



## Alaska Whitefish Trawlers Association

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November 29, 2017

North Pacific Fishery Management Council  
605 West 4<sup>th</sup>, Suite 306  
Anchorage, Alaska 99501-2252

*Submitted electronically to: [npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)*

Re: Agenda Item D4 – Stranded GOA Pacific Cod TAC in the Trawl B Season

Alaska Whitefish Trawler Association (AWTA) is a Kodiak-based trade organization representing independently owned trawl catcher-vessels fishing in the Gulf of Alaska and Bering Sea. Most AWTA vessels home port in Kodiak and deliver groundfish to Kodiak 11 months out of the year, and the majority of AWTA crews and skippers reside in Kodiak. Kodiak is ranked the #4 port in the nation by volume, and groundfish deliveries by trawl vessels represent 60% of all fish across Kodiak's docks annually.

The Council asked for a discussion paper describing the stranding of Pacific cod TAC in the B season in the GOA trawl fishery. The resulting paper does not demonstrate that Pacific cod TAC is being stranded, and in fact, clearly describes existing regulatory mechanisms that allow in-season reallocation of TAC between sectors specifically to avoid stranding TAC. The discussion paper further highlights that cod harvest across all sectors has been very low in 2017, correlating with recent and unexpected survey results that underlie an anticipated TAC reduction of 70%-80% (that is likely to persist for the next several years).

AWTA recommends that the Council take no further action on this issue for several reasons. (1) in-season management tools exist to move TAC between sectors and are effectively utilized by the agency to avoid stranding TAC; (2) as outlined in the discussion paper sector allocations will be formally reviewed in 2020; (3) significant reductions in Pacific cod TAC likely render this issue moot for the next 3-5 years.

Thank you for your consideration and the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Rebecca Skinner".

Rebecca Skinner, Executive Director  
Alaska Whitefish Trawlers Association