



RC 064

Alaska Department of Fish and Game  
Board Support  
P. O. Box 115526  
Juneau, Alaska 99811



February 18, 2016

RE: Proposal 194, Closure of Unalaska Bay

Dear Board of Fisheries Members,

Please consider these comments from the members of United Catcher Boats. We ask that you **do not support** Proposal 194, the complete closure of Unalaska Bay to trawling for Pollock. Adoption of Proposal 194 would unfairly impact the catcher vessel trawl fleet by further closing Unalaska Bay to Pollock fishing and thereby reduce our fishing opportunities. The Board of Fisheries has acted on this same proposal now twice, once at your February 2010 meeting (Proposal 111), and again at your February 2013 meeting (Proposal 162). The compromise action (on Proposal 111) adopted by the Alaska Board of Fisheries six years ago in February 2010 and again in at your February 2013 meeting was reasonable and addressed the concerns raised by subsistence, sport, and non-trawl harvesters. We believe the Board of fisheries' action in 2010 created a 'win-win' solution for both the local pollock trawl fleet and the local recreational and subsistence users, and no additional closures are needed in Unalaska Bay. We ask the Board to continue its support of the February 2010 compromise, and take no further action.

The compromise action adopted provides a closure of the entire Unalaska Bay for at a minimum of 10 months out of the year, from November 1 through August 31. Pollock fishing is allowed only in the outer portion of Unalaska Bay (outside of a line drawn between Priest Rock and Broad Bay) from September 1 until the closure of the federal Inshore Pollock fishery, or October 31. As the Pollock B season fishery typically ends around the end of September, the pollock catcher vessel fleet harvests pollock in the outer portion of Unalaska Bay for about one month out of the year. Again, the Pollock fleet is prohibited from fishing in the inner portion of Unalaska Bay at all times of the year. UCB supported this compromise as did the representatives of the Unalaska community, and the Board of Fisheries passed the compromise on a unanimous vote. The Dutch Harbor ADF&G Advisory Panel, at their most recent meeting, unanimously reaffirmed their support for this compromise and does not support Proposal 194.

United Catcher Boats is a trawl catcher vessel trade association made up of the owners of 68 vessels that participate in the Bering Sea/Aleutian Islands (BSAI) trawl fisheries. Our members fish for Pollock

and Pacific Cod in the BSAI trawl fishery and are primarily home-ported out of Dutch Harbor and Akutan. We deliver our catch to the plants in Dutch Harbor (UniSea, Westward Seafoods and Alyeska Seafoods), Akutan (Trident Seafoods), Beaver Inlet (Icicle Seafoods), and King Cove (Peter Pan Seafoods), as well as to three offshore Pollock Mothership markets. The closure of Unalaska Bay to trawling for Pollock would have a negative impact on our fishing opportunities.

Upon review of the stated reasons presented in Proposal 194, we offer the following comments for your consideration. We fail to see any real or definable reason for the Board of Fisheries to enact a year round closure to the entire Unalaska Bay. The proposers provide no evidence that the harvest of pollock in the outer portion of Unalaska Bay negatively impacts other living resources in the Bay and no evidence that there are negative impacts to the subsistence and recreational harvests of salmon, crab and halibut by local Dutch Harbor residents.

**Salmon Bycatch:** The Bering Sea Pollock fleet has worked very hard addressing the issue of salmon bycatch. Since 2010 the fleet operates under a Chinook Salmon Savings Incentive Plan (SSIP) that was developed with the NPFMC's Chinook salmon hard cap management program for the BSAI Pollock fleet. Each catcher vessel is limited to a share of the Chinook hard cap and through the SIPP they have incentives to avoid or reduce unwanted harvest of Chinook salmon. This program has proven to be a success.

Relative to salmon harvest within Unalaska Bay, the following table (source: SeaState, Inc., using Federal observer data) provides the number of Chinook and chum salmon taken as bycatch by the Pollock fleet since the 2010 Board of Fisheries compromise went into effect. Note that every vessel fishing Pollock is required to carry a federal observer 100% of the time so the data presented represents observed catches.

<u>Year</u>	<u>Deliveries</u>	<u>Pollock (mt)</u>	<u>Chinook (number)</u>	<u>Chum (number)</u>
2012	8	443	100	742
2011	16	1061	17	173
2010	18	1752	12	581

The Pollock fleet also uses a Rolling Hot Spot Closure program for both Chinook and chum salmon to help reduce and manage bycatch. This federal regulation allows the Pollock co-op managers to close, on a weekly basis, discrete areas with known high bycatch rates ("hotspots"). Over the past couple of years this bycatch management tool has become quite effective in reducing salmon bycatch in the Bering Sea Pollock fishery. If salmon bycatch rates in the Unalaska Bay fishery are shown to be above average, then the co-op managers designate this area as a "Hotspot" and close it to vessels that have high bycatch rates, on a weekly basis. Since 2010 the Pollock coops have implemented three closures in Unalaska Bay under the Hotspot Closure program as follows: Aug. 10-20, 2010; non closures in 2011; Aug. 7-14, 2012; and Sept. 14-18, 2012. These closures were voluntary and were above and beyond what was adopted by the Board of Fisheries in 2010.

