

Page 1

Public Testimony Sign-Up Sheet

Agenda Item C-4(b) GOA Pacific cod sector split

	NAME (PLEASE PRINT)	AFFILIATION
1	Bert Ashley	F/V Gold Rush
2	Yakov Redkov	K-Bay Fisheries Assoc.
3	Leonard Carpenter	F/V Fish Tale
4	Scott Hansen	FV Beauty Bay
5	ALEXUS KWACHIA	GGFA
6	TERRY HAINES	FISH HEADS
7	Parius Kognzak	F/V Malba
8	Paul Gronholdt	F/V ST. FRANCIS
9	Mike Delaney	Alaskan Leader Fisheries
10	John McCarthy	Pacific Star
11	Don Hees	F/V Progress
12	Frankie Brown	F/V Vanguard
13	Vern Hill	Progress + Vanguard
14	Curt Waters	FV Mar Del Norte
15	Tom Evich	F/V Haven Evich
16	Julie Kavanaugh	F/V Sylvia Star
17	MARIE CHANDLER	F/V TOPAZ
18	JASON CHANDLER	
19	Kiva McCarthy	F/V Stella
20	Bob Krueger	F/V Mar Del Norte
21	Wing BISHBEE	F/V Mar Pacifico
22	Kenny Down	Fischer Longline Coalition
23	XXXXXXXXXX	XXXXXXXXXX
24	Kurt Cochran	F/V NEW LIFE
25	Julie Benny	AGDB

Together

TOGETHER

NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

Page 1

Call for me for help

EV Beauty Bay
GAPA
FISH HEADS

EV Beauty Bay
GAPA
FISH HEADS

EV Mar Del Norte
EV Town
EV Sylvia Star

EV Mar Del Norte
EV Town
EV Sylvia Star

EV Beauty Bay
GAPA
FISH HEADS

EV Beauty Bay
GAPA
FISH HEADS

EV Mar Del Norte
EV Town
EV Sylvia Star

EV Mar Del Norte
EV Town
EV Sylvia Star



Page 2

Public Testimony Sign-Up Sheet

Agenda Item

C-4 (b) GOA Pcod Sector split

	NAME (PLEASE PRINT)	AFFILIATION
1	Jeremie Pitus	
2	Jeff Stephan	UFMA
3	Jelly Bohgen	
4	Chris Holland	F/V Point Ouzga
5	Mike Affier	UGOAF
6	Jay Stenson	ADA
7	AL BURCH	AWTA Alaska Whitefish Trawlers Assn
8	JEFF SCOTT	
9	DENNIS EGGERS	
10	KEITH REYNOLDS	
11	Joe Childers	Western GOA Fisheries Assoc
12	Chuck McCallum	Lake & Pen Bor.
13	Freddie Christiansen	
14		
15		
16	Tony Gilgiovio	Critique Longmire Village
17	Storian	F/V Middle Tuni
18	LORI SWANSON	GROUND FISH FORUM
19	Phonda Macken	Business - Treasury
20	Theresa Peterson	Amcc
21	Steve Branson	Crewmembers Association
22	Walter Sargent	F/V Major
23		
24		
25		

NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Chris Oliver ^{DO for}
Executive Director

DATE: May 27, 2008

SUBJECT: GOA Pacific Cod Sector Allocations

ESTIMATED TIME 8 HOURS (both C-4 items)

ACTION REQUIRED

Initial Review of GOA Pacific cod sector allocations analysis (EA/RIR/IRFA)

BACKGROUND

(b) Gulf of Alaska Pacific Cod Sector Allocations.

In October 2007, the Council reviewed a preliminary draft analysis (EA/RIR/IRFA) for the proposed Gulf of Alaska Pacific cod sector allocations. At that time, the Council requested that staff provide additional information on incidental catch of Pacific cod (including discards) and the State waters Pacific cod fisheries. At its December 2007 meeting, the Council reviewed a discussion paper that addressed these issues, and revised the components and options for analysis. Specifically, the Council's revisions to the motion included:

1. Options to revise management of the GOA Pacific cod jig fisheries were added under Component 5. A letter from NMFS addressing legal issues related to delegating management authority for the GOA Pacific cod jig fisheries in federal waters to the State of Alaska is attached as Item C-4(b)(2).
2. Options to allocate the hook-and-line apportionment of halibut PSC to the catcher vessel and catcher processor sectors were added under Component 7.
3. A provision deferring management of incidental catch to NMFS inseason management was added to Component 3.
4. Options to establish separate allocations based on vessel length were revised, and options to establish separate allocations for inshore catcher processors were removed from the motion.

The Council's motion also specifically requested that staff provide additional information on several issues:

- Diversification of revenues for vessels that participate in the GOA Pacific cod fisheries
- Potential effects of Pacific cod sector allocations on communities
- Potential interactions between Pacific cod sector allocations, the proposed fixed gear recency action, and the proposed revisions to the GOA sideboards

Initial review of the draft analysis is scheduled for this meeting. The analysis was mailed to the Council in mid-May, and the Executive Summary is attached as Item C-4(b)(1).

EXECUTIVE SUMMARY

This EA/RIR/IRFA examines the environmental, economic, and socioeconomic aspects of the proposed amendment to allocate the Western and Central Gulf of Alaska Pacific cod TACs to the various sectors. The proposed action would allocate the TACs to the hook-and-line catcher vessel, hook-and-line catcher processor, pot catcher vessel, pot catcher processor, trawl catcher vessel, trawl catcher processor, and jig sectors based on catch history or other criteria. The action would result in an amendment to the Gulf of Alaska Fisheries Management Plan (FMP).

The Gulf of Alaska Pacific cod resource is targeted by multiple gear and operation types, principally by pot, trawl, and hook-and-line catcher vessels and hook-and-line catcher processors. Smaller amounts of Pacific cod are harvested by other sectors, including catcher vessels using jig gear. Separate TACs are identified for Pacific cod in the Western, Central, and Eastern Gulf of Alaska management subareas, but the TACs are not divided among gear or operation types. This results in a derby-style race for fish and competition among the various gear types for shares of the TACs. To address these issues, the Council adopted the following Problem Statement in April 2007:

Gulf of Alaska Pacific Cod Sector Split Purpose and Need Statement

The limited access derby-style management of the Western Gulf and Central Gulf Pacific cod fisheries has led to competition among the various gear types (trawl, hook-and-line, pot, and jig) and operation types (catcher processor and catcher vessel) for shares of the total allowable catch (TAC). Competition for the GOA Pacific cod resource has increased for a variety of reasons, including increased market value of cod products, rationalization of other fisheries in the BSAI and GOA, increased participation by fishermen displaced from other fisheries, reduced federal TACs due to the state waters cod fishery, and Steller sea lion mitigation measures including the A/B seasonal split of the GOA Pacific cod TACs. The competition among sectors in the fishery may contribute to higher rates of bycatch, discards, and out-of-season incidental catch of Pacific cod.

Participants in the fisheries who have made long-term investments and are dependent on the fisheries face uncertainty as a result of the competition for catch shares among sectors. Allocation of the catch among sectors may reduce this uncertainty and contribute to stability across the sectors. Dividing the TACs among sectors may also facilitate development of management measures and fishing practices to address Steller sea lion mitigation measures, bycatch reduction, and prohibited species catch (PSC) mortality issues.

Alternatives, Components, and Options

There are two alternatives currently under consideration. **Alternative 1** is the status quo alternative. **Alternative 2** would allocate the Western and Central Gulf of Alaska Pacific cod TACs among the trawl, pot, hook-and-line, and jig catcher vessel and catcher processor sectors based on historic catch levels and other considerations, and includes the following components:

Component 1 identifies the management areas subject to the proposed action: the Western Gulf and Central Gulf. **Component 2** identifies the sectors subject to the proposed action. They include hook-and-line catcher processors, pot catcher processors, hook-and-line catcher vessels, pot catcher vessels, trawl catcher processors, trawl catcher vessels, and jig vessels. There are suboptions to establish separate allocations for the hook-and-line and trawl catcher processor sectors based on vessel length (<125 ft and ≥125 ft). There are also suboptions to establish separate allocations for the hook-and-line and pot catcher vessel sectors based on vessel length (<60 ft and ≥60 ft).

Component 3 identifies the two possible definitions of qualifying catch for the purpose of calculating sector allocations. Options include:

- Option 1 All retained legal catch of Pacific cod in the federal and parallel waters fisheries in the Western and Central Gulf of Alaska.
- Option 2 All retained Pacific cod harvested during the directed Pacific cod fisheries in the federal and parallel waters in the Western and Central Gulf.

Provisions applicable to both options:

- Catch will be calculated using Fish Tickets for catcher vessels and Catch Accounting/Blend data for catcher processors.
- Under all options, incidental catch allocated to trawl catcher vessels for the Central Gulf Rockfish program (currently, 2.09 percent of the Central Gulf Pacific cod TAC) will be deducted from the Central Gulf trawl catcher vessel allocation.
- In addition, all sector allocations will be managed to support incidental and directed catch needs.

