



Alaska Whitefish Trawlers Association

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Alaska Board of Fisheries
Statewide Finfish Meeting
Anchorage, Alaska
3/8-3/11/2016

RC 029

Proposal 215 Oppose

Dear Chairman Kluberton:

The Alaska Whitefish Trawlers Association (AWTA) is located in Kodiak and represents independently owned trawl vessels that harvest groundfish in the Central Gulf of Alaska (CGOA), the Western Gulf of Alaska (WGOA) and Bering Sea (BS). A number of our vessels have endorsements for and participate in the Western Gulf of Alaska Pollock fishery. Under the current management structure these vessels regularly target Pollock both inside and outside of the 3-mile line.

Proposals 215

We oppose this proposal that would prohibit trawl vessels greater than 58' in length from participating in the Parallel Pollock fishery inside state waters in the South Alaska Peninsula Area.

- This proposal supposedly is aimed at keeping bycatch to a minimum. This is not the true intent behind this action but rather it is an attempt to create a private small boat fishery in the South Peninsula Area for a select group of fisherman. This is nothing more than a grab for fishing grounds and fish.
- Keeping bycatch to a minimum is extremely important for the entire fleet. All trawl vessels that fish Pollock in the WGOA operate under the same Chinook salmon hard cap regardless of the length of the vessel or whether the vessel fishes inside or outside 3 miles. If/when the Chinook salmon hard cap is exceeded in the WGOA, all Pollock fishing will stop for the remainder of the year for all trawl vessels. It is just common sense that all trawl vessels must be given the maximum opportunity to reduce Chinook bycatch.
- The present parallel fisheries management structure allows vessels to move back and forth across the 3-mile line in pursuit of the highest catch rates of Pollock or lowest Chinook salmon bycatch rates. If larger vessels are prevented from pursuing the highest concentrations of Pollock, which may occur inside 3 miles, they will have to make longer tows. When trawl nets are in the water for longer periods of time the potential for bycatch is increased. If this proposal is enacted higher, not lower, levels of bycatch will likely occur
- The larger trawl vessels have been working very hard at developing and incorporating excluder technologies in fishing gear and communicating regularly about hotspot bycatch events that may occur. Creating friction between the smaller and larger Pollock vessels makes it less likely that this excluder technology and hotspot information will be shared.
- The maker of this proposal states that the smaller vessels have shown that they can work together closely but it is very clear that there is a lot of divisiveness within the under 58' fleet in the WGOA. There is no guarantee that this action will foster any increase in cooperation that isn't already occurring. This proposal pits one group of fisherman against another and this kind of mindset will most likely continue to exist. The language in this proposal states that "It is

imperative that the vessels work together to insure that bycatch of both species is minimized.” This proposal has exactly the opposite effect.

- Our larger trawl vessels that participate in the South Alaska Peninsula Area Pollock fishery are owned, crewed and operated primarily by Alaskan residents. Preventing vessels larger than 58’ from participating in the Pollock fishery inside 3 miles amounts to taking fish away from one group of Alaskans and giving it to another group of Alaskans. Trying to determine which group of Alaskans is more worthy of harvesting these Pollock is very challenging and basic fairness and equitable treatment needs to be considered
- This action will create winners and losers and the only losers will be the vessels over 58’ in length. Regardless of which vessels harvest the Pollock inside 3 miles these fish will be hauled to the same communities and delivered to the same processors where the same workers will process them. The fuel, groceries and other supplies required to harvest these fish will be purchased from the same vendors regardless of the length of the vessels that catches them.
- We have been working hard and reaching out to trawl vessels in the WGOA to encourage communication and cooperation. Trawl vessels in both the CGOA and WGOA operate under the same hard caps for Halibut bycatch in our Pacific cod fishery and we have common interests in future fishery management strategies in the Gulf of Alaska. Purposely excluding a group of historic harvesters from fishing Pollock inside 3 miles is a slap in the face and it will create tension in the relationship between under and over 58’ vessels.
- All participants have made substantial investments in gear and technology to harvest Pollock while minimizing bycatch. Any regulatory measure that limits access to the resource will lead to excessive stranded capital for these fleets.
- This proposal will create regulations that will be very difficult, if not impossible to enforce. The State of Alaska does not have the money or fleet of enforcement vessels needed to insure that this state water regulation is enforced. Current federal VMS technology is used to track vessels operating in fisheries under federal control. The State of Alaska does not have this kind of technology to insure compliance with this proposed action
- In conjunction with the recent Pacific Marine EXPO in Seattle, AWTA hosted a meeting between CGOA and WGOA trawl harvesters. Twenty three harvesting vessels from the WGOA and CGOA trawl fisheries attended this meeting during which common goals and objectives were discussed. The purpose of this meeting was to foster and improve communication and discuss possible solutions to the multiple issues that face the entire Gulf of Alaska trawl fleet now and in the future. This proposal does exactly the opposite.

The established WGOA Pollock fishery is a critical component of the infrastructure of Gulf of Alaska fisheries. **This proposal 215 does more harm than good and should not be approved.**

Sincerely,



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