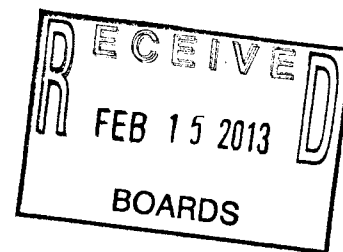


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**Frank Kelty**  
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To: BOF Comments, Boards Support Section

Date: 2-15-2013

Fax: 1-907-465-6094

From: Frank Kelty,

Subject: Board of Fisheries Comments of Frank Kelty

On proposals # 162, #163and #214

Thank You

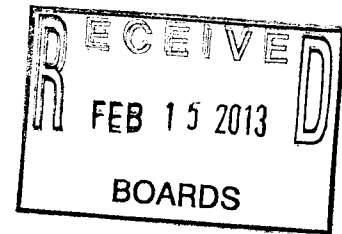
Frank Kelty

Pages 9 including cover sheet

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Frank Kelty  
PO Box 162  
Unalaska, AK 99685



February 12, 2013

Karl Johnstone, Chairman  
Alaska Board of Fisheries  
Alaska Department of  
Fish and Game Board Support  
P.O. Box 115526  
Juneau, AK 99811-5526

**Subject:** Comments on proposals 162, 163, and 214 included in the Alaska Peninsula / Aleutian Island Finfish meeting February 26-March 4, 2013 in Anchorage AK.

My name is Frank Kelty a 43 year resident of Unalaska, Alaska which is located in the middle of the Aleutian Islands 800 miles west of Anchorage adjacent to the rich fishery resources of the Bering Sea. During my years in Unalaska I have served 20 years as an elected official in the community, 10 of those years as Mayor. I have worked 30 years in the Alaska Seafood industry at two different shore-based processing plants in Unalaska. I am currently employed by the City of Unalaska as their Resource Analyst. I will be providing my personal written comments on the following Proposals 162, 163, and 214 to be heard at the Alaska Peninsula / Aleutian Island Finfish meeting February 26-March 4, 2013 in Anchorage AK.

**Proposal 162-5 AAC28.650. Closed waters in Bering Sea-Aleutian Islands Area Unalaska Bay Trawl Closure:** I strongly support the proposal submitted by the Unalaska Native Fishermen's Association (UNFA) trawling for Pollock is allowed in Unalaska Bay during the Pollock B season by the trawl catcher vessel sector from August 1<sup>st</sup> to November 1<sup>st</sup> annually. Many of Unalaska residents have a continued concern on the continued decline of the local fishery resources in Unalaska Bay area. The resources in Unalaska Bay are critical for their subsistence, sport, and personal use needs. As in most communities in rural Alaska; use of local resources is very important, in offsetting the high cost of living, a loaf of bread and a gallon of milk cost over \$5.00 in Unalaska, diesel #2 used for home heating fuel is well over \$4.00 a gallon an a gallon of gas is \$4.89 per gallon.

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There is a growing concern throughout the community of Unalaska on safety issues as local resident travel increasingly further distances out into the Bering Sea, which even during can be unforgiving even during the summer months, they travel and fish in small skiffs and other small vessels usually in then 32' foot and under range to meet their sport, personal use and subsistence needs which is used to fill there freezers for the winter. I look at this issue as basically a dependency issue. I know the local residents of Unalaska have a critical need for the local resources that they harvest in Unalaska Bay area. I find it interesting that previous Board of Fisheries supported the local residents requests and put in place, vessel size restrictions for Unalaska Bay, for vessels fishing Dutch Harbor Red King Crab and Eastern Aleutian Bairdi Tanner Crab fisheries, the BOF reduced the vessels size in Unalaska Bay to 58' feet and under, to protect the resources in the bay and to give the small boat fisherman that fish in Unalaska Bay, some protection from larger vessels.

Do the 3-5 Pollock trawl catcher vessels (CV) that are in the 100' and foot up range and harvest on a five year average close 3.2 million pounds annually out of Unalaska Bay have the same dependence on the resources as the local residents of the area? Let's take a look; the Pollock B season allocation for the CV sector in 2013 is 326,000MT in pounds 717 million pounds at a base price at of \$0.12 per pound (the Pollock B season base price in 2012,) equals 86 million dollars ex-vessel value. This doesn't include profit sharing revenues paid at the end of the season to the CV trawl fleet cooperatives.

