



Alaska State Legislature

Representative Sarah Vance

House District 6

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David Witherell
Executive Director
Council Administration
North Pacific Fishery Management Council
1007 West 3rd Ave., Suite 400
L92 Building, 4th floor
Anchorage, Alaska 99501

TRANSMIT VIA ONLINE PORTAL

Dear North Pacific Fishery Management Council Members,

As a representative of Alaska's coastal communities, including many hardworking crab fishermen who rely on a healthy and balanced ecosystem, I am writing to express grave concerns regarding Agenda Item C6: Pelagic Trawl Gear Definition. The well-being of these communities depends directly on the sustainable management of our marine resources, particularly critical species like crab and halibut.

The ongoing bycatch resulting from the use of non-pelagic trawl gear in bottomfish fisheries threatens to disrupt this balance. King and Tanner crab populations in several regions of Alaska are already experiencing alarming declines. Further human-induced mortality from bycatch could severely hinder their recovery and jeopardize the livelihoods of the fishermen who depend on these stocks. Similarly, while halibut populations are currently stable, they are fully allocated to directed fisheries. Any additional exploitation through non-directed harvests could push these populations beyond sustainable limits, jeopardizing long-term fishing opportunities.

Evidence shows that non-pelagic trawl gear can cause significant mortalities of these non-target species. Many fisheries using this gear incidentally capture large amounts of prohibited finfish and shellfish, which cannot legally be retained. The mortality rates for these species, often killed or damaged beyond survival during the trawling process, are unacceptably high. Effective avoidance of prohibited species must be a priority if we are to conserve these essential resources for future generations.

I strongly urge the Council to take immediate action by adopting a clear and enforceable definition of pelagic trawl gear—one that ensures no part of the gear touches the seafloor during fishing operations. Pelagic trawling, by definition, should occur entirely within the water column, with no contact with the seabed. The Council's definition must align with Alaska's regulation as outlined in 5 AAC 39.105, which states:

"A pelagic trawl is a trawl where the net, or the trawl doors or other trawl-spreading device, do not operate in contact with the seabed, and which does not have attached to it any protective device, such as chafing gear, rollers, or bobbins, that would make it suitable for fishing in contact with the seabed."

The data from the National Marine Fisheries Service indicates that many so-called pelagic trawl vessels, particularly larger factory vessels, make bottom contact nearly 100% of the time, while smaller vessels do so up to 60% of the time. This bottom contact results in severe environmental damage, including the destruction of vulnerable crab populations, corals, and other critical benthic habitats.

Failure to establish a clear and enforceable definition of pelagic trawl gear will not only undermine the Council's role as stewards of our fisheries but also exacerbate the damage to the Bering Sea and Gulf of Alaska's sensitive ecosystems. These are resources on which Alaska's coastal communities—and future generations of fishermen—depend.

I respectfully urge the Council to act decisively by defining pelagic trawl gear in a way that protects Alaska's marine ecosystems, ensuring that no part of the trawl gear makes contact with the seafloor. The future of Alaska's fisheries and coastal communities depends on this critical action.

Thank you for your attention to this urgent matter.

Respectfully,



Representative Sarah Vance

Chair, Judiciary Committee

Chair, Fisheries Committee

Ex-Officio Board Member, Alaska Seafood Marketing Institute

Advisor, Pacific States Marine Fisheries Commission Advisory Committee