

Comments in opposition to proposals 9,10,11,15&16

Submitted by Ed Dersham on behalf of Trident Seafoods and Alaska Groundfish Data bank

Here are some key points that speak to proposals that would increase ghl or tac in the South Peninsula, Area O and remove sea lion restrictions in Chignik.

There is significant concern about the effects of these proposals to increase ghl or tac amounts regarding the risk of sea lion concerns. The board only recently created the Area O fishery and increased the ghl in the South Peninsula. To expand area O and create a large open area in the Bogoslof protection area and greatly increase the ghl is a definite concern for reduction in sea lion prey. I reference the NMFS comments that state that. The increase in GHL allocates from fisheries predominately prosecuted by Alaskan fisherman to a different group of Alaskan fisherman and the unintended consequences could be significant.

There are 58' vessels currently being built that are up to 28 1/2' wide and have a larger capacity than some vessels twice that length. The traditional small boat local fisherman may not receive a benefit and may actually lose quota as the more the quota is increased the more super 8's may enter the fishery because it is open to entry. This part applies to both Area O and the SP. Area O has only fished 2 years under the increased ghl and the second year the quota was reached in a significantly shorter time. Further increases at this time may only further increase the race for fish. At some point the sheer volume of cod being taken from state waters likely will cause significant stellar sea lion concerns

The budget restraints currently being experienced by the state would be adversely affected by increases to quota in both areas and area in the case of area O. Increased staff time would be needed to actively manage these fisheries. It would also move fish that are caught in observed fisheries to unobserved fisheries. The state water fishery also experiences high octopus by catch which is a species of concern partly because of the lack of data that currently exists.

The South Peninsula proposals 10 & 11 would increase the GHL from 30% to 35 or 40%. This increase directly takes away from the Gulf of Alaska federal tac that is the subject of the NPFMC's bycatch reduction action in the trawl fisheries. One of the goals of this NPFMC action is to slow the race for fish and extend season lengths which is good for the resource and communities by providing processing and crew jobs for a greater portion of the year. For these reasons alone I think a wise course of action would be to put off any current increases in state managed fisheries at this time and wait until at least the fall of 2016 to see where the Council is at on gulf bycatch reduction before changing these fisheries. If by that time the board doesn't see significant progress in the the trawl bycatch reduction efforts then the board could initiate action. Delaying one cycle would be precautionary and give time to flesh out some of the significant unknown consequences of triggering action for these increases now. That would be consistent with the boards first mandate to conserve and then develop the fishery resources of Alaska.

Proposal 9 to remove the sea lion restrictions from the Chignik area would cause a formal Section 7 consultation under the ESA for sea lions as stated in the NMFS's comments which could cause major disruption to the federal fisheries. The beauty of the original state water fisheries created in 1997 was that to this day they have escaped the severe haul out restrictions for sea lions. I trust the board members will not venture into very dangerous territory by taking affirmative action on Proposal 9

In reading the public comments submitted I wish to make note of NMFS and the Freezer Longline Coalition and Tom Evich's comments as being to the point and valuable for consideration of the board.

In my 19 years of service as either a board member, an ADF&G employee or a NPFMC member I have been one of the primary defenders of Alaska's right to exert authority over its waters. I have also been a supporter of the state managed fisheries for cod as they currently exist. I also have worked to help create jig opportunity to the practicable extent possible. I can honestly say that, in my opinion, the communities of Kodiak, Sand point, and King Cove would be best served by the BOF taking no action at this time on proposals 9,10,11,15,16.

Thank you for your consideration and service on the board

Ed Dersham

Sent from my iPad