



## Alaska Whitefish Trawlers Association

RC 010

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Alaska Board of Fisheries  
Chignik Finfish meeting  
December 5-6

### Proposal 44 - 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 44 which seeks to establish a new Central Gulf of Alaska state-waters trawl fishery for twenty-five percent (25%) of all Pollock from areas 62, 630, and 640. It would also establish a new Western Gulf of Alaska state-waters trawl fishery for twenty-five percent (25%) of all Pollock from area 610.

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. The federal Pollock fisheries were a central part of the dialogue regarding the protection of Stellar Sea Lions. There was concern that the removal of Pollock as a food source may cause nutritional stress on the sea lion population. To minimize the potential for negative impacts, the federal Pollock fishery is divided into multiple seasons (A, B, C, and D) in multiple areas (610, 620, 630, and 640) with only a portion of the available TAC made available to each season and area. Areas adjacent to rookeries and haul-outs were closed. **The creation of a state-waters Pollock fishery designed to permit the harvest of over 43,438,887 pounds of Pollock (based on 2013 TAC) in these sensitive near-shore areas is a very bad idea.** It will trigger a full Section 7 consultation of the Stellar Sea lion regulations and additional closures will likely be mandated.

The management of Pollock in the Gulf of Alaska is a complex task and the idea that you can take a significant portion of the Pollock resource and just move it into the hands of state managers without the appropriate amount of time it will take to design and implement a management structure for this new fishery is very short sighted. The Pollock resource is a large and important part of the Gulf of Alaska groundfish fisheries. It must be managed carefully and not at the whim of some individual making this proposal.

The historic pollock harvesters have developed long-term business and harvesting plans in conjunction with processors, their workers and the vendors and service industries that support the Pollock fishery. Removing access of 25% of the Pollock resource from these historic harvesters will have a significant economic ripple effect on all those who depend on this fishery.

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This proposal calls for the use of non-pelagic (bottom) trawl gear as well as pelagic trawl, seine and jig gear. State waters are currently closed to bottom trawling.

This proposal is couched as providing opportunities for little guys but Pollock fishing is a high overhead, very narrow margin fishery. It costs several million dollars to procure the necessary permits and build a vessel capable of participating in this fishery. The new Super 58' vessels being built are far from being little boats with 800-1000 horsepower, the ability to pack up to 250,000 pounds of Pollock and costing \$2.5 - \$3 Million Dollars.

This proposal calls for 100% observer coverage in all of these new fisheries inside of state waters. This would require the state to duplicate the federal observer program and somehow interface it with that program. The process of designing, developing the regulatory structure, implementing and managing this new observer requirement would be incredibly complex, expensive and impossible to do in any reasonable time frame. While you 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, implement and manage this program.

This proposal would not move 25% of the federal Pollock 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 that might be available inside 3 miles but it would remove access to the 35+ vessels that have historically prosecuted the Pollock fisheries. This is a direct reallocation of a fully subscribed Pollock fishery.

This proposal was submitted by an under 58' vessel with minimal history in the Gulf of Alaska and it is aimed at taking away fishing opportunities of historic participants for their own advantage.

This proposal should be eliminated!

Sincerely,



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