



Tending to our Future

Alaska Independent Tenderman's Association

P.O. Box 431, Petersburg, Alaska 99833

April 1, 2014

North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

RE: April Agenda Item C6 ~ Round Island Transit

Dear Council Members,

The Alaska Independent Tenderman's Association is a non-profit organization representing a diverse group of independent tender owners, operators and crewmen from Oregon to Alaska with vessels ranging from small wooden river scows to large steel crabbers. Our mission is to put forth one unified voice to the issues that affect tendering operations in Alaska.

After reviewing the Analysis for Proposed Amendment to the Fishery Management plan for Groundfish of the Bering Sea and Aleutian Islands Management area, the preliminary preferred alternative 2–option 1 and alternative 3 are the most flexible routes. The tender fleet should be able to work with this for the herring and salmon fisheries. AITA supports these alternatives.

In regard to management and enforcement considerations of this proposed amendment, it is stated that the existing Vessel Monitoring System should be sufficient to monitor the vessel activity. This might be true but I would like to submit for your consideration that there are tender vessels with a FFP that only tender and do not have an endorsement for Atka Mackerel, Pacific Cod or Pollock. Those vessels are not required to have a VMS onboard to tender a federal fishery, though they are all required to have an AIS aboard.

On the average it would cost the vessel about 8-10 % of its Togiak gross proceeds to purchase another identification system, which would only be used for tendering the Togiak Herring Fishery for no more than 25 days (not five (5) months as stated in the paper) and the Bristol Bay Salmon season which on the average would be a 25-30 day charter. Now the AIS system can be accessed 24 hours a day from any computer with a subscription to an AIS website. This would give the viewer access to all the tenders participating in the fishery not just those with FFP's. It seems to be more cost effective to use the AIS system for monitoring the activity in that area.

Thank you for taking the time to hearing our comments and concerns.

Respectfully yours,

A handwritten signature in blue ink that reads 'Lisa Terry'.

Lisa Terry
Executive Director
Alaska Independent Tenderman's Association

Comments to the North Pacific Fisheries Management Council

Agenda Item C-2

December 2013 Meeting

By: Frank Logusak, Togiak Traditional Council, Qayassiq Walrus Commission

Hello. Thank you for the opportunity to speak today. My name is Frank Logusak and I am Chief of Togiak Traditional Council and Chairman of the Qayassiq Walrus Commission. I have been on the Tribal Council for almost 40 years and I have been hunting and fishing in the waters of Bristol Bay my whole life.

To those of us who survive off these waters and have for thousands of years, how this issue is resolved may affect our ability to subsistence hunt and fish. I have looked at the paper prepared by Steve MacLean on this issue, and I have spoken with him myself, and I am concerned that some people are focusing too much on convenience and cost-savings for commercial fishermen. There are larger issues here. We must protect the walrus. Therefore, I and the Qayassiq Walrus Commission support Alternative 2, Option 3.

Let me explain why I think Option 3 is the best one and the only one we can support. The first reason we support it is that it retains a buffer of 6 nautical miles off of Round Island, which is the largest of the options. Even this we think might

be too close. As you know, the impact of the fishery on walrus has been discussed several times before and I would like to point out that each time this issue has been considered, the Council has heard evidence that noise disturbs the walrus. In the November 2009 report prepared by Bill Wilson and Diana Evans, on page 7 there is a statement that there was “apparent correlation between increased noise and observed declines and numbers of walrus using haulouts in northern Bristol Bay.” NOAA had a meeting in April 2011 where they presented a PowerPoint presentation called “Airborne Noise Issues from the Perspective of the marine Mammal Protection Act.” This PowerPoint described how aircraft noise caused stampedes leading to deaths, abandonment of haulouts, changes in migration and dive patterns, and gave an overview of ways to minimize impacts of airborne sound. The research that has been done proves what those of us who live there have been saying all along: walrus are disturbed by the noise. We have the same issues with spotter flights over Bristol Bay. My point is that walrus are very sensitive to noise – stampedes can be caused just by the presence of a few Stellar sea lion barking – and you are already proposing to cut their buffer zone from 12 to 6 miles. You do not know the impact of doing this yet. Mr. MacLean’s paper says the impact on walrus should be “insignificant” but he is talking there only about direct strikes, or vessels hitting walrus in the water. That is clearly not the main disturbance here – the main disturbance is the noise of the increased traffic and just

the physical presence of more boats. We ask that you tread lightly and choose the option that leaves the walrus the best buffer zone possible *unless and until you know for sure* that a smaller buffer will not disturb them. So we are asking for option 3, and we would also like to request some research into the impact of the increased noise on the walrus.

I also would like to explain why we do not like the Alternative 1, the “no action” alternative. Currently, the boats with federal fisheries permits go around Round and Hagermeister Island, up through Hagermeister Strait and into Togiak Bay. That route takes them right by a walrus haulout on the southern end of Hagermeister Island and right through the water fowl migration in Hagermeister Strait. Walrus also used to Hagermeister Strait. This current route also goes through our commercial longlining area to the east and south of Hagermeister. In other words, the current route also impacts walrus as well as water fowl and the longlining fishery. So we think this new proposal would help alleviate those problems too.

I know some people will advocate for a wider corridor just because it is wider. Some will argue that wider equals safer. This is not an argument because you can always argue more room is better and safer. The point is, do you *actually need* an extra three miles width in your corridor? Where is the evidence that this width is

truly necessary given the traffic? How do we know it improves safety? How do you decide that this width outweighs the impact on the walrus? These questions should be answered before a decision to accept a wider corridor.

In considering this change, you are making an important decision that certainly will affect the walrus. We strongly urge you to be very careful and make the decision with the least impact on them unless and until you know the noise will not disturb them and cause a violation of the Marine Mammal Protection Act.

Thank you for your time.