

Peninsula Fishermen's Coalition

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Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue
Anchorage, Alaska 99801

October 10, 2014

In Re: Agenda Item C7 Western Gulf Trawl Bycatch Management

Dear Chairman Hull and Members of the Council:

Thank you for the opportunity to provide comment on this agenda item. The members of the Peninsula Fishermen's Coalition appreciate the Council's outreach efforts. The meetings with Sam Cunningham and Nicole Smith were well attended and greatly appreciated. We look forward to continue working with the Council and State of Alaska as this process goes forward.

We have continued to work through the issues and want to reassure the Council that although our members have concerns, the group still believes that as part of the GOA Groundfish Community, we must be included in any comprehensive plan to manage our fisheries.

Individual PFC members have undoubtedly expressed frustration during conversations with each other and with AEB employees. However, during PFC meetings, the bottom line is always, "We can't be the only fleet outside this process." We will continue to look for some variations in the overall plan that will address the things that set our fleet apart from the larger vessels in the GOA groundfish fisheries.

To underscore this position, PFC's President Kiley Thompson left his vessel tied up to be here to address the Council.

Beth Stewart attended the recent Board of Fisheries workgroup meeting held earlier this week and we have had a chance to review that group's work. PFC believes that this effort has made a lot of progress in addressing the problems that arise when trying to manage fisheries that cross legal jurisdictions. We believe that the disincentives that the State of Alaska has offered for the Board of Fisheries to consider may be adequate.

Our only objection is the suggestion that the Board of Fisheries should close the two small areas that remain open to nonpelagic trawling inside state waters. Although recent catches in these areas are reported to be quite small, the Sanak area provides a safe area for hauling back in poor weather and the Kupreanof area has been and will again be an area of low halibut bycatch with abundant P. cod. We agree that all trawl catch in these areas should be counted against the Federal ACL and should be opened and closed in the same way that all other parallel waters are opened and closed.

We believe that the comments submitted by the group that includes Alaska Groundfish Data Bank, Alaska Whitefish Trawlers Association, Groundfish Forum, Pacific Seafood Processors Association, Mid-water Trawlers Cooperative and United Catcher Vessels provide a good variety of elements and options whenever the Council is ready to put a proposal out for public review.

If this is the appropriate time to bring forward elements and options for analysis, we have two additional suggestions.

Allocated Species: The WGOA shore based trawlers currently have no market for rockfish or flatfish. However, if one or both of the shore plants expands its processing capacity in response to market demands, we would clearly like to be able to participate in those fisheries. We ask that Council consider analyzing the following alternative:

WGOA Rockfish and Flat Fish Adaptive Management Plan:

Establish a 2%, 3% or 5% quota pool of the requested species. This reallocation would come from the CP sector.

A cooperative and its associated processor must notify the NPFMC of its desire and proven capacity at least 12 months in advance of the season. The cooperative must submit a plan that specifies a management plan that accounts for any associated bycatch of any prohibited species and any allocated species. The council may then release the AMP reserved quota to that cooperative.

If no such plan is submitted the AMP reserved quota rolls into the pool available to the CP sector.

Skipper Shares: Keeping the current small boat fleet healthy provides real opportunities for bringing new entrants into these fisheries. This is why we proposed a "Skipper Share" component in our first set of comments. This is still our preferred method of creating a path for new entrants. We ask that this element be included in any set of elements and options. We are suggesting this element for WGOA CVs only, because we don't know whether this option makes sense for the CGOA.

Skipper Allocations: Skippers, as verified by contracts with vessel owners and fish tickets, shall receive:

- Option 1: 5%
- Option 2: 10%
- Option 3: 25%

of the allocation to a cooperative. The skipper must be onboard the vessel on which such allocations are part of the mix.

Such shares are subject to all transfer restrictions.

We believe that such a program will provide incentive for those who wish to work their way up to vessel ownership.

Community Fishing Associations:

The Peninsula Fishermen's Coalition remains strongly opposed to CFAs. The expenses association with implementing the Trawl Bycatch Management Plan will be high and may be extremely burdensome. The step up to 100% observer coverage, the recovery fee, the cost of hiring a quota manager and the technology to communicate individual catch progress come on

top of local and state raw fish taxes and other current fixed costs. If the vessels owned and operated by PFC members are unable to make a profit, larger vessels will take over. This means a loss of skipper and crew jobs for 19 vessels, 16 of whom are PFC members. That's approximately 90 excellent jobs that cannot be recreated in Sand Point or King Cove.

Taking another 10-20% off the top of the ACL and forcing the skippers, crew and boat owners to lease it back from a brand new bureaucracy is senseless. Trawling is not an entry level fishery. It is one of the most expensive fisheries and certainly one of the most technically complex fisheries out there.

Sincerely,

Beth Stewart, Executive Director
Peninsula Fishermen's Coalition

Kiley Thompson, President (F/V Decision)	Steven Galovin (F/V Shawna Rae)
A.J. Newman, (F/V Lady Lee Dawn)	Art Holmberg (F/V Tern)
Ben Ley, Treasurer (F/V Alaskan Lady)	Melvin Larsen (F/V Temptation)
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