



Alaska Whitefish Trawlers Association

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Alaska Board of Fisheries
Chignik Finfish meeting
December 5-6

Proposal 43 - 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 vessels also harvest groundfish in the Western Gulf of Alaska and Bering Sea.

AWTA opposes proposal 43 which seeks to establish a new state-waters trawl fishery for twenty-five percent (25%) of all species of groundfish in the Gulf of Alaska. This proposal would not move 25% of the federal groundfish TAC inside of 3 miles because fish have tails and go where they want. This proposal would grant, to a limited number of less than 58' vessels, access to those fish but it would be impossible to catch because they don't exist inside state waters. For example, this proposal would result in moving access to 41,336,250 lbs. of Arrowtooth Flounder into state waters. There is not that much Arrowtooth inside three miles.

This proposal does not specifically name the type of gear that would be used but flatfish can only be harvested with non-pelagic (bottom) trawl. To access the deep-water and shallow-water flatfish, Arrowtooth flounder, skates and other species, the state would either have to allow non-pelagic (bottom) trawling in all of the bays and other state waters or deny access to these fish. The economic impact of denying access to 25% of these different species would be huge, with harvesters, processors, processor workers, vendors, and coastal communities bearing the burden, all so that a small number of under 58' vessel could have their own private fishery.

Table 1 displays very clearly that this proposal is completely unworkable. This proposal states that there would be a 150,000 trip limit with a vessel being able to deliver only once every 72 hours (3 days). Moving access to 25% of the Central Gulf of Alaska TAC inside three mile would result in 144,587,589 pounds of groundfish. It would take 964 trips (150,000 lbs. each) and would take 2,892 days (1 deliver/3days). There are currently 4 under 58' vessels that could be considered to be active in the CGOA. This means that each vessel would have to start fishing on January 1, make a delivery every 3 days throughout the year (never stopping for fuel, groceries, or other fisheries) and it would take 723 days (1.98 years) for these 4 vessels to catch the fish!

This proposal calls for PSC management and 100% observer coverage in all of these new fisheries inside of state waters. The process of designing, developing the regulatory structure, implementing and managing these new PSC management and observer requirements would be incredibly complex, expensive and impossible to do in any reasonable time frame. While you

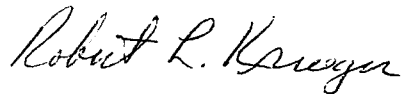
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could expect the vessels to pay for on-going observer coverage, the state would have to pay for all of the costs necessary to develop and implement this program.

This proposal is very poorly thought out with no consideration of the impacts on critical habitat and the implications regarding the measures that have been taken to protect Stellar Sea Lions. To create a program designed to permit the harvest of over 144,000,000 pounds of groundfish in the sensitive near-share areas is a very bad idea. The potential economic harm done to the Gulf of Alaska fishing industry and the people who depend on the groundfish fisheries for their livelihood must be recognized.

This proposal should be eliminated!

Sincerely,



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Table 1 - State-waters all species trawl groundfish fishery

Species	2013 TAC		25%	# of 150,000 trips	# of days 3 day/trip	# of years	Number of 58' boats	days per 58'boat	Years per 58' boat
	Metric Tons	2013 TAC (lb)							
Pollock (620 630 WYAK)	78,815	173,755,549	43,438,887	290	869	2.38	4	217	0.60
Pacific Cod (CGOA)	36,966	81,495,244	20,373,811	136	407	1.12	4	102	0.28
Sablefish (CGOA)	5,540	12,213,484	3,053,371	20	61	0.17	4	15	0.04
Shallow flats (CGOA)	18,000	39,682,800	9,920,700	66	198	0.54	4	50	0.14
Deep flats (CGOA)	2,308	5,088,217	1,272,054	8	25	0.07	4	6	0.02
Rex Sole (CGOA)	6,376	14,056,530	3,514,132	23	70	0.19	4	18	0.05
Arrowtooth (CGOA)	75,000	165,345,000	41,336,250	276	827	2.27	4	207	0.57
Flathead Sole (CGOA)	15,400	33,950,840	8,487,710	57	170	0.47	4	42	0.12
POP (CGOA)	10,926	24,087,460	6,021,865	40	120	0.33	4	30	0.08
Nrht Rockfish (CGOA)	3,122	6,882,761	1,720,690	11	34	0.09	4	9	0.02
Shortraker (CGOA)	452	996,479	249,120	2	5	0.01	4	1	0.00
Dusky Rockfish (CGOA)	3,533	7,788,852	1,947,213	13	39	0.11	4	10	0.03
Rougheye (CGOA)	856	1,887,138	471,784	3	9	0.03	4	2	0.01
Thornthead (CGOA)	766	1,688,724	422,181	3	8	0.02	4	2	0.01
Other Rockfish (CGOA)	606	1,335,988	333,997	2	7	0.02	4	2	0.00
Big Skate (CGOA)	1,793	3,952,848	988,212	7	20	0.05	4	5	0.01
Longnose Skate (CGOA)	1,879	4,142,443	1,035,611	7	21	0.06	4	5	0.01
Totals	262,338	578,350,355	144,587,589	964	2,892	7.92	4	723	1.98