hour period if the tenders are available. Current regulations limit deliveries to a specific tender to 600,000 pounds but additional deliveries could be made to multiple tenders.

Pollock must be delivered within 24 hrs of completion of the trip.

How do you define completion of a "trip"? Does this mean the fish must be delivered to a shorebased plant or to a tender within 24 hours? Does this mean that a tender would have to offload the fish within 24 hours of having received it? The travel time to Kodiak from PWS is longer than 24 hours so delivering Pollock to Kodiak based processors would not be possible via tenders or direct delivery by the harvesting vessel.

Beginning March 1, the trip limit shall increase to 300,000 lbs and the 58' limit lifted.

On March 1, the trawl fleet will be in full production of Federal Area 630/620 Roe Pollock fishing making it unlikely that historical PWS participants would leave those fisheries to travel to PWS for a Pollock trip after March 1.

The goal of Proposal 26 was "...slowing the fishery down allowing the Alaska Department of Fish and Game to more effectively manage the fishery and its bycatch." RC 47 is an attempt to reallocate the PWS fishery to other than historic harvesters, processors and communities and does not address the goal of better management and reduction of bycatch. Our experience shows bycatch is low when CPUE is high. High CPUE mean nets are in the water for shorter periods of time which leads to reduced bycatch. Requiring multiple trips to accomplish the harvest of the same amount of fish (i.e. the 100,000# trip limit) will lead to having nets in the water for longer periods of time and may increase bycatch as CPUE varies. Truncating the fishery for the larger vessels by shortening the period of time that they are able to participate in the PWS fishery may result in them missing the most productive and clean fishing periods which could increase bycatch.

*We believe that the implications and potential unintended consequences of Proposal 26 (and proposed amendment) and Proposal 27 need to be carefully considered before action is taken. Therefore, **we encourage the board to incorporate that these proposals into the work already being undertaken by the Gulf of Alaska Pollock Workgroup.***