

WOHLFORTH | BRECHT | CARTLEDGE | BROOKING

A PROFESSIONAL CORPORATION

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MEMORANDUM

TO: Alaska Board of Fisheries

FROM: Chignik Marketing Association
Cheryl Brooking, Representative

DATE: October 19, 2013

SUBJECT: Support of Proposals 35 and 36
Opposition to Amendment to Proposal 15



The Chignik Marketing Association ("CMA") is a nonprofit organization composed of commercial fishers in the Chignik Management Area. CMA submitted RC-12, and is submitting additional comments following the public testimony on October 18 and 19, 2013.

Proposals 11 and 15 were submitted by the City of Chignik, at the urging of Ben Allen. After hearing the testimony and realizing the adverse consequences of these proposals, Mr. Allen informed us that he no longer supports these proposals that he prepared. CMA opposes these Proposals and asks the Board to reject them, recognizing that the person initiating these changes does not support them.

CMA opposes the suggested amendment to Proposal 15. RC-15 was submitted after the public comments period began, and provides an amendment to Proposal 15. As with the original proposal, the amended proposal would arbitrarily restrict boats longer than 48 feet, would be an improper allocation within the Chignik state-waters Pacific cod GHL and create a new fishery in Chignik, and would harm existing participants by taking away their fish. The stated purpose is to create an entry level fishery, but there is already an entry level jig fishery in Chignik. The jig quota is not being harvested, but could be if folks want to get out there and do it.

The Board has heard testimony that a new vessel length restriction, within what is already a small boat fishery, is not practical or enforceable. Vessel length alone does not, and should not, divide the quota into small boat and large boat fisheries. The following photos illustrate better than words why a vessel length distinction at 48 (or 50 feet as suggested in Proposal 8) makes no sense:



The vessel on the left is 58 feet in length, with a capacity of 60,000 pounds. The vessel on the right is 57 feet, with a capacity of 150,000 pounds.

The *Aqua Leo* shown on the next page is only 45 feet long, but is 18 feet wide with a fish hold of 870 cubic feet.



Aqua Leo

Delivered in 2012

Combination

Designer: Fred Wahl Marine Construction, Inc.

Builder: Fred Wahl Marine Construction, Inc.

Construction Material: Steel

Length: 45'-0"

Beam: 18'-0"

Depth: 7'-6"

Aft Deck Area: 27'x18'

Fish Hold #1: 870 cu.ft.

Fuel: 2,020 gal.

Fresh Water: 780 gal.

Hydraulic Oil: 140 gal.

CMA supports Proposals 35 and 36 which would establish a state-waters Pacific cod fishery in Bering Sea Area O, with exclusive registration and limited to vessels 58 feet or less using pot and jig gear. This would create a state-waters fishery where currently there is only a federal fishery. Proposals 35 and 36 would make this area consistent with other state-waters Pacific cod fisheries. There is an abundance of cod, and this would create an economic opportunity with no harm to the resource. Although some concern was expressed about sea lion protections, please keep in mind that sea lion protections are in place elsewhere (especially in Chignik) and the presence of sea lions in Area 0 should not preclude a state-waters fishery.

Thank you for your consideration.