Component 4 identifies the years included in catch history. There are 4 options:

- Option 1 Qualifying years 1995-2005: average of best 5 years
- Option 2 Qualifying years 1995-2005: average of best 7 years
- Option 3 Qualifying years 2000-2006: average of best 3 years
- Option 4 Qualifying years 2000-2006: average of best 5 years

Component 5 addresses the allocation to the jig sector. Options include setting aside 1, 3, 5, or 7 of the Western and Central GOA Pacific cod TACs for the jig vessel sector, with a stairstep provision to increase the jig allocation by 1, 2, or 3 percent if 90 percent of the federal jig allocation in an area is harvested in any given year. In addition, there is a step-down provision to reduce the jig allocation if it is not 90 percent harvested during three consecutive years, but the jig allocation would not fall below its initial level.

The Council also requested that staff work with the State of Alaska and NMFS to explore possible options for the jig fishery management structure (both federal and State) that create a workable fishery and minimize the amount of stranded quota. Possible solutions could include separate State and federal allocations (similar to status quo), or a State managed jig fishery, where the State would manage the jig allocation in federal waters, under delegated management authority from NMFS.

Component 6 addresses rollovers of unharvested allocations, and gives NMFS the discretion to determine when rollovers should occur. Options include rolling over unharvested catcher vessel and catcher processor allocations to other catcher vessel and catcher processor sectors, or to all sectors. Finally, **Component 7** identifies options for apportioning hook-and-line halibut PSC to catcher processors and catcher vessels. Halibut PSC could be apportioned in proportion to the total Western and Central GOA Pacific cod allocations to each sector, or another apportionment could be identified.

Range of Potential Sector Allocations

The range of potential percent sector allocations of the Western and Central GOA Pacific cod TACs are summarized in Tables E-1 and E-2. The qualification period that includes earlier years (1995-2005) generally favors the trawl catcher vessel sector, particularly in the Western Gulf. The qualification period that only includes more recent years (2000-2006) generally favors the pot catcher vessel sector, and, to a lesser extent, the hook-and-line sectors. Using each sector's best years reduces the disparities among the options somewhat, but there are still strong differences among the options, depending on the range of

qualifying years selected by the Council. For example, depending on which definition of qualifying catch is used, the trawl catcher vessel allocation could range from 30.2 to 47.2 percent of the Western Gulf TAC and 38.1 to 47.8 percent of the Central Gulf TAC. Similarly, the pot catcher vessel allocation could range from 27.3 to 42.0 percent of the Western Gulf TAC and 24.6 to 30.3 percent of the Central Gulf TAC.

Table E-1 Potential percent allocations of the Western and Central Gulf Pacific cod TACs

Western Gulf			HAL CP	HAL CV	Jig CV	POT CP	Pot CV	Trawl CV	TRW CP
	Period								
All cod	1995-2005	Best 7 years	19.8	0.6	0.5	2.2	27.3	47.1	2.5
	1995-2005	Best 5 years	18.5	0.7	0.5	2.5	30.0	45.4	2.4
	2000-2006	Best 5 years	21.7	0.6	0.7	2.3	40.5	31.8	2.6
	2000-2006	Best 3 years	21.4	0.8	0.8	2.7	41.4	30.2	2.7
Directed cod	1995-2005	Best 7 years	19.6	0.5	0.5	2.3	28.3	47.2	1.7
	1995-2005	Best 5 years	18.5	0.5	0.6	2.6	31.0	45.1	1.7
	2000-2006	Best 5 years	21.7	0.5	0.7	2.4	41.2	32.3	1.2
	2000-2006	Best 3 years	21.5	0.7	0.8	2.8	42.0	30.8	1.3

Central Gulf			HAL CP	HAL CV	Jig CV	POT CP	Pot CV	Trawl CV	TRW CP
	Period								
All cod	1995-2005	Best 7 years	2.8	17.2	0.2	2.1	24.6	47.8	5.3
	1995-2005	Best 5 years	3.4	17.5	0.2	2.0	25.3	45.9	5.6
	2000-2006	Best 5 years	4.2	20.7	0.3	1.2	25.2	44.0	4.4
	2000-2006	Best 3 years	4.7	19.4	0.4	1.4	27.9	41.8	4.4
Directed cod	1995-2005	Best 7 years	3.1	18.5	0.2	2.6	25.9	45.6	4.2
	1995-2005	Best 5 years	3.8	18.9	0.2	2.4	26.5	43.6	4.6
	2000-2006	Best 5 years	4.6	22.6	0.3	1.8	27.9	39.7	3.1
	2000-2006	Best 3 years	5.2	21.1	0.4	1.5	30.3	38.1	3.4

Table E-2 Potential percent allocations of the Western and Central Gulf Pacific cod TACs under suboptions to split sectors by vessel length (LOA)

Western Gulf			HAL CP <125	HAL CP ≥125	HAL CV <60	HAL CV ≥60	Jig CV	Pot CP	Pot CV <60	Pot CV ≥60	Trawl CV	Trawl CP <125	Trawl CP ≥125
	Period												
All cod	1995-2005	Best 7 years	16.5	3.7	0.4	0.2	0.5	2.2	13.5	13.7	46.6	1.3	1.5
	1995-2005	Best 5 years	15.6	3.8	0.5	0.2	0.5	2.5	14.3	15.5	44.3	1.2	1.6
	2000-2006	Best 5 years	17.5	4.6	0.6	0.0	0.6	2.2	18.5	22.4	31.1	1.4	1.2
	2000-2006	Best 3 years	17.7	4.9	0.7	0.0	0.8	2.6	19.4	22.2	29.0	1.3	1.3
Directed cod	1995-2005	Best 7 years	16.6	3.4	0.4	0.1	0.5	2.3	13.9	14.4	46.7	0.9	0.9
	1995-2005	Best 5 years	15.8	3.7	0.4	0.1	0.5	2.6	14.9	16.0	44.0	1.0	1.0
	2000-2006	Best 5 years	17.7	4.5	0.5	0.0	0.7	2.3	18.8	22.8	31.5	1.0	0.3
	2000-2006	Best 3 years	17.8	4.8	0.7	0.0	0.8	2.7	19.8	22.6	29.6	1.0	0.3

Central Gulf			HAL CP <125	HAL CP ≥125	HAL CV <60	HAL CV ≥60	Jig CV	Pot CP	Pot CV <60	Pot CV ≥60	Trawl CV	Trawl CP <125	Trawl CP ≥125
	Period												
All cod	1995-2005	Best 7 years	0.8	2.1	15.7	1.5	0.2	2.1	11.6	13.0	47.5	1.5	4.2
	1995-2005	Best 5 years	0.9	2.7	16.0	1.6	0.2	2.0	11.5	13.6	45.5	1.5	4.5
	2000-2006	Best 5 years	0.7	3.6	18.7	2.1	0.3	1.2	10.9	14.3	43.7	1.8	2.8
	2000-2006	Best 3 years	0.8	4.1	17.7	2.1	0.4	1.4	11.3	16.2	41.2	1.8	3.0
Directed cod	1995-2005	Best 7 years	0.8	2.7	16.9	1.5	0.2	2.5	12.1	13.7	45.1	0.9	3.6
	1995-2005	Best 5 years	0.9	3.0	17.3	1.6	0.2	2.3	12.0	14.3	43.2	1.0	4.0
	2000-2006	Best 5 years	0.7	4.0	20.5	2.2	0.3	1.8	12.1	15.8	39.5	1.0	2.2
	2000-2006	Best 3 years	0.8	4.6	19.4	2.2	0.4	1.5	12.3	17.6	37.6	1.0	2.6

Interactions with Fixed Gear Recency Action

In refining the alternatives and options for analysis, the Council may wish to consider interactions between the proposed GOA Pacific cod sector allocations and the GOA fixed gear recency action. A comparison of the components and options currently under consideration for the two actions is found Table E-3. The Council is considering options to add Pacific cod endorsements to fixed gear licenses to limit entry into the directed Pacific cod fisheries in the Western and Central Gulf of Alaska. Pacific cod endorsements could also restrict licenses to using the specific fixed gear type (e.g., pot or hook-and-line) and operation type (catcher processor or catcher vessel) specified on the endorsement. The pot, hook-and-line, and jig catcher vessel sectors could be subject to the endorsement requirement. Pot and hook-and-line catcher processors could also be subject to the Pacific cod endorsement requirement, and there is an option to create vessel length designations on hook-and-line catcher processor endorsements. The Council may wish to make the sector allocation definitions consistent with Pacific cod endorsement sector definitions to ensure that vessels that contributed catch history to the sector allocations have access to those allocations.

Other issues

An analysis of the alternatives, components, and options is included in Chapter 3 of this document. The analysis includes several new sections that the Council may wish to review at this meeting, including:

- Options for management of the jig sector allocations
- Options for allocating halibut PSC between hook-and-line catcher processors and catcher vessels
- A review of the current inshore/offshore processing component allocations, and potential interactions with the proposed sector allocations
- Options for establishing sector allocations based on vessel length
- Community impacts

Table E-3. A comparison of the components and options included in the proposed GOA sector allocations and GOA fixed gear recency actions.