I should add that the CV fleet most of time, comes very close to taking their total Pollock B season allocation. Now if you take at the 3.2 million pounds five average harvest from Unalaska Bay and divide it into the 673 million pounds which is the 2013 CV sector B season Pollock allocation that comes out to 0.0047% not much dependence there for fishing in Unalaska Bay. If we look at the Icicle Seafood's trawl vessel cooperative that does most of the harvesting in Unalaska Bay they control 9.7% of the CV Pollock allocation so for the 2013 Pollock B season that comes out to 32,000MT or 69 million pounds 3.2 million divided by 69 million pounds comes out 0.4% of their B season allocation. The ex-vessel value for that fish at \$0.12 per pound base price is \$390,000 or 0.05% of their total B season cooperative ex-vessel value of 8.2 million dollars.

I really don't see Icicle cooperatives dependence or need to trawl in Unalaska Bay when they catch 95% of their Pollock allocation in the rest of the Bering Sea and they certainly could harvest the other 6% as well outside of Unalaska Bay. The reason they fish Unalaska Bay is to save on fuel expenses and less running time in the hope of getting the quick trip, or topping off a load when coming back

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from the Bering Sea before delivering to the Icicle processing ship which is located in Beaver Inlet just two hours away from Unalaska Bay, conveniently located just outside the Unalaska City limits so there vessels don't have to pay the 2% local landing tax on raw fish deliveries. It should be noted that the City Unalaska has three large Pollock processing plants located inside the Unalaska city limits with close to 30 trawl CV's that fish for those operations, and for the most part none of their vessels go into Unalaska Bay and fish, because they know the sensitivity of the local residents and choose not to fish there, incurring higher operational costs but they are being a good neighbors, and it is appreciated by the local residents of Unalaska.

Where is the dependence that makes Unalaska Bay so important to half dozen Seattle based trawlers, where is the need for those 4 to 6 trawlers to have to fish in Unalaska Bay? Will it make or break their operations? No! Will Icicle Seafood's be harmed if they don't get 3 to 4 million pounds from Unalaska Bay? I don't believe so. It was pointed out many times in public testimony before the Board of Fisheries three years ago that Unalaska Bay is a very small area and the fishery resources in the bay are critical to the local residents of the community needs. It is a fact that the fleets of large catcher trawlers haven't had a problem catching hundreds of millions of pounds of Pollock in the Bering Sea during the Pollock B season. I just can't see their need or dependence to fish that area.

I would hope that the Board of Fisheries will this time will support proposal #162 that will place total trawl closure of Unalaska Bay, it the right thing to and is supported by the majority of the local residents that utilize the resources of the Unalaska Bay area for their subsistence, personal use, and sportfish needs.

**Proposal 163- 5AAC 28.640, Aleutian Islands District and Western District of the South Alaska Peninsula Area, Sablefish Management Plan.** - Modify state-waters sablefish season to coincide with federal sablefish season as follows. Black cod season in State waters will begin and end on the same date as the federal season unless the quota gets caught. I support this proposal, I thought that making the federal and state water sablefish openings and closing dates the same made good sense. This proposal was made by one of the local small boat Sablefish fishermen and it has the support of the local small boat fleet.

**Proposal 214-5ACC 01.425. Waters closed to subsistence fishing; 5ACC65.051 (4). Waters closed to sport fishing in the Alaska Peninsula and Alaska Islands Area; 5 ACC77.3XX. Waters closed to personal use fishing in the Alaska Peninsula Area.** Close the Iliuliuk River upstream of the Church Hole to subsistence, sport and personal use fishing for Coho salmon as follows:

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The entire Iliuliuk River upstream of the Church Hole to subsistence, sport and personal use fishing for Coho salmon fishing all year. This proposal was discussed at the Unalaska AC meeting in January and was amended for a total closure of sport fishing for all species of salmon, and included the entire Unalaska Lake drainage area, upstream of the Church Hole on the Iliuliuk River. It was noted at that meeting, that closures already in place for personal use and subsistence fishing in for Iliuliuk River and the Unalaska Lake drainage. I support the amendment made at the Unalaska AC meeting, especially with the poor state of returns of all salmon species and the lack of information on the number of salmon returning to this this river system. I believe that a total closure of sport fishing for all species is warranted and should include the entire Unalaska Lake drainage area upstream of the Church Hole on the Iliuliuk River. I will support having this proposal 214 amended at the committee that works on this proposal during the February 26- March 4, 2013 Board of Fisheries meeting.

Thank you for the consideration of my comments on Proposals 262, 263 and 214.

Best Regards



Frank Kelty

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## Harvest of walleye pollock and associated bycatch from pelagic trawl gear in Unalaska Bay.

