RC 057

Alaska Board of Fisheries

P.O. Box 115526

Juneau, AK 99811-5526

Re: Proposals 43,44, 45, 101 &102

January 7, 2014

Dear Chairman Johnstone and Board Members,

My name is Charlie Freeburg. I operate the F/V Alaska Beauty a 98' steel trawler out of Kodiak which derives most of it's income from trawling in the GOA, mainly the CGOA. I moved to Kodiak in 1991 with my family to trawl. My son is the engineer on the F/V Vanguard and also trawls in the GOA.

I am writing today to voice my opposition to proposals 43-45 and 101 & 102. Proposals 43-45 would do nothing to help solve the complex issues of bycatch reduction and resource allocation. On the contrary they would complicate the issue at the expense of ADF&G's budget and the historic participants income. Proposals 101 & 102 are a revisit of a notion that if fishing activity ceased in Alitak Bay and the Shelikof Strait that crab stocks would rebound. If it is that simple why is the area that has the greatest groundfishing effort (pot, pelagic and nonpelagic trawl ) ,the Barnabas gulley area, has the healthiest Tanner crab stocks. The bays of Kodiak Island have been closed to nonpelagic trawling for decades and the crab stocks have not rebounded.

I am proud to be an operator in the Kodiak resident trawl fleet. We have put aside our competitive natures and diverse self interests and creatively worked together producing voluntary catch share plans that allowed us fish and bring fish to the dock that otherwise would have been stranded because the quota was not sufficient to open the fishery or bycatch issues would have closed the season before the TAC was reached. We understand that we are a vital part of a community that provides year round employment for a resident processing labor force. Even though we are few in number we are a major source of support for Kodiak's harbor infrastructure, the new Travellift, vendors, etc...

I am requesting that the BOF instead of creating a separate management regime work together with the North Pacific Fisheries Management Council to create a new comprehensive management structure where all the parties involved work together to achieve bycatch reduction, maximum sustainable resource utilization, for the greatest economic and social good of our coastal communities. These are not Alaska or Federal fish, these are fish that swim and are harvested in both waters and need to be managed cooperatively. The NPFMC, which ADF&G has voting representation on, has done a good job at sustainably managing the resource and continues to work towards better collection of biological data and management of groundfish stocks in the GOA. I propose instead of taking final action on these proposals at this meeting the BOF schedule a Joint Protocol meeting with the Council sometime late this spring so a joint working relationship for development of a trawl bycatch management program is identified by the two regulatory bodies.

Proposals 43 and 44 are an attempt to redistribute an already over capitalized fishery to new group of participants at the expense of the historic participants. ADF&G in its comments stated it's opposition prop 43 as they weren't in favor of expanding state waters that are open to nonpelagic trawling so it is unfeasible to take 25% of the ABC of the groundfish that are only exploitable, trawl wise, with nonpelagic gear in the minute amount of state- water open to nonpelagic trawling. In addition prop 44, an attempt to reallocate 25% of the Pollock ABC overlooks the fact that Pollock do not reside full time or spawn in state- waters of Kodiak. The fish move back and forth between state and federal waters so the only management scheme that makes sense is one where the state of Alaska works with the NPFMC. Prop 44 at the Advisory Committee meeting here in Kodiak seemed to morph towards an allocation of Pollock to the Jig fleet. I would ask that before the BOF awards Pollock quota to the Jig fleet that it is established that it is feasible to commercially jig for Pollock by fishing under a commissioner's permit. Also to explore whether it would make more sense to just increase the MRA. The main thing is to not strand fish like the rockfish allocations did.

Proposal 45 is unworkable with the new ODDS program. As I stated before it I counter productive for the state to duplicate federal efforts instead of utilizing their resources to engage in the joint development of a management system that is comprehensive. Part of the new trawl management program that the NPFMC is developing is 100% observer coverage as in the Rockfish Program.

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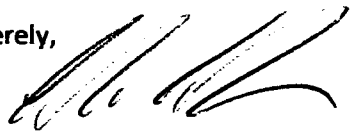
Sincerely,



Charlie Freeburg Captain

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