

United Catcher Boats
4005 20th Ave. West, Suite 116
Seattle, WA 98199

October 17, 2018
Alaska Board of Fisheries
ADF&G
P.O. Box 115526
Juneau, Alaska 99811

RE: UCB Comments to EBS and AI Is P. Cod Proposals

Dear Chairman Jensen and Members of the Alaska Board of Fisheries,

United Catcher Boats (UCB) is a vessel owner trade association that represents the interests of 70 trawl catcher vessels that are primarily home ported in Dutch Harbor and Akutan, Alaska. Our member vessels participate in the Eastern Bering Sea, Aleutian Islands and to a limited extent the Gulf of Alaska federal trawl fisheries. Some of the UCB members also participate in the Aleutian Islands State Water GHL fishery with trawl gear. The UCB vessel owners have participated in the federal Eastern Bering Sea and Aleutian Islands P. cod fishery since the late 1970's. Of the 70 vessels that are members of UCB, 18 are either wholly or partially owned by the Western Alaska CDQ organizations. Thank you for considering our comments on a number of the proposals before you at this meeting this week.

PROPOSAL 1: Repeal and replace the Aleutian Island Subdistrict Pacific Cod Management Plan with management measures found in the Dutch Harbor Subdistrict Pacific Cod Management Plan.

Oppose *The AI plan has been developed based on the fishing companies participating in the fishery, the local communities (primarily the City of Adak and the Aleut Corp.), and the processing companies (onshore and offshore). It has been developed to balance the interests of a variety of participants, including a mix of small boats, larger boats, and both fixed and trawl gear. It also has been developed with consideration of the participants in the federal Aleutian Islands federal P. cod fishery. We don't support disenfranchising trawl vessels from the AI GHL fishery in which they've participated since the Board of Fisheries first established the AI Is GHL fishery.*

PROPOSAL 2: Eliminate the 15-million-pound cap in the Aleutian Islands Subdistrict Pacific Cod Management Plan.

Oppose *We refer to the ADF&G Staff comments on Proposal 2. Eliminating the 15 million pound limit will result in an increased reallocation from the federal fishery and the potential for more stranded cod. There is currently a healthy balance between the state and federal cod fisheries in this region. The local community and local processor are dependant on both the state and federal fisheries. This proposal disrupts this balance.*

PROPOSALS 3 and 4: Adjust the AL GHL percentage based on processor availability; Stair step down the GHL.

Support *These two proposals help to ensure that P. cod is not “stranded” if there is no processor available in Adak. We refer to the ADF&G Staff comments on these two proposals.*

PROPOSAL 5: Increase the 2020 Aleutian Islands Subdistrict state-waters guideline harvest level if 2019 Pacific cod harvest by trawl catcher vessel participants in the federal Unrestricted Fishery diminishes access to the full Aleutian Islands Catcher Vessel Harvest Set-Aside.

Oppose *This action is not necessary given the current development/action by the NPFMC to solve an accounting problem (“loop hole”) in the federal Aleutian Islands management program at their October 2018 Council meeting (with final action scheduled for December 2018).*

Both ADF&G and NMFS comments on Proposal 5 identify points of concern. At this time, we encourage the BOF echo the hope that other sectors stand down in 2019, than to take any action on Proposal 5.

PROPOSAL 6: Limit fishing for Pacific cod in the Adak section of the Aleutian Islands Subdistrict to vessels 60 feet or less overall length and establish a guideline harvest level rollover provision.

Oppose *The Aleutian Islands state and federal fisheries are dependant on a well-balanced mix of smaller and larger trawl and fixed gear vessels. This proposal reallocates the value of the Aleutian Island state water cod fishery from trawl vessels with a history of participation and dependence and gives the value to relatively new participants. The Board has considered and rejected similar proposals in the past. The Adak shore plant and community needs deliveries from all trawl vessel to be viable. This proposal will harm the shore-based processor in Adak and also the Adak community.*

Currently, during some years, vessels less than 60’ can fish in the AIS state-waters season for up to two-and-a-half months before the over 60 feet vessels are eligible to participate.