Year	Number of Vessels	Walleye pollock	Pacific cod	Atka mackerel	Tanner crab	Pacific halibut	Pacific herring	Pacific salmon				
								Coho	Chum	Pink	Chinook	Sockeye
2003	18	8,138,516	4,449	7,114	0	42	3,291	0	14,550	0	1,883	0
2004	19	12,577,138	8,093	72,516	30	176	22,334	12	10,385	14	11,939	0
2005	11	2,241,169	2,511	18,611	0	56	27,186	22	3,405	586	247	0
2006	8	892,327	1,465	10,028	0	37	4,681	0	414	0	97	0
2007	12	4,137,647	12,601	1,342	0	718	2,254	2	2,378	8	8,005	0
2008	6	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF
2009	8	3,279,147	21,895	122	2	2,567	2,769	0	2,455	24	2,442	0
2010 <sup>a</sup>	5	3,861,621	85,081	45	2	4,683	3,403	8	2,678	31	104	0
2011 <sup>a</sup>	9	2,339,583	25,033	8,568	0	547	3,270	0	842	94	144	0
2012 <sup>a,b</sup>	4	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF	CF
Average	10	4,683,394	20,141	14,793	4	1,103	8,649	6	4,638	95	3,108	0

Note: CF = Confidential. Harvest shown in pounds.

Source: Data are from the ADI&G fish ticket database from ADF&G statistical area 665335.

<sup>a</sup> Unalaska Bay pelagic trawl partial closure in effect beginning mid 2010.

<sup>b</sup> 2012 data are preliminary.

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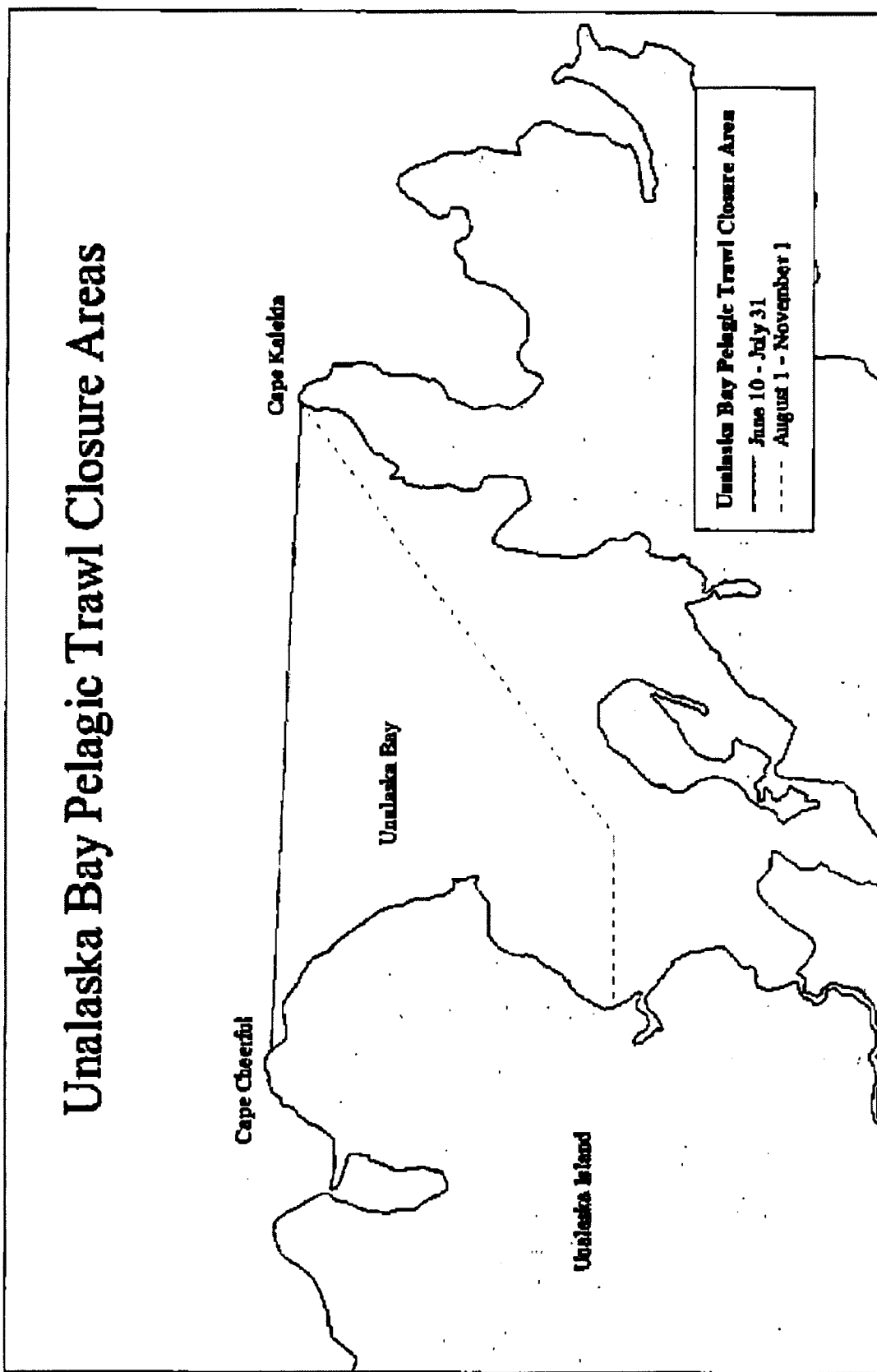


Figure 162-1. Unalaska Bay pelagic trawl closure area.

