

ALASKA



WHITEFISH  
TRAWLERS

# Alaska Whitefish Trawlers Association

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Proposal 2    Oppose  
Proposal 3    Oppose  
Proposal 4    Oppose  
Proposal 5    Oppose

Proposal 18   Oppose  
Proposal 19   Oppose  
Proposal 20   Oppose  
Proposal 21   Oppose

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). Our member vessels also harvest groundfish in the Western Gulf of Alaska (WGOA) and Bering Sea (BS).

### Proposals 2-5

We oppose any proposal that would increase the guideline harvest level (GHL) for the Cook Inlet, Kodiak, and Chignik areas by transferring Pacific cod out of the CGOA federal fisheries and into the State Waters fisheries.

- The Pacific Cod resource in the CGOA is fully allocated. Any movement of Pacific cod from Federal to State waters is a direct re-allocation from one user group to another.
- CGOA trawl vessels and their associated processors have worked together to develop business plans for the harvest and processing of Pacific cod. Any reallocation to other sectors will disrupt this long-established relationship.
- CGOA trawl vessels have built relationships with support business and vendors and any reallocation will have a significant impact on these other businesses.
- CGOA trawl vessels not only directly harvest Pacific cod but also catch them in conjunction with our flatfish fisheries. There remain enormous abundances of unharvested flatfish and being able to harvest Pacific cod along with the flatfish provides the economic margins needed to profitable target flatfish. These flatfish harvests provide large volumes of product for our processors, which provide extended work opportunities for their employees. Flatfish harvests are conducted throughout the year and provide work for the processor workers at times when there is no other fish to process.
- The city and borough of Kodiak have invested heavily in infrastructure (harbors, shipyard, etc.) and they depend on the revenues that flow from the trawl fleet. Any reduction of Pacific cod to the trawl fleet will have a significant impact on Kodiak.
- 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.
- Temporal and Spatial measures have been taken to protect Stellar Sea Lions. Pacific cod harvests are split into different seasons. Areas around rookeries and haul-outs have been closed. Having more harvest come out of the sensitive near-shore state waters will likely result in a Section 7 consultation of the SSL protection measures.
- 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.

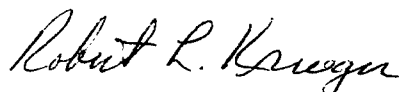
#### Proposals 18-21

We oppose any proposal that would increase the guideline harvest level (GHL) for the South Alaska Peninsula Management (SAP) area by transferring Pacific cod out of the WGOA federal fisheries and into the State Waters fisheries.

- All comments listed under Proposals 2-5 also apply in the South Alaska Peninsula Management area.
- If substantial amounts, as proposed, are transferred out of the WGOA federal waters into the state-waters fisheries, trawl vessels in the WGOA will be severely impacted. Many of these vessels have the federal endorsements needed and will likely look to the CGOA for additional fishing opportunities. This will put increased pressure on the GCOA Pacific cod resources as well increased competition for all federal participants involved in the harvest and processing of Pacific cod in the CGOA.
- If these proposals in the SAP are adopted it will potentially set a precedent for other areas.

The established Pacific cod fishery is a critical component of the infrastructure of the Central Gulf of Alaska fisheries. We believe that the proposed changes should not be approved.

Best Regards,



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