COMPARISON OF GULF OF ALASKA ACTIONS		
ACTION	GOA Pacific Cod Sector Allocations	GOA Fixed Gear LLP Recency
PURPOSE OF ACTION	Allocate Western and Central Gulf Pacific cod TACs to the various sectors	(1) Remove latent fixed gear licenses with WG and/or CG endorsements from the groundfish fisheries (2) Add Pacific cod endorsements to licenses to limit entry to directed Pacific cod fisheries in GOA
MANAGEMENT AREAS	Western and Central Gulf of Alaska	Western and Central Gulf of Alaska (CG endorsement also includes West Yakutat)
SECTORS	(1) Hook-and-line CVs Suboption: Hook-and-line CVs <60 and ≥60 (2) Hook-and-line CPs Suboption: Hook-and-line CPs <125 and ≥125 (3) Pot CVs Suboption: Pot CVs <60 and ≥60 (4) Pot CPs (5) Jig (6) Trawl CVs (7) Trawl CPs Suboption: Trawl CPs <125 and ≥125	(1) Hook-and-line CVs (2) Hook-and-line CPs Suboption: Hook-and-line CPs <125 and ≥125 (3) Pot CVs (4) Pot CPs (5) Jig
CATCH DEFINITIONS	(1) All retained catch of Pacific cod from parallel and federal waters (2) Retained catch from the directed Pacific cod fisheries in parallel and federal waters State waters catch is excluded	(1) All retained catch of groundfish from parallel and federal waters (2) Retained catch from the directed Pacific cod fisheries in parallel and federal waters State waters catch is excluded IFQ catch is excluded
QUALIFYING YEARS	(1) 1995-2005: best 7 years (2) 1995-2005: best 5 years (3) 2000-2006: best 5 years (4) 2000-2006: best 3 years	(1) 2000-2005 (2) 2000-2006 (3) 2002-2005 (4) 2002-2006
LANDINGS THRESHOLDS	None	(1) 1, 3, or 5 landings during qualifying years (2) 5, 10, 25, or 100 mt during qualifying years
JIG	1, 3, 5, or 7 percent allocation Step up provision (1, 2, or 3 percent) if allocation is 90 percent harvested during a given year Step down provision if allocation is not 90 percent harvested during 3 consecutive years, but allocation will not drop below its initial level	(1) Exempt jig vessels from any LLP requirement (2) Exempt jig vessels from Pacific cod endorsement requirement
OTHER COMPONENTS	Options to allocate hook-and-line halibut PSC to CVs and CPs	Options to restrict licenses from using both fixed and trawl gear



AGENDA C-4(b)(2)
JUNE 2008

UNITED STATES DEPARTMENT OF
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

January 23, 2008

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

Dear Chairman Olson:

At its December 2007 meeting, the North Pacific Fishery Management Council requested that we provide guidance on legal considerations associated with State of Alaska (State) management of the Pacific cod jig gear fishery in Federal waters of the Gulf of Alaska (GOA). While a more specific proposal is required to fully assess legal, management, and policy considerations, we offer the following perspectives.

First, we assume the option under Council consideration would retain Pacific cod harvested by jig gear under management of the Council's Fishery Management Plan for Groundfish of the Gulf of Alaska (FMP). Given the widespread distribution of Pacific cod in the GOA, the importance of this resource to numerous Federal water fishery sectors, and Federal oversight of Steller sea lion protection measures associated with Pacific cod as a prey species, we do not believe legal justification exists to remove the jig gear fishery from the FMP. Thus, any State management in Federal waters would occur under delegated authority established in the FMP and not by removing the Pacific cod jig gear fishery and associated harvest from the FMP, as has been done for several rockfish species distributed primarily in State waters.

Second, any management authority delegated to the State under the FMP must be consistent with provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSA). Section 306(a)(3)(B) of the MSA allows for state management of a fishery in Federal waters provided such management is consistent with the FMP authorizing such delegation, the MSA, and other applicable law. The specific statute language is enclosed.

As with the existing delegated authority for management of crab in the Bering Sea/Aleutians and demersal shelf rockfish in the Southeast Outside District of the GOA, the State would need to identify management measures it believes would be necessary to manage the Federal water jig gear fishery and demonstrate consistency of those measures with the MSA. This constraint likely would prohibit the State's use of some management measures in Federal waters that it currently employs to manage State water fisheries, such as vessel size restrictions, exclusive registration areas, or other measures that would limit



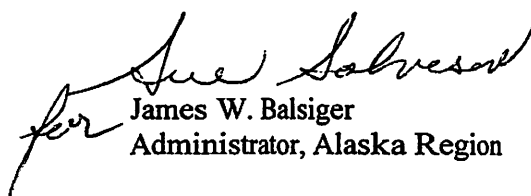
classes of vessels from participation in the Pacific cod jig gear fishery. Further, jig gear fishing for rockfish or other groundfish species could still occur under the FMP which creates complexity with respect to State management of incidental catch of Pacific cod by jig gear under a sector specific allocation.

Other management measures, such as exempting some or all jig gear vessels from Federal license limitation program requirements and the specification of a total allowable catch allocation to the jig gear sector must be developed by the Council and implemented by amendment to the FMP. Even under delegated management, Federal requirements necessary for the management and conservation of Federal water fisheries would continue to apply to jig gear vessels, such as the need for a Federal Fishing Permit and compliance with any relevant Steller sea lion protection measures such as season restrictions. Depending on the range of management measures delegated to the State, the FMP also may need to provide for Federal oversight of State management actions to ensure the fishery is managed consistent with the FMP, the MSA, and other applicable Federal law.

Finally, given the above considerations, the Council and the State of Alaska may wish to consider an alternative that would allow for Federal management of the jig gear fishery in State and Federal waters under a single TAC allocation which could remove the need for a separate State managed guideline harvest level for jig gear. An option to exempt some or all jig gear vessels from LLP requirements could be considered. We note that an increased harvest of Pacific cod in a new open access jig gear fishery could create additional management challenges under either Federal or State management authority that would need to be assessed in the analysis.

We would be pleased to offer additional guidance and perspective as the Council continues to refine its analysis of alternatives for management of Pacific cod sector allocations.

Sincerely,


James W. Balsiger
Administrator, Alaska Region

Enclosure

Magnuson-Stevens Fishery Conservation and Management Act

SEC. 306. STATE JURISDICTION 16 U.S.C. 1856

(3) A State may regulate a fishing vessel outside the boundaries of the State in the following circumstances:

(A) The fishing vessel is registered under the law of that State, and (i) there is no fishery management plan or other applicable Federal fishing regulations for the fishery in which the vessel is operating; or (ii) the State's laws and regulations are consistent with the fishery management plan and applicable Federal fishing regulations for the fishery in which the vessel is operating.

(B) The fishery management plan for the fishery in which the fishing vessel is operating delegates management of the fishery to a State and the State's laws and regulations are consistent with such fishery management plan. If at any time the Secretary determines that a State law or regulation applicable to a fishing vessel under this circumstance is not consistent with the fishery management plan, the Secretary shall promptly notify the State and the appropriate Council of such determination and provide an opportunity for the State to correct any inconsistencies identified in the notification. If, after notice and opportunity for corrective action, the State does not correct the inconsistencies identified by the Secretary, the authority granted to the State under this subparagraph shall not apply until the Secretary and the appropriate Council find that the State has corrected the inconsistencies. For a fishery for which there was a fishery management plan in place on August 1, 1996 that did not delegate management of the fishery to a State as of that date, the authority provided by this subparagraph applies only if the Council approves the delegation of management of the fishery to the State by a three-quarters majority vote of the voting members of the Council.

(C) The fishing vessel is not registered under the law of the State of Alaska and is operating in a fishery in the exclusive economic zone off Alaska for which there was no fishery management plan in place on August 1, 1996, and the Secretary and the North Pacific Council find that there is a legitimate interest of the State of Alaska in the conservation and management of such fishery. The authority provided under this subparagraph shall terminate when a fishery management plan under this Act is approved and implemented for such fishery.

Operating as a trawl fisherman in the central gulf is unique in many ways. As members of the fishing community here in Kodiak, more processing jobs are supported by the millions of pounds of groundfish delivered exclusively into Kodiak by trawlers than any of the other harvesters. More money is spent locally on support services by trawlers due to the complex nature of trawl equipment and gear. The consistency of deliveries throughout the year support the hundreds of plant employees month to month. All other fisheries are of a much more seasonal schedule. Yet as a group trawlers are regarded with contempt and hostility by many.

My history as a fisherman in Kodiak goes back over 25 years. As I look back searching for answers why, a few things are pretty clear. While so many fisheries have suffered market problems and stock collapses, Trawling has been very consistent.

I remember when crabbers fished for crab, Salmon fisherman fished salmon and trawlers and a few longliners fished for cod, and 2 or 3 times a year we all chased halibut.

What were once clear and defined lines have blurred and overlapped.

I started my career fishing for crabs. As a crabber we, like all the others, bought all our cod from trawlers and a few longliners. In 1990 as a deckhand on a trawler I sold bait to local crabbers. From 1982 to 1990 no one I knew that crabbed caught their own hanging bait.

