



Alaska Whitefish Trawlers Association

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Tom Kluberton, Chairman
Alaska Board of Fisheries
Alaska Peninsula, Chignik, Aleutian Islands-Bering Sea
Pacific Cod Meeting
Nov 30 - Dec 1
Anchorage, Alaska

RC 009

Dear Chairman Kluberton:

The Alaska Whitefish Trawlers Association (AWTA) is located in Kodiak and represents the majority of independently owned trawl vessels that harvest groundfish in the Central Gulf of Alaska (CGOA). A number of our vessels are endorsed for and fish in both the Western Gulf of Alaska (WGOA) and Bering Sea (BS).

We have carefully reviewed the proposals that have been submitted to the Board of Fisheries and that will have an impact on our industry. We take the following positions:

Proposal 10 Oppose

Proposal 11 Oppose

Proposal 15 Oppose

Proposal 16 Oppose

Proposals 10 - 11

We oppose these two proposals that would increase the guideline harvest level (GHL) for the South Alaska Peninsula area state-waters Pacific cod fishery guideline harvest level from the current level of thirty percent (30%) to either thirty five percent (35%) under Proposal 10 or forty percent (40%) under Proposal 11.

- The Pacific cod resource in the South Alaska Peninsula area is fully allocated and subscribed. Any movement of Pacific cod from Federal to State waters is a direct re-allocation from one user group to another. When Pacific cod is moved out of federal waters to state waters it moves out of a fishery available to trawl vessels and moves it to a fixed-gear pot vessel fishery.
- The majority of federally licensed trawl vessels that participate in the South Alaska Peninsula Area Pacific cod fishery are owned and operated by Alaskan residents. Moving additional Pacific cod out of the federal fishery and into the state-waters fishery amounts to taking fish away from one group of Alaskans and giving it to another group of Alaskans. Trying to determine which group of Alaskans is more worthy of harvesting these Pacific cod is very challenging and careful consideration needs to be given to the potential negative impacts of the decisions made here.
- While it may appear that the state of Alaska will somehow benefit from taking fish away from federal trawl vessels and giving it to state-waters pot vessels, the fact is that these fish



will be hauled to the same communities and delivered to the same processors where the same workers will process the fish. The fuel, groceries and other supplies required to harvest these fish will be purchased from the same vendors regardless of the gear type used.

- Careful consideration needs to be given to all participants in the South Peninsula Area Pacific cod fishery. In their comment letter, the NMFS states that "Adoption of a significantly larger GHL could require NMFS to close directed fishing to participants in the Federal Pacific cod fishery because some sector allocations in the Western GOA are already very small and further reductions in the TAC needed to accommodate a larger GHL fishery may prohibit a Federal directed fishery for those sectors. The hook-and-line catcher vessel and trawl catcher/processor sectors are two sectors most likely to face a closure to directed fishing."
- All federal participants have made substantial investments in gear and technology to harvest P. cod while minimizing bycatch. Any reallocation that limits access to the resource will lead to excessive stranded capital for these fleets.
- Increasing the amount of harvest that comes from inside 3 miles could result in overharvesting of Pacific cod in these areas, which may impact the habitat and resource so that early closures are required. This could result in stranding Pacific cod inside 3 miles which would have normally been harvested in the much larger federal waters.
- The State waters fishery does not have the observer requirements and bycatch monitoring and controls that exist in the federal fisheries. Additional harvests inside state waters could have significant negative impact on non-target species. While it is generally assumed that fixed-gear (pots) result in lower levels of Halibut and Chinook bycatch, it must not be overlooked that pots can and do have an impact on other species such as Octopus and crab. Without the requirement for observers and bycatch management in the state-waters fishery it will be very difficult to understand and quantify the impacts that the increased harvest of Pacific cod by pots will have on these other species.
- Temporal and Spatial measures have been taken to protect Stellar Sea Lions. Pacific cod harvests are split into different seasons. Careful analysis has been conducted to determine areas considered to be "critical habitat" and areas around rookeries and haul-outs have been closed. Having more harvest come out of the sensitive near-shore state waters causes concern about the negative consequences on the stellar sea lion population.
- If less Pacific cod is available to WGOA trawl vessels it has implications for other areas. Many of WGOA trawl vessels have the federal endorsements needed and will likely look to the CGOA for additional fishing opportunities. This will put increased pressure on the CGOA Pacific cod resources as well as increased competition for all federal participants involved in the harvest and processing of Pacific cod in the CGOA.
- In conjunction with the recent Pacific Marine EXPO in Seattle, AWTA hosted a meeting between CGOA and WGOA trawl harvesters. Representatives for twenty three harvesting vessels from the WGOA and CGOA trawl fisheries attended this meeting during which Proposals 10 and 11 were discussed. There was unanimous agreement that these two proposals be rejected.
- The State of Alaska is facing huge financial challenges. The Alaska Department of Fish has consumed the majority of reserve funds available to them and is facing significant cuts in funds for 2016 and 2017. With the limited amount of money available to manage all existing state waters fisheries, it is not good policy to move forward with tasking ADFG with managing larger GHL fisheries with the limited funds they have at their disposal. These larger GHL fisheries will require more staff and management expenses that do not exist.

