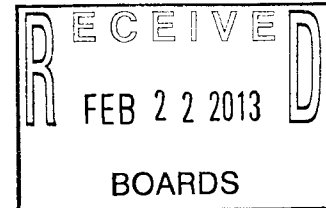


RC11

Alaska Board of Fisheries

February 18, 2013

RE: Proposal 162, Closure of Unalaska Bay



Dear Members,

I am a resident of Unalaska; I operate a small commercial fishing boat out of Unalaska and I fish for salmon, halibut, cod, and crab in this area. My livelihood has been commercial fishing since 1969. My crew is my family and we depend on healthy fisheries for our economic and physical well-being.

It is my position that Unalaska Bay should be closed to trawling because of the potential impact on the ecosystem in general, and the specific impact trawling has on bycatch species. The compromise action in February 2010 was not reasonable and did not address issues such as the lack of a sound management plan for both directed fisheries and bycatch species.

Unalaska Bay is a separate ecosystem from the Bering Sea and is unique, with a diversity of species not found in many Alaskan bays. There are directed fisheries in the Bay for halibut, salmon, crab, herring, pollock, and Pacific cod and there are not many bays in Alaska that can support such an array of fishing pressure. These species are interdependent, and what is detrimental to one can affect the others' survival.

The Trawl Fleet has an overall pollock total allowable catch (TAC) for Bering Sea Aleutian Islands (BSAI) and none specific to Unalaska Bay. The Trawl Fleet has an allowed bycatch amount for BSAI and none specific to Unalaska Bay. There is no management plan for the harvest of pollock specific to the bay and no management plan for bycatch in the bay. The pollock in Unalaska Bay are suitable for fillet lines and produce a premium-finished product, a prized fish - but a prize catch without a management plan is a recipe for overfishing both pollock and bycatch species.

Halibut are opportunistic feeders. Their diet consists of, among others, salmon and pollock, two pelagic species, and so it is common to find halibut in the pelagic zone. They have been caught on salmon troll gear, in salmon seine gear, and pelagic trawl gear.

The halibut bycatch for this area is based on an overall cap for the trawlers in the BSAI (areas 4ABCDE). The bycatch cap for 2013 is 3675 mt /7,350,000 lbs. and has remained unchanged for at least the last 4 years. The catch limit for the directed halibut fishery in the BSAI (Areas 4ABCDE) was

- 8,310,000 lbs. in 2011;
- 5,901,000 lbs. in 2012, and;
- set at 4,710,000 lbs. for 2013, a reduction of 43% in the last 2 years.

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More specifically, in area 4A, an area encompassing Unalaska Bay, the catch limit for the directed halibut fishery has been reduced from

- 2,410,000 lbs. in 2011, to
- 1,567,000 lbs. in 2012, and to
- 1,330,000 lbs. in 2013, a reduction of 45% in the last 2 years.



These are drastic reductions, yet the allowed bycatch of halibut for the trawlers remain the same. I do not think the trawl bycatch of halibut is adequately being addressed, surely not in Unalaska Bay. Note that the International Pacific Halibut Commission (IPHC) sets the catch limits for the directed halibut fishery, with stock conservation being the primary consideration. The IPHC has no authority to manage bycatch. That authority lies with the North Pacific Fisheries Management Council. Before the IPHC adopts fishery catch limits, bycatch is subtracted first.

A few years ago, there were at least four halibut charter boats working out of Unalaska. They were doing robust business, making two trips a day of six passengers, people limiting out. Today there is but one left struggling. The sport fishers and subsistence fishers now have to leave the Bay in search of a legal fish to catch.

We are fast approaching a situation where the benefit from the halibut resource is changing hands. What was once an important source of income and sustenance for the people who invested in the fishery - commercial fishers, sport fishers, and subsistence fishers, people with an economic dependency on the fishery - has become nothing but bycatch and waste to grease the wheels of trawling. This situation is not unlike that in the late 1970's when after the crash of the red crab population in the Bering Sea, and during a time when ADFG was trying to rebuild the stocks, the red crab fleet was not allowed a directed fishery but the trawlers were allowed to fish with a considerable red crab bycatch.

I am not opposed to the fishing of pollock in Unalaska Bay, but I am opposed to any fishing whether it being a directed fishery or bycatch without sound management plans.

Sincerely,

Donald Aus
F/V Good Deal