I point this out to show that way back then no one but trawlers and longliners fished for cod.

As my fishing career progressed more and more responsibility seemed to creep into my life. Marriage, children and steady bills. These responsibilities forced me to find a more consistent and reliable income, so I started trawling. Overall it has worked out pretty well, but over time, the reliable nature has left. There was never a market problem with cod, as the salmon fishery has been plagued with. The stocks have been steady and abundant, unlike the collapse of the crab in both the Kodiak area and the Bering Sea. Yet my fishery, the one that pays my bills is in serious trouble.

As the EA/RIR/IRFA clearly shows on page 50, the trawlers have averaged about twice as much ex-vessel dollars as the longhairs, while as the crab fishery collapsed and the pot gear vessels flooded into this unprotected fishery their ex-vessel dollars went from 1/3 of the trawlers, until they exceeded them.

The problem here is that LLP never protected the harvesters who were already in place and relying on this fishery. While salmon fishermen were protected and I.F.Q. implementation gave holders tremendous advantages to maximize safety and efficiency. Trawlers were forced to compete with a steady flow of incoming displaced pot gear vessels. This whole mess has landed us where we are today.

I ask you to please please review carefully the facts about historical reliance on cod by the trawlers who were fishing for cod before others came into this fishery. I appreciate everyone's efforts on the gear spit issue, I know it is a difficult situation.

Thank you
Sincerely
Lee L Woodard II
Captain F/V Leslie Lee



United Fishermen's Marketing Association, Inc.

P.O. Box 1035 Kodiak, Alaska 99615

Telephone 486-3453

Fax: 907-486-8485



May 27, 2008

Sent via Fax No.: 907-271-2817

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Re: C-4(b) GOA Groundfish Issues; Initial review of Pacific cod sector split

Dear Eric,

The United Fishermen's Marketing Association, Inc. (UFMA) includes harvesters who participate in the Gulf of Alaska (GOA) Pacific cod (p. cod) pot fishery. UFMA members are impacted by the proposed Council action that may divide the GOA p. cod TAC among gear and operation types based on historic dependency and use by each sector [i.e., "Initial review of Pacific cod sector split", C-4(b)].

We believe that the "Gulf of Alaska Pacific Cod Sector Split Purpose and Need Statement" ("Purpose and Need Statement") is an accurate portrayal of the circumstances that currently exist, and that are anticipated to occur in the future. Moreover, we believe that the Purpose and Need Statement forms a reasonable foundation and justification for the proposed action to divide the GOA p. cod TAC among the separate gear and operation types based on historic dependency and use by each sector.

We recognize that the CGOA p. cod pot fishery, and the Western Gulf of Alaska p. cod fisheries, each possess operational, management and gear sector structures that are respectively different, and that may require respectively different solutions to address current and anticipated circumstances and needs that may exist in each of these distinct areas. Therefore, we will generally indicate that our comments address the CGOA p. cod pot fishery.

Alternatives, Components and Options:

Alternative 2.

Component 2: Sector definitions

The Western and Central GOA Pacific cod TACs will be allocated among the following sectors:

Pot catcher vessels

For the "Pot catcher vessels" sector, we support the Option that establishes a separate allocation of CGOA p. cod among the "Pot catcher vessels <60 ft" sector, and the "Pot catcher vessels >60 ft" sector.

Additional option

We do not support the "Additional option" under "Component 2", that is, the "Combined allocation to the pot and hook-and-line catcher vessel sectors". This "Additional option" does not provide a realistic opportunity to respectively or optimally address current and anticipated future management and operational exigencies, or the achievement of the objectives and needs that are indicated in the Purpose and Need Statement, for either of these two distinctively different gear types. In fact, it is probable that the "Combined allocation to the pot and hook-and-line catcher vessel sectors" is contrary to meeting the promise of improved management and operational efficiencies that are otherwise provided through a division of the CGOA p. cod TAC between each of these two distinctively different gear types.

Nor is the "Additional option" supported by any analysis or rationale that would indicate that a combined allocation to these two distinctively different gear types (i.e., management measures, fishing practices and operational) would comport with the understanding that the need for the proposed action, and the purpose and benefits of such, are respectively otherwise addressed and achieved through a division of the CGOA p. cod TAC among distinct gear and operation types that is based upon the historic dependency and use by each distinct GOA p. cod sector.

The CGOA p. cod "Pot catcher vessel" sector and the "Hook-and-line catcher vessel" sector each respectively demonstrate distinctively different management, operational and historical dependence and use characteristics and challenges (i.e., bycatch, Steller Sea Lion protection measures, PSC mortality, etc.). A propitious opportunity to provide for the design and application of an array of gear-type-specific management measures, fishing practices and other solutions is provided only through the division of the CGOA p. cod TAC among these two sectors.

Component 3: Definition of qualifying catch

We support "Option 2" of "Component 3"; that is, "All retained Pacific cod harvested during the directed Pacific cod fisheries in the federal and parallel waters in the Western and Central Gulf".

Component 4: Years included for purposes of determining catch history

We support "Option 4" of "Component 4"; that is, "Qualifying years 2000-2006: average of best 5 years".

Thank you for your consideration of our comments.

Sincerely,



Jeffrey R. Stephan

188th Plenary Session
North Pacific Fishery Management Council
June 4-10, 2008
Best Western Kodiak Inn
Kodiak, Alaska

June 4, 2008

Public Comment Regarding Proposed Sector Splits and Management Options for the Jig Allocation

Dear Chairman Olson, Vice-chair Bundy and Council members,

My name is Leonard Carpenter and together with my wife Anita and family we own and operate a 36' foot fishing vessel. We longline and jig P. Cod in the federal and State fisheries, and also fish for rockfish and crab. The cod fisheries represent a major portion of our yearly income, and we are very dependence on these fisheries.

Pacific Cod Sector Allocations

Under 3.2.2 Options for Defining Qualifying Catch (pg. 56), we support option 2.

The majority of the set aside for bycatch in other directed fisheries has been used by the trawl fleet to top off their lower value target species thus maximizing their economic return. This has been at the cost of harvesters participating in the directed P. Cod fishery. It is for this reason that the sector split allocations should only be based on the actual retained catch during the directed P. cod fishery, and all incidental catch needs should be accounted for by individual sectors.

Under 3.2.5. Options for Calculating Sector Allocations (pg. 59), we support the qualifying years of 2000-2006: average of best 3 years.

Regarding the jig sector allocation and management options for the jig fishery, we request that the Council adopt the following as the preferred alternatives.

Under 3.2.6 Jig Allocation (pg.63), we support an initial allocation of 3 percent, with a stairstep provision to increase the allocation by 1 percent a year if 90 percent of the total combined State water jig GHL and federal allocation are met. This will ensure adequate harvesting opportunities for existing participants and new entrants. As operating costs continue to escalate, vessel operators from other gear sectors may find it advantages to switch to jig gear to help defray these high costs. Other benefits of jig gear are the extremely low by-catch and mortality levels and a very low environmental impact. For these reasons we also propose that no cap be set on our allocation.

Under Options for the Management of the Jig Allocation (pg. 64), we prefer option 1, the State managed fishery, with the addition of the following language, (underlined):

Option 1 State managed fishery, where the State would manage the State waters jig GHL and the federal jig allocation out to 200 miles under delegated authority.

In an effort to improve our overall catch we need the opportunity to fish our State water jig GHL outside three miles. Without this opportunity the State water jig GHL may continue to be stranded, and during the next BOF cycle will stand a good chance of being reallocated to pot vessels. The loss of this fishery would have a severe impact on the local small boat fleet, some of whom depend on this fishery as a source of year-round income.

State management under delegated authority would also enable the current state rollover to pot

gear to be utilized, instead of being reallocated to all gear sectors under a federally managed fishery. In an effort to further reduce stranded quota in our state water jig fishery we will also propose to the State BOF to amend the current rollover provision to make un-harvested jig quota available to pot gear on June 1st., instead of September 1st.,and also lower the current rollover threshold from 50% to 30%.

We also support the rollover provisions for any federal allocation the jig sector may receive as outlined in 3.2.7, provided adequate quota is reserved to ensure harvesting opportunities are available to the jig fleet until years end.

We also ask that the council exempt jig gear under Component 2, option a, and/or b and Component 2, Alternative 2 as recommended by the AP.

In closing, we respectfully request that the Council direct staff to continue to work with the state of Alaska and NMFS, to develop and advance the management structure for a State managed jig fishery from 0-200 miles, regardless of the outcome of P. cod sector allocations.

Sincerely,

Leonard and Anita Carpenter
FV Fish Tale
fishtalerulz@yahoo.com

C-4(b)

GOA Pacific Cod Sector Allocations EA/RIR/IRFA Errata

June 2008

p. 14 Table 2-3. Pacific cod numbers have not changed. Non-pcod numbers are corrected.

Table 2-3 Retained and discarded catch (mt) in Pacific cod target fisheries (2000-2006 annual average).