Proposal 15

We oppose this proposal that would expand the Dutch Harbor Subdistrict state-waters Pacific cod fishery boundaries and increase the state-waters fishery guideline harvest level from three percent (3%) to nine percent (9%) of the federal Bering Sea and Aleutians Island acceptable biological catch.

Oppose - Expansion of the Dutch Harbor Subdistrict state-waters Pacific Cod fishery boundaries

The western boundary of the DHS state-waters Pacific cod fishery was established at 167 degrees W because it is east of the federal Bogoslof Stellar Sea lion foraging area. This Bogoslof area was established as critical habitat in 1993 and closed to all directed fishing in 2001. While there are some limited fishing opportunities in this area for under 60' vessels using jig or longline gear, expanding the DHS and allowing for directed fishing for Pacific cod with pots in this area causes concern for the Stellar Sea lion population.

Oppose - Increase the states-waters fishery guideline harvest level from three percent (3%) to nine percent (9%) of the federal Bering Sea and Aleutians Island acceptable biological catch.

- All of the comments regarding Proposals 10 and 11 also apply to this proposal.
- Increasing the GHL for this fishery from the current 3% to 9% increases the available harvest from the current 18 million pounds to about 53 million pounds. This is a tremendous increase of harvest of Pacific cod inside the three-mile line. As the value of this fishery triples it will attract additional effort.
- While it may appear that the fishing season could last three times as long, it is possible that there could be three times as much effort with the season potentially lasting no longer.
- It is likely that new vessels attracted to this fishery will come from other communities in Alaska or from other states, which will put the local small boat fleet at a major disadvantage.
- This expanded fishery will not create any new entry-level fishing opportunities. The vessels needed to successfully prosecute this fishery will likely be new, high cost, high performance "Super 58" vessels that cost several million dollars to build. The addition of these high performance vessels has significant implications for other fisheries in this area and around the state. The value of the Pacific cod resource available in the state-waters fishery alone is not sufficient to cover the costs and debt-service on a new vessel. These vessels will seek other fishing opportunities and will likely participate in hook and line halibut and Black cod fisheries around the state which will diminish fishing opportunities for the current fleet in those areas. Since these high performance vessels are less than 58' in length they will also be able to participate in the state-waters salmon and herring fisheries throughout the state which will have a negative impact on the existing local small boat fleets.

Proposal 16

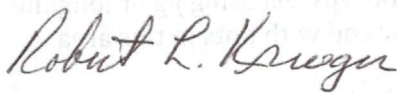
We oppose this proposal that would increase the state-waters fishery guideline harvest level from three percent (3%) to five percent (5%) and then to 7% percent (7%) of the federal Bering Sea and Aleutians Island acceptable biological catch.

- All of the comments regarding Proposal 15 also apply to this proposal.

The North Pacific Fisheries Management Council is moving forward with the development of a new management structure for trawl fisheries in the Gulf of Alaska. The interaction between federal and state-waters is an important component of the management structure. Any changes in the federal/state-water relationship need to be conducted within that process.

The established Pacific cod fishery is a critical component of the infrastructure of the Western Gulf of Alaska and Bering Sea / Aleutians Islands fisheries. We believe that the proposed changes should not be approved.

Sincerely,



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