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**Bering Sea Aleutian Islands  
Seasonal Catch Report  
(includes CDQ)  
Through: 09-FEB-2013 Account: ALL**

**National Marine Fisheries Service  
Alaska Region, Sustainable Fisheries  
Catch Accounting**

**Bering Sea****Pollock, AFA Inshore CD allocation**

Season	Begin	End	Total Catch	Quota	Remaining Quota	% Taken
A	20-Jan-2013	10-Jun-2013	62,993	217,726	154,733	29%
B	10-Jun-2013	01-Nov-2013	0	326,589	326,589	0%
<b>Total:</b>			<b>62,993</b>	<b>544,315</b>	<b>481,322</b>	<b>12%</b>

**Pollock, AFA Catcher Processor**

Season	Begin	End	Total Catch	Quota	Remaining Quota	% Taken
A	20-Jan-2013	10-Jun-2013	34,949	174,181	139,232	20%
B	10-Jun-2013	01-Nov-2013	0	261,271	261,271	0%
<b>Total:</b>			<b>34,949</b>	<b>435,452</b>	<b>400,503</b>	<b>8%</b>

**Pollock, AFA Mothership**

Season	Begin	End	Total Catch	Quota	Remaining Quota	% Taken
A	20-Jan-2013	10-Jun-2013	9,869	43,545	33,676	23%
B	10-Jun-2013	01-Nov-2013	0	65,318	65,318	0%
<b>Total:</b>			<b>9,869</b>	<b>108,863</b>	<b>98,994</b>	<b>9%</b>

**Pollock CDQ**

Season	Begin	End	Total Catch	Quota	Remaining Quota	% Taken
A	20-Jan-2013	10-Jun-2013	9,710	49,880	40,170	19%
B	10-Jun-2013	01-Nov-2013	0	74,820	74,820	0%
<b>Total:</b>			<b>9,710</b>	<b>124,700</b>	<b>114,990</b>	<b>8%</b>

**Aleutian Islands****Atka Mackerel, Eastern (Trawl)**

Season	Begin	End	Total Catch	Quota	Remaining Quota	% Taken
Before A	01-Jan-2013	20-Jan-2013	0	0	0	0%
A	20-Jan-2013	10-Jun-2013	1,476	7,011	5,535	21%
B	10-Jun-2013	02-Nov-2013	0	7,011	7,011	0%
After B	02-Nov-2013	31-Dec-2014	0	0	0	0%
<b>Total:</b>			<b>1,476</b>	<b>14,022</b>	<b>12,546</b>	<b>11%</b>



RC K

NOAA Fisheries Service  
PO Box 21668  
Juneau, Alaska 99802-1668

Prepared: NOV-01-12 06:45  
Restricted Access Management  
800-304-4846

## American Fisheries Act Inshore Cooperative Permits

Issued by  
National Marine Fisheries Service - Restricted Access Management

Cooperative Name	AFA Permit	Representative	BS Subarea Allocation %
AKUTAN CATCHER VESSEL ASSOCIATION	101	CHRISTIAN ASAY	32.263
ARCTIC ENTERPRISE ASSOCIATION	102	CHRISTIAN ASAY	0.000
NORTHERN VICTOR FLEET COOPERATIVE	103	PAT HARDINA	9.684 ← <i>Circle Sea Foods</i>
PETER PAN FLEET COOPERATIVE	104	MIKE MARTIN	2.347
UNALASKA CO-OP (ALYESKA)	105	KENNETH TIPPETT	11.041
UNISEA FLEET COOPERATIVE	106	JOSEPH SULLIVAN	26.483
WESTWARD FLEET COOPERATIVE	107	MARCUS ALDEN	18.183
AFA CATCHER PROCESSORS	200		
AFA MOTHERSHIPS	300		
PENDING	999		
<b>TOTAL FOR INSHORE COOPERATIVES</b>			<b>100.001</b>

Notes: Cooperative permits expire December 31st of the year for which they are issued.  
The BS subarea open access fishery receives the remainder of the inshore allocation.