Western Gulf		Hook-and-line		Jig	Pot		Trawl	
Species	Retained or Discarded	CP	CV	CV	CP	CV	CP	CV
Pacific Cod*	R	3,623	62	83	375	6,059	176	4,819
Pacific Cod*	D	40	0	0	0	65	0	144
Flatfish	R	11	0	0	0	0	131	1
Flatfish	D	50	1	0	0	5	189	219
Rockfish	R	5	0	0	0	0	9	0
Rockfish	D	15	1	0	0	7	29	36
Roundfish**	R	18	1	0	0	1	25	44
Roundfish**	D	9	1	0	1	8	13	125
Skates, Squid, and Other Species	R	61	0	0	4	29	7	2
Skates, Squid, and Other Species	D	205	4	0	3	130	14	62

Central Gulf		Hook-and-line		Jig	Pot		Trawl	
Species	Retained or Discarded	CP	CV	CV	CP	CV	CP	CV
Pacific Cod*	R	841	5,278	73	409	5,964	506	8,531
Pacific Cod*	D	29	40	0	1	30	8	95
Flatfish	R	5	0	0	0	0	247	771
Flatfish	D	9	110	0	0	4	464	660
Rockfish	R	0	7	1	0	0	19	13
Rockfish	D	2	28	0	0	5	26	50
Roundfish**	R	2	42	1	0	2	20	319
Roundfish**	D	4	53	0	0	5	30	142
Skates, Squid, and Other Species	R	57	102	0	0	46	4	33
Skates, Squid, and Other Species	D	80	590	9	2	101	29	133

Source: NMFS Catch Accounting/Blend 2000-2006 *Does not include Pacific cod caught in other target fisheries
 ** Roundfish includes Atka mackerel, pollock, and sablefish

p. 15 The 'other species' complex is open to directed fishing in the GOA.

p. 33 EGOA GHF was lowered to 10 percent.

p. 35 Table 3-5. Kodiak start dates: 2003- Feb 16, 2004- Feb. 7, 2005- Feb 2, 2006- Mar 7.
 Cook Inlet start date in 2007- Feb 28.

p. 40 Table 3-12. In 2006, A season closed to all sectors (TAC) on Mar 2 (WG) and Feb 28 (CG)
 Table 3-13. In 2007, trawl B seasons in WG and CG closed on Oct 31 due to SSL measures

p. 82 Table 3-39. Old Harbor should be included.

Community	CQE	Fishery	1995-2000				2001-2006			
			Number of vessels	Total revenues	Catch (mt)	Percent of total revenues	Number of vessels	Total revenues	Catch (mt)	Percent of total revenues
Old Harbor	Y	CG Fixed	15	1,529,369	2,690	14.2%	8	752,900	1,045	9.1%

p. 83 Table 3-40. Total revenues, catch (mt), and percent of total revenues have not changed. Number of permit holders is corrected.

CQE	Fishery	1995-2000				2001-2006			
		Num. permits	Total revenues	Catch (mt)	Percent of total revenues	Num. permits	Total revenues	Catch (mt)	Percent of total revenues
Anchor Point	CG Fixed	32	1,765,585	2,868	9.3%	12	787,335	1,045	7.3%
Anchor Point	WG Fixed	2	*	*	*	1	*	*	*
Chignik	Y WG Fixed	0	0	0	0.0%	2	*	*	*
Chignik Lagoon	Y CG Fixed	2	*	*	*	2	*	*	*
Chignik Lagoon	Y WG Fixed	1	*	*	*	1	*	*	*
Cordova	CG Fixed	13	449,977	784	0.3%	0	0	0	0.0%
Cordova	CG Trawl	3	*	*	*	0	0	0	0.0%
Cordova	WG Fixed	1	*	*	*	1	*	*	*
Cordova	WG Trawl	1	*	*	*	0	0	0	0.0%
Delta Junction	CG Fixed	0	0	0	0.0%	8	1,464,760	1,944	24.1%
Dutch Harbor	CG Fixed	1	*	*	*	3	*	*	*
Dutch Harbor	WG Fixed	6	14,532	25	0.1%	9	157,331	282	1.1%
False Pass	WG Fixed	1	*	*	*	6	1,003,001	1,794	14.5%
Homer	CG Fixed	142	10,642,044	17,046	5.0%	87	11,893,987	16,402	5.3%
Homer	CG Trawl	2	*	*	*	2	*	*	*
Homer	WG Fixed	5	51,838	78	0.0%	15	903,018	1,151	0.4%
Homer	WG Trawl	2	*	*	*	1	*	*	*
Karluk	Y CG Fixed	0	0	0	0.0%	1	*	*	*
Kasilof	CG Fixed	4	50,838	90	0.3%	1	*	*	*
Kenai	CG Fixed	10	69,217	104	0.2%	1	*	*	*
Kenai	CG Trawl	1	*	*	*	1	*	*	*
Kenai	WG Fixed	2	*	*	*	1	*	*	*
King Cove	Y CG Trawl	9	359,168	1,048	0.8%	0	0	0	0.0%
King Cove	Y WG Fixed	37	2,400,817	5,427	5.1%	28	4,230,294	7,362	11.3%
King Cove	Y WG Trawl	14	5,161,194	12,259	11.0%	9	2,265,965	4,200	6.1%
Kodiak	CG Fixed	226	31,863,260	54,735	6.0%	171	22,666,177	31,071	4.3%
Kodiak	CG Trawl	77	22,500,055	46,700	4.2%	52	19,652,860	33,153	3.7%
Kodiak	WG Fixed	18	443,516	706	0.1%	36	2,722,832	4,957	0.5%
Kodiak	WG Trawl	11	841,940	2,258	0.2%	11	94,668	174	0.0%
Larsen Bay	Y CG Fixed	8	175,944	289	4.4%	2	*	*	*
Nikolaevsk	CG Fixed	12	451,691	722	8.1%	7	708,638	1,000	11.2%
Nikolaevsk	WG Fixed	1	*	*	*	1	*	*	*
Old Harbor	Y CG Fixed	16	1,587,776	2,799	10.8%	7	747,864	1,038	8.7%
Ouzinkie	Y CG Fixed	8	139,472	239	5.0%	1	*	*	*
Petersburg	CG Fixed	0	0	0	0.0%	1	*	*	*
Petersburg	CG Trawl	2	*	*	*	1	*	*	*
Petersburg	WG Fixed	0	0	0	0.0%	1	*	*	*
Petersburg	WG Trawl	0	0	0	0.0%	1	*	*	*
Port Lions	Y CG Fixed	10	526,948	1,018	7.6%	4	46,294	83	0.8%
Sand Point	Y CG Fixed	2	*	*	*	0	0	0	0.0%
Sand Point	Y CG Trawl	35	3,392,085	9,745	3.4%	11	46,494	72	0.1%
Sand Point	Y WG Fixed	47	1,353,621	2,647	1.4%	58	4,358,252	7,800	5.8%
Sand Point	Y WG Trawl	38	13,582,980	32,726	13.7%	25	5,026,755	8,908	6.7%
Seldovia	Y CG Fixed	13	3,375,317	5,731	15.4%	4	1,094,642	1,530	6.9%
Seward	CG Fixed	20	989,446	1,659	2.9%	9	266,946	331	0.8%
Seward	WG Fixed	1	*	*	*	0	0	0	0.0%
Sitka	CG Fixed	4	704,703	1,284	0.5%	2	*	*	*
Unalaska	CG Fixed	1	*	*	*	0	0	0	0.0%
Unalaska	CG Trawl	0	0	0	0.0%	1	*	*	*
Unalaska	WG Fixed	9	75,737	103	0.4%	6	348,687	433	1.6%
Unalaska	WG Trawl	1	*	*	*	0	0	0	0.0%
Wasilla	CG Fixed	7	738,867	1,250	3.4%	4	18,632	27	0.1%
Wasilla	WG Fixed	1	*	*	*	1	*	*	*
Wasilla	WG Trawl	0	0	0	0.0%	1	*	*	*
Willow	CG Fixed	4	651,469	849	21.7%	6	1,184,960	1,625	26.1%
Willow	WG Fixed	2	*	*	*	1	*	*	*

C-46)

We would like to make the following recommendations to consider in developing a sector split in the Gulf. Basically, if we're breaking out of status quo, we want to break out of status quo in the level of bycatch in the Gulf. We will offer 2 ways to accomplish this: gear conversion and distribution of incidental catch.

First, build a voluntary gear conversion mechanism to convert from trawl to pot for prosecuting the directed cod fishery. This would be a one time, one way valve.

Under component 2, sector definitions, add another bullet which reads: movement of allocation percentages between sectors.

With the fixed number of trawlers licensed to fish cod in the Gulf, a vessel could choose to migrate into the pot sector and take a calculated percentage of the trawl allocation with them. The percentage could be a percentage of the overall TAC divided by the number of licensed vessels or an average of a 3-5 year history.

The incentive for a trawler may be to reduce a portion of halibut PSC used when trawling for cod to use to prosecute fisheries constrained by halibut PSC. Market conditions may also favor iced, bled cod and serve to create economic incentives to convert. We need to build in the ability for this movement.

In terms of habitat, I believe it is important to recognize that the pot cod fleet has a very small footprint (an estimated 0.17 square mile footprint for the GOA and BSAI combined), as stated in the initial review document.