The closure of Unalaska Bay as proposed in Proposal 194 will result in extending the pollock fishery later into the season. Extending the season concerns us because Chinook appear in greater numbers on the Pollock grounds as the year progresses into the fall months, thereby increasing the chances for higher bycatch rates. A situation we clearly want to avoid. Closure of the Bay will also have the effect of forcing the pollock fleet to not be able to fish in all possible areas of known low salmon bycatch

encounters. The fleet will not fish in the Bay if they experience high salmon bycatch rates but might choose to fish in the Bay if the salmon bycatch rates are low.

In addition, the pollock fleet encounters only Chinook and chum salmon, not sockeye, pink or silver salmon, the species of importance for the sport and subsistence users of Unalaska Bay. The two anadromous rivers that flow into Unalaska Bay are sockeye, silver and pink producing rivers.

**Habitat Impacts** Benthic habitat destruction is not occurring in Unalaska Bay by the pollock catcher vessels using mid-water trawls to harvest Pollock. Due to the rough and high relief bottom substrate, the Pollock fishery in Unalaska Bay is a true pelagic fishery. There is a huge disincentive to have a net come in contact with the seafloor where there are many rough hazards that can damage and destroy the nets, particularly in the area in question. The average price of a Pollock mid-water net is over \$100,000.

**Loss of Local Halibut Catch** Supporters of Proposal 194 state that the reduction in the catch of halibut by the local sport and subsistence users is a result of the trawl activity by the Pollock fleet. There is no documented evidence or proof that the vessels fishing for Pollock in Unalaska Bay have had any impact on the halibut population in Unalaska Bay. ADF&G data show little to no halibut taken as bycatch in the Pollock fishery.

**Gear Conflicts and Vessel Safety** There is no data or any documented report of pot or longline gear loss due to Pollock fishing occurring in Unalaska Bay. Normally, when a trawl net comes in contact with a crab pot, there is a complaint filed with the ADF&G or NMFS offices in Dutch Harbor. Over the past decade, the Bering Sea Pollock trawl and pot fleets have worked together to develop a protocol agreement that has successfully minimized gear and grounds conflicts. Given the thousands of vessel trips that enter and exit Dutch Harbor by the groundfish trawl, pot and longline vessels throughout the year, it is hard to believe that any loss of hook & line and pot gear is due to the few Pollock vessels fishing in the Bay in the late summer months. There also is no evidence that the Pollock trawlers fishing in the outer portion of Unalaska in the month of September have caused the smaller boats to be forced out of the protective waters of the Bay and to areas that are unsafe. Again, we cannot fish in the summer months when the local boats are participating in their subsistence and sport fishing, and we do not fish in the inner portion of the Bay.

**Continued Influx of Large Trawlers** The trawl vessels harvesting Pollock in Unalaska Bay are the smaller sized vessels (relative to the entire Bering Sea Pollock catcher vessel fleet). The size and shape of the fishing area in Unalaska Bay is better suited for these smaller-size vessels (105' to 125' in length).

We are very concerned about the cumulative loss of fishing grounds over time. Over the past twenty years, the BSAI trawl fleet has seen a continuum of time and area closures to fishing in the form to Stellar Sea Lion Critical Habitat, Essential Fish Habitat (EFH), Habitat Areas of Particular Concern (HAPC), and ecosystem management measures. It is our belief that the rationale for the closure in Proposal 194 is without merit. We believe trawling for Pollock, as it is currently allowed in Unalaska Bay, should be permitted to continue.

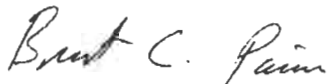
We cannot simply make up for this loss of area by fishing somewhere else. Unalaska Bay provides fishermen and processing plants the size and quality of fish that are optimal for fillet product forms rather than surimi product forms. They also have a significantly less run time back to the processing plant from the fishing grounds thereby increasing product quality.

In addition, the waters of Unalaska Bay provide a safe area to operate for the smaller Bering Sea Pollock fleet. At times of very severe weather conditions the smaller vessels cannot venture out onto the Eastern Bering Sea Shelf.

If the Board of Fisheries is interested in taking measures to protect the waters and fishery resources of Unalaska Bay, we ask that you request the ADF&G provide you with data that show the current amount of removals of salmon and groundfish by all users of the Bay (sport, subsistence and commercial) in order to develop a baseline trend. We also ask you direct ADF&G to initiate habitat impact studies to determine impacts to the Unalaska Bay habitat, and if so, the possible causes of this impact.

In summary, we ask for your continued support of the compromise action adopted in 2010, reaffirmed in 2013, and take no action on Proposal 194.

Sincerely,

A handwritten signature in cursive script that reads "Brent C. Paine".

Brent Paine  
Executive Director  
United Catcher Boats