PROPOSAL 9: Close the Dutch Harbor Subdistrict (DHS) to trawl gear when the DHS state waters P. cod season is open.

Oppose *The Bering Sea CV trawl fleet that participates in the federal Eastern Bering Sea trawl P. cod fishery primarily fish in waters outside of three miles. However, if the cod schools*

tend to be in shallower water there are times when the trawl fleet will make tows inside of three miles. Closing all waters inside of 3 miles throughout the Dutch Harbor Subdistrict is unnecessary and negatively impacts federal catcher vessel trawl participants without any gain to the pot vessels participating in the GHL fishery inside of three miles.

The characterizations made in this proposal are inaccurate. Trawl vessels do not use pot gear as "bait stations" or tow their gear in a circle. Trawl vessels make a concentrated effort to avoid pot gear while on the fishing grounds.

The Bering Sea trawl CV fleet has developed protocols with the federal fixed gear pot fleet fishing either crab or P. cod to reduce gear conflict on the grounds. Trawl CVs do not want to have entanglements with pot gear as this damages very expensive trawl gear.

The effect of this proposal will result in the trawl fishery having to fish for cod with lower catch rates and possibly higher bycatch rates of halibut.

PROPOSAL 12, 13 & 14: Increase the GHL percentage to 20, 10 or 8 Percent of the federal ABC; Expand the area eastward.

Oppose These three proposals result in major reallocations that reduce that amount of P. cod available to a significant number of participants in the federal fishery and transfer that cod to just a few under-60' pot vessels that have limited participation in the Eastern Bering Sea fishery.

Conditions have changed dramatically from three years ago when the Board of Fisheries increased the Area O fishery percentage to 6.4% of the federal ABC. At that time, there was a considerable buffer between the federal ABC and TAC and the argument was made by the under-60' pot vessel owners that the increase to 6.4% would not result in a reduction to the available harvests of the fixed and trawl gear vessels participating in the federal EBS cod fishery. Given that the North Pacific Council has now set the TAC equal to the ABC for EBS P. cod, this buffer no longer exists and any increase in the GHL fishery results in an equivalent reduction in the federal fishery.

The EBS P. Cod status of the stock is very uncertain. There is a significant downward trend in both biomass (weight) and abundance (number of fish) over the past four years. In addition, federal stock assessment information indicates relatively poor recruitment of younger age classes of P. cod at present time that possibly will result in the continued downward trend in P. cod abundance and biomass.

With diminished data from the federal at-sea observer program and without a dock-side sampling program for the under-60' pot vessel fleet participating in the Area O GHL fishery, managers of this fishery will not have the needed biological information on P. cod harvest that is crucial for use in the annual stock assessment process conducted by the NOAA Fisheries Alaska Fisheries Science Center. This information is especially critical now when the status of the cod stock is uncertain and declining. When the scientific base of information is decreased, scientific

uncertainty increases and stock assessment scientists, Plan Team members, and SSC members are likely to recommend an increased buffer between the OFL and ABC for P.cod. This would result in a smaller overall BS ABC for everyone targeting P.cod regardless of sector or gear type. In this way, a percentage increase to the GHL may not actually result in a greater harvestable amount for the Area O fishery (as well as all participants).

Data on bycatch of non-target species is also very important for the management of species of concern like halibut and red king crab. The North Pacific Council has spent countless years developing bycatch management programs for both fixed and trawl gear participants in the federal groundfish fisheries. These fixed and trawl gear P.cod fisheries operate under strict halibut and crab limits. Through dedicated on-the-grounds efforts, these sectors are able to come in significantly under their bycatch limits year after year. In contrast, a lack of any bycatch data and control measures in the Area O state waters fishery is a major concern.

In summary, now is not the time for an increase to the DHS GHL fishery. Given the uncertainties of the P. cod resource, we believe the Board of Fisheries has a conservation interest to not take any action to increase the harvest of the near shore GHL fishery at this time.

Thank you for your consideration of these comments.

Sincerely,

**Brent C. Paine,
Executive Director**