In addition, the halibut bycatch and associated mortality are much lower in the pot fishery and this action would, using the best available observer data, promote the use of gear with verifiable and monitored low bycatch.

Consider the following table for the directed cod harvest (all figures in pounds)

	2001	2002	2003	2004	2005
Trawl					
Cod harvest	38,051,786	28,234,602	27,817,928	27,890,681	24,063,456
Halibut discards	2,129,665	668,001	1,408,754	3,157,020	2,235,487
Halibut mortality (est)	1,340,411	407,855	888,463	1,926,840	1,362,457
Pot					
Cod harvest	12,222,428	15,427,949	45,399,794	32,024,348	32,033,167
Halibut discards	138,891	85,980	213,848	319,670	587,666
halibut mortality	8,818	4,409	30,865	55,116	99,825

Source: NMFS

From a conservation perspective, without a mechanism to convert to gear types with lower bycatch rates, it is difficult to support a sector split.

The second measure which could be built into a GOA sector split to reduce bycatch would be to put incidental landings back into the pool and then redistribute among the gear types. In this manner each sector receives a portion of the incidental catch based on the sectors allocation. This would be the most fair and equitable distribution as all gear types funded the incidental needs of the trawl sector, and in doing so, these sectors did not have the opportunity to gain history on a portion of the TAC.

Another option may be to distribute a portion of incidental catch to the trawl sector and put portion back into the pool for redistribution in gear types with less bycatch, it doesn't need to be an all or nothing scenario.

We recommend adding a 3rd option to component 3, definition of qualifying catch.

Add a range of percentages from 10 to 50% of the incidental catch to be allocated to the trawl sector.

Bycatch is greatest in the trawl fleet and in redistributing the incidental catch, bycatch savings would occur.

In addition, the fixed gear fleet will no doubt end up with more licenses to fish cod than is found in the trawl sector and as such provides entry level opportunity. A portion of incidental catch redistributed to the fixed gear fleet will help accommodate this growth.

Regardless of what action is taken, five years after the program is implemented there should be a comprehensive review that analyzes the program.

And finally, we support a set aside for the jig sector with a stair step provision and a LLP exemption. This fishery has tremendous entry level opportunity. A case in point is a young man fishing on our boat now. He is a displaced crab fishermen, a local Kodiak kid now pursuing different fishing opportunities. He has commented that jigging is a fishery he may actually have the ability to buy into. The local jig fleet is continually networking and information sharing about methods to improve catch rates.

We support option 1 as the preferred management option, a state managed fishery out to 200 miles. The greatest potential for the fleet would be the opportunity to fish in federal waters during the months when weather conditions are more favorable.

Alaska Whitefish Trawlers Association

**P.O. Box 991
Kodiak, AK 99615
(907) 486-3910
alaska@ptialaska.net**

May 28, 2008

To: Members of the North Pacific Fishery Management Council

Re: Kodiak Trawlers are Good Neighbors

Attached is a series of ads that appeared in the Kodiak Daily Mirror in January through March of this year.

The Kodiak trawl fleet is a vital part of the fish engine that keeps Kodiak running smoothly. Our trawlers catch and deliver half of all the whitefish delivered to Kodiak docks. Our vessels keep Kodiak's fish plants working all year long. As a simple example, one vessel delivering a full load can keep a plant operating for three days or more.

In addition, the trawl fleet spends millions of dollars each year supporting local businesses—everything from the grocery store, to the net shop, to the hardware store, to the fuel docks. In addition, repairs flow throughout the dockside economy, welders, electricians, mechanics, computer repair people are just a small sample of the services used regularly by the trawl fleet.

When you factor in the multiplier effect the result is exponential. The Kodiak Chamber of Commerce estimates that each dollar spent in Kodiak circulates six to seven times, helping to sustain and grow the entire business community.

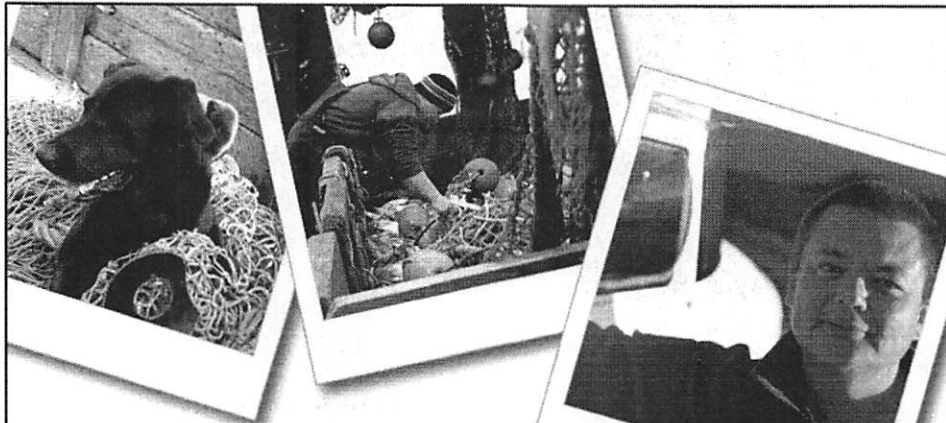
Our fishermen, skippers, and vessel owners are committed to keeping Kodiak and its various fisheries healthy and productive. Our fishermen are committed to being good neighbors, both on shore and at sea.



Steve Drage, President
Alaska Whitefish Trawlers Assoc.



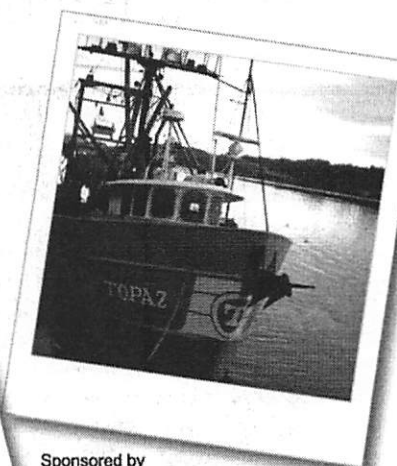
Alvin R. Burch, Executive Director
Alaska Whitefish Trawlers Assoc.



Know Your Neighborhood Trawler...



- We make our living from the sea
- You see us in the store and our boats in the harbor.
- We help keep Kodiak fish plants running all year long.
 - We spend millions supporting local businesses.
 - We are committed to sustainable fishing, reducing bycatch, raising our families.
 - We care about the future and protecting the ocean.
- We are your friends and neighbors, Kodiak's trawlers.



Sponsored by
Alaska Dragger's Association
"Fishermen for a sustainable Kodiak"



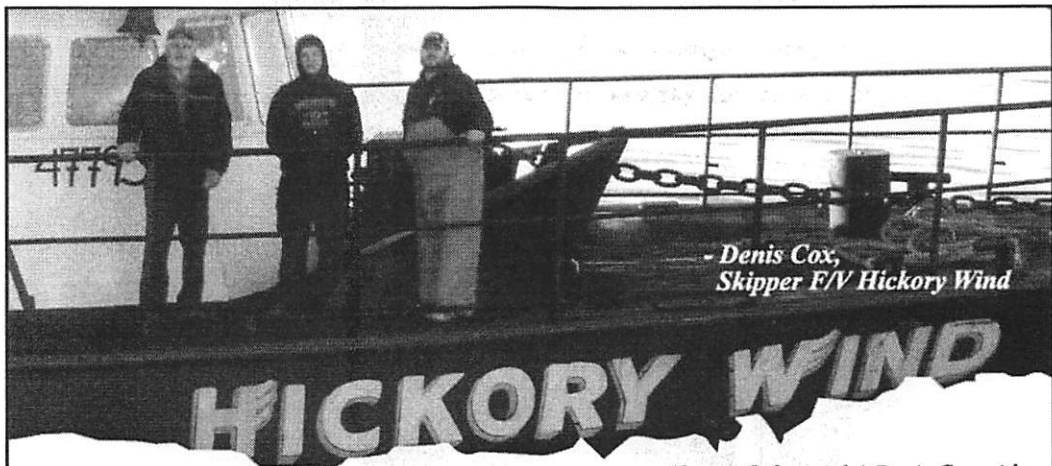
- Jason Chandler
Skipper, F/V Topaz

Know Your Neighborhood Trawler...

"I've grown up in Kodiak fishing on my family's boat and am now raising a family of my own. I'm happy to see some of the changes being made to help secure a healthy future for our fisheries."



Sponsored by
Alaska Draggers Association
"Fishermen for a sustainable Kodiak"



- Denis Cox,
Skipper F/V Hickory Wind

Know Your Neighborhood Trawler...

"The best thing about fishing is being able to have my family onboard the boat. I have 3 daughters, one son, 2 sons-in-law, 9 grandchildren and 4 great-grandchildren that live in Kodiak or Alaska and have at some time in their lives been involved in the fishing industry - some still are. We love Kodiak and plan to always live here".

Photo: (left to right) Denis Cox with
grandsons Jon Gier, Jason Albin

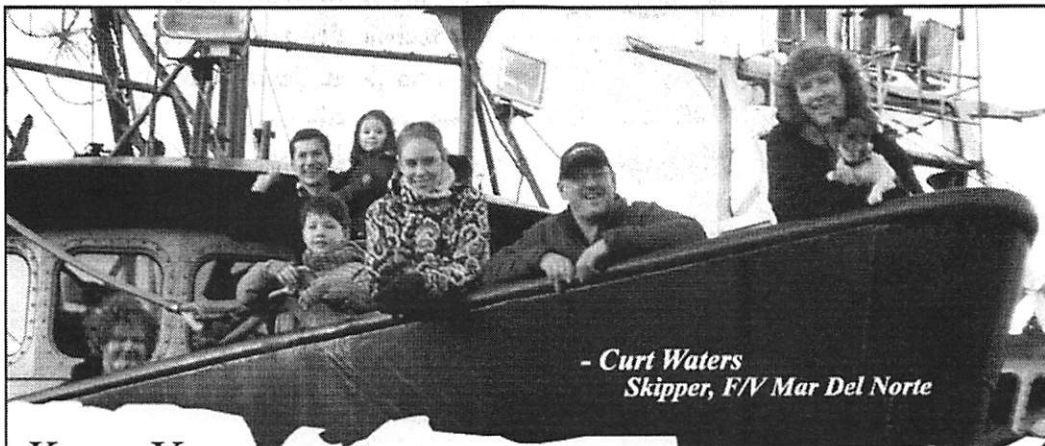
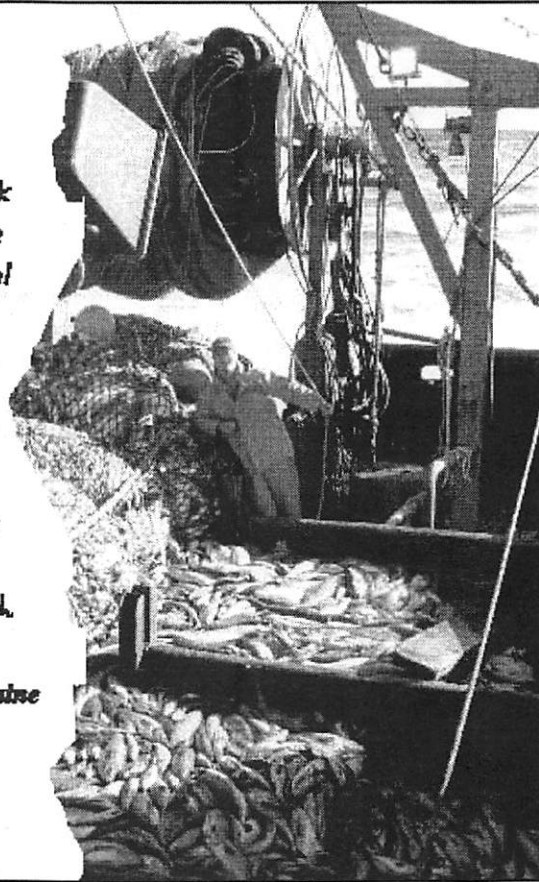
Sponsored by
Alaska Draggers Association
"Fishermen for a sustainable Kodiak"

Know Your Neighborhood Trawler...

"I was born and raised in Kodiak and believe it to be a great place to live and work. When my vessel uses bottom gear, it's almost always on gravel, sand, or mud bottom. If we do fish between rocks and reefs, a net made of plastic web is almost always the loser. Using trawl-mounted sonar allows us to "fly" the net, reducing bottom time and bycatch.

- Ron Naughton
Skipper, F/V Hazel Lorraine

Sponsored by
Alaska Druggers Association
"Fishermen for a sustainable Kodiak"



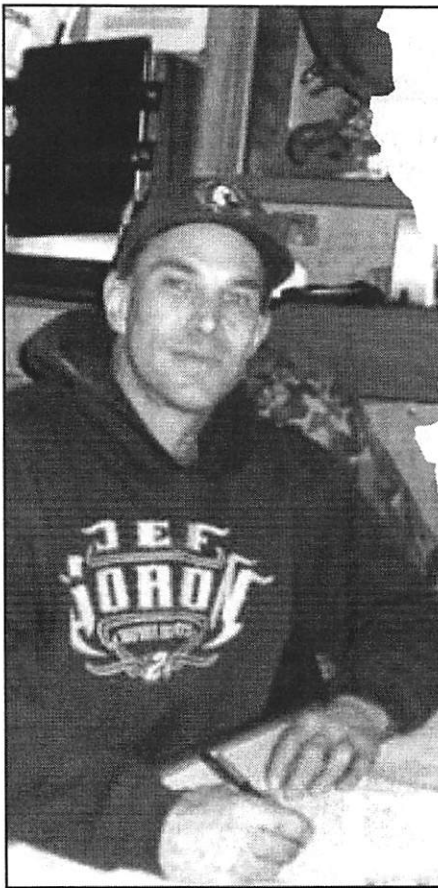
- Curt Waters
Skipper, F/V Mar Del Norte

Know Your Neighborhood Trawler...

"The best thing about being a fisherman is the freedom, fresh air, no stop signs, no traffic, just you, the crew, the boat and Mother Nature. There is no other job on the planet like fishing. Ten years from now, I hope all the animosity about trawling is gone and we can go fishing without worrying about what is going to be taken away from us next."

Sponsored by
Alaska Druggers Association
"Fishermen for a sustainable Kodiak"

Left- Right: Paddy Hogan, Juan Carlos Penaloza,
Jessica Penaloza, Curt Waters, Robin Overall



Know Your Neighborhood Trawler...

"I love Kodiak and being on the water. I came up here in 1982 to fish salmon and crab and have raised my two fisherman sons here. Most people are uninformed about trawling. Our boat had almost 50% observer coverage last year and has worked hard to keep our bycatch down. Someday I hope to travel around the U.S. in my RV, digging for precious stones and selling fish out of my freezer."

- Dan Courchaine,
Crew, F/V Topaz

Sponsored by
Alaska Draggers Association
"Fishermen for a sustainable Kodiak"

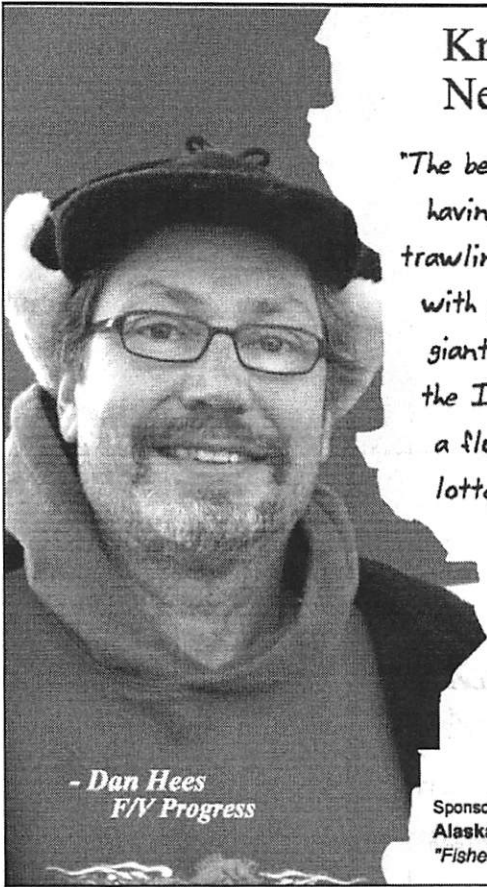


- Dennis Eggers
Relief Skipper, F/V Dawn

Know Your Neighborhood Trawler...

"I've been fishing out of Kodiak since 1996. I love the lifestyle and the beauty of the area. Our fleet has made big strides towards fishing cleaner and reducing bycatch. 10 Years from now, I hope to have retired to my property in the bush as a gunsmith."

Sponsored by
Alaska Draggers Association
"Fishermen for a sustainable Kodiak"



- Dan Hees
F/V Progress

Know Your Neighborhood Trawler...

"The best thing about being a fisherman is not having to stamp a time clock. I enjoy trawling because it is an efficient way to fish with great electronics - it's almost like a giant video game. 10 years from now I hope the Iraq war is over, that global warming was a fluke of nature, and that I have won the lottery so I can watch the cooking channel all day."



Sponsored by
Alaska Druggers Association
"Fishermen for a sustainable Kodiak"

Know Your Neighborhood Trawler...

"I have great respect for all fishermen regardless of gear type or fishery. For me, trawling is an effective and sustainable means to catch many species of fish. In some instances it may be the only effective means. My hopes are that, at the end of the day, we are all fishermen who have a sincere consciousness about the ocean that sustains us."

- Jim Hamilton, Skipper

Sponsored by
Alaska Druggers Association
"Fishermen for a sustainable Kodiak"



Alaska Whitefish Trawlers Association

**P.O. Box 991
Kodiak, AK 99615
(907) 486-3910
alaska@ptialaska.net**

May 28, 2008

To: Members of the North Pacific Fishery Management Council

Re: Change of Name for Alaska Draggers Assoc. to Alaska Whitefish Trawlers Assoc.

I would like to take this opportunity to introduce the new name of our long-standing association of Kodiak-based trawlers.

Thirty six years ago, in 1972, the original Kodiak Shrimp Trawlers Association was formed to foster and promote the interests of those engaged in the shrimp trawl business in Alaska.

Times changed and fisheries changed, and so did our group's name. In 1985 we became the Alaska Draggers Association with emphasis and membership shifting to the segment of the trawl fisheries including vessel owners, skippers and crewmembers.

I need not tell you, members of the North Pacific Fishery Council, that the trawl fisheries has changed greatly since the mid-1980s, and so we changed our name this year to more accurately reflect the current fishery.

Our new name, Alaska Whitefish Trawlers Association was suggested by one of the skipper/owners of a local boat who started as a crewmember and recently purchased a boat of his own. His explanation is that he is proud to be a trawler but the name needed to reflect the broader aspects of whitefish fishing and the changes in technology that makes today's trawlers an entirely different breed than those who fished in the 1980s, 1990s, or even five years ago.

Today's trawlers are committed to harvesting seafood like cod, pollock, rockfish and sole in ways that protect and sustain the fisheries. Our Kodiak fishermen continually incorporate new innovations into their gear and vessels to reduce bycatch, minimize impacts to the seafloor, and insure the sustainability of the resource and the broader ecosystem.

Thank you for your time today, and for all the time members of the NPFMC have committed to making and keeping Kodiak's fisheries strong.

Steve Drage
President
Alaska Whitefish Trawlers Association



Alaska Whitefish Trawlers Association

**P.O. Box 991
Kodiak, AK 99615
(907) 486-3910
alaska@ptialaska.net**

June 7, 2008

Mr. Chairman and members of the North Pacific Fishery Management Council:

My name is Al Burch. I am the Executive Director of the Alaska Whitefish Trawlers Association. I am here to support the sector split of cod between fixed and mobile gear based on retained catch 1995 to 2005, best 7 years. We cannot survive any more erosion of our history.

If '95 to '05 is to be negotiated, I would like you to consider April 19, 1983 to August 3, 1990. To give you a sense of history of the cod fishery, in 1983 Governor Sheffield allowed us a permit to deliver cod to a Portuguese salt cod processor. This gave us the opportunity to explore and develop the cod grounds in the GOA and out west.

In 1984 the Portuguese started to jack around our price and quantity. By then we could provide good quality and quantities of cod but needed a better and more stable market. Trident agreed to work with us and started to salt cod in Akutan. When the plant burned the Alaska Fisheries Development Foundation (AFDF) awarded Trident a grant to produce cod fillets. They did a good job and other plants out west and in Kodiak started to produce frozen product.

August 3, 1990 AFDF issued an RFP, bid # 190, to contract a vessel charter in the Kodiak area for a cod pot study. Until that time almost all cod were caught by trawl. If you want to consider another set of years, April 19, 1983 to August 1990 would make me very happy.

The reason I have spent this time on old history is so you will know that if you have heard or do hear how the trawlers have impacted and eroded other sectors, those are not true statements.

We created the interest and the markets and for many years it was 100 percent trawl fished. When we finally got the market in place and the price up the erosion started.

Thank you for your time and attention.



Alvin R. Burch
Executive Director
Alaska Whitefish Trawlers Association

C-4(b)

Polar Star, Inc.

Patrick Pikus, President

P.O. Box 2843

Kodiak, Alaska 99615

(907) 486-5258 Fax (907) 486-5413

Proposal for GOA Pacific Cod sector split.

Tables were taken from Table E-1 of GOA Pacific cod sector split initial review draft, May 2008.

The numbers in bold in the rows labeled "Average" are the average of the numbers in the column above for each sector.

Central Gulf, all possible options.

Period		HAL CP	HAL CV	Jig CV	Pot CP	Pot CV	Trawl CV	Trawl CP
All cod	1995-2005 Best 7 years	2.8	17.2	0.2	2.1	24.6	47.8	5.3
	1995-2005 Best 5 years	3.4	17.5	0.2	2	25.3	45.9	5.6
	2000-2006 Best 5 years	4.2	20.7	0.3	1.2	25.2	44	4.4
	2000-2006 Best 3 years	4.7	19.4	0.4	1.4	27.9	41.8	4.4
Directed Cod	1995-2005 Best 7 years	3.1	18.5	0.2	2.6	25.9	45.6	4.2
	1995-2005 Best 5 years	3.8	18.9	0.2	2.4	26.5	43.6	4.6
	2000-2006 Best 5 years	4.6	22.6	0.3	1.8	27.9	39.7	3.1
	2000-2006 Best 3 years	5.2	21.1	0.4	1.5	30.3	38.1	3.4
Average		4.0	19.5	0.3	1.9	26.7	43.3	4.4

Central Gulf, 2000-2006 options.

Period		HAL CP	HAL CV	Jig CV	Pot CP	Pot CV	Trawl CV	Trawl CP
All cod	2000-2006 Best 5 years	4.2	20.7	0.3	1.2	25.2	44	4.4
	2000-2006 Best 3 years	4.7	19.4	0.4	1.4	27.9	41.8	4.4
Directed Cod	2000-2006 Best 5 years	4.6	22.6	0.3	1.8	27.9	39.7	3.1
	2000-2006 Best 3 years	5.2	21.1	0.4	1.5	30.3	38.1	3.4
Average		4.7	21.0	0.4	1.5	27.8	40.9	3.8

CGOA CV trawl sector catch history



C-4(b)

June 8 2008
C-4b)

My name is Julie Kavanaugh, my husband Ron and I own and operate the FV Sylvia Star. Ron has lived in Kodiak since 1966, I grew up in Ketchikan, moving to Kodiak at 16. Ron has fished for 34 years and has invested his life into his profession.

Sector splits was a suggestion of his made to the AP a handful of years ago. Several people in this room were present and several were on the AP at the time. We still support sector splits and recognize it's stabilizing affects. We cannot support a sector split action prior to LLP latency being addressed. You can't divide up the pool with out first defining the characters. The drag fleet now has it's participants identified and are protected from increased effort. The fixed gear fleet will need to be identified equitably and similarly so that sector splits are also fair and contain the same protections. The stability of LLP reduction will need to reflect the same intent for fixed gear or sector splits will need to reflect those discrepancies made by council. If you allow recency and new entrants in the fixed gear fleet it will be necessary for council to fund this decision and it's effect from the over all TAC prior to setting sector allocations.

We would also request that the 2.9% cod allocation to the rock fish pilot program be funded from the drag fleet's directed catch. We view this allocation as an incentive fishery and not as bycatch or incidental catch. Therefore it is appropriate for the drag fleet to fund this incentive as they are the beneficiaries. This allocation should come off the total Drag fleet allocation and not be concentrated in the B season. We view this as a shift in allocation with the intent to increase one sectors overall share.

Finally and most adamantly we support only sector allocations that reflect directed catch history. Data and observer coverage has been acknowledged as flawed and we are only now in the process of review and implementing changes to correct these problems "bycatch and incidental catch" allocations were awarded exclusively and the economic benefit denied to other sectors.

~~_____~~

North Pacific Fishery Management Council
188th Plenary Session June 4-10, 2008 Kodiak Best Western Inn

June 8, 2008

For the record: Testimony of Darius Kasprzak

RE: C-4 GOA groundfish issues (b)

Mr. Chairman, Vice Chairman, Secretary, and Council members,

I'm Darius Kasprzak, a participant in GOA groundfish harvests in all sectors for the past several decades, currently specializing in the GOA groundfish/rockfish jig fishery with my 39' FV Malka. I am here today to advocate a FMP change for the GOA groundfish jig fishery.

I would like to clarify that a desire to amend the GOA jig groundfish fishery should not necessarily be construed as a blanket endorsement of sector splits across the board. Personally, I consider the concept of sector splits to be inconsistent with national standard # 9 (regarding bycatch and conservation measures) by restricting cleaner fishing sectors from competing freely with sectors realizing higher bycatch and bycatch mortality. Instead of locking TAC into the dirtier fishing sectors, the council should instead be providing incentives for those vessels to convert over to the cleaner sectors.

In addition, prior testimonies addressed to the council from community and village stakeholders have expressed apprehension that sector splits may impede their ability to switch gear types fluently as seasonal, marketing, weather, and fishing conditions dictate. These are legitimate concerns that need to be addressed. Majority stakeholder approval for a FMP change within their respective sector (s) should be demonstrated on a sector by sector basis before any implementation of sector splits.

With these reservations expressed, **I urge you to support a state managed jig Pacific cod fishery-- federal management authority would go to the state of AK to manage a state gear specific fishery out to 200 miles .** I recommend setting aside at least 3% of the central and western GOA pacific cod TAC for the jig sector, with a staircase provision to increase the jig sector allocation by 1% if 90% of the federal jig allocation in an area is harvested in any given year. Given the uncertainties of how sectors may best prove sustainably productive during the fuel crisis in the years to come, and in considering our relatively light environmental footprint while providing widespread employment for our coastal communities, **I oppose a ceiling for the step up of federal allocation to the jig sector.**

Thank you for your time and consideration and the opportunity to comment .

Sincerely, Darius Kasprzak (907) 942-2504