

Testimony of Mr. Steve Bodnar, Coos Bay Trawlers Association

We ask the Council to not deem this package of program components rule regulations and to make the necessary steps to have the program implemented on January 1, 2012. There are too many trailing amendments needed to say that this program is ready for implementation. The deeming working group is still scheduled to meet to continue the deeming process and we don't see that the time period following that meeting is long enough to meet the public comment period. If the only way to delay the implementation of the program to 2012 is to not approve today's deeming, then we must insist that you don't approve the deeming today.

It seems that it may be impossible to implement this program by January 1 following the short "cooling off" period which concludes on December 28. We believe that the entire fleet as well as management staff would benefit from a longer "cooling off" period during which time a less hectic pace could be used to out-reach with the fleet, to finalize contracts with processing plants, to establish good observers agreements, to complete first receiver permits with the needed plant preparations, to clarify the first receiver regulations which complicates selling fish in the round, to determine quota share conversions and issuance, to clarify halibut by-catch issues and to finish the many other tasks that need to be completed before the program can function properly.

The reason we feel this way is because most non-whiting trawl fishermen feel unprepared and uninformed about this program. What they have failed to comprehend about this program, even if caused by their own lack of participation in the management process, have most of the sector worried about their future ability to continue to earn a living in the trawl sector. We understand the whiting sector wants to lock this program in place as quickly as possible and to get it moving, but the rest of the trawlers are hesitant because of their lack of understanding on how they will be affected by this program. Furthermore, the non-whiting sector has no other IQ fishery to rely on, no other region to run to, to capture more revenue. All our earnings are made right here on the lower west coast and we have many species to consider beside just whiting and the related by-catch. We are trying to figure out how we can access our entire quota which is not as easy to do when we don't have access to the RCA like the whiting fleet. We have not received enough by-catch species to accommodate our target species and it is not just one or two target species involved but many of our quota species fall into a restrictive pattern. We need time to be able to effectively coordinate our nearshore catches with those who fish shoreward of the RCA and our deep water catches with those who fish deep. It isn't a simple matter of just trading quota. If you are operating in a pooling environment to make the best use of the overfished species, time is needed to establish and massage those relationships with like minded fishermen to make those arrangements work.

If the whiting sector exceeds their quota or caps, they have other choices in Alaska they can utilize; if the non-whiting sector exceeds their quota or caps and cannot purchase what they need they are done for

the year. That is a stark contrast to the whiting fleet. We fear the program because most of us have received quota about 50% of what we are currently landing. We fear the program because our longest lived participants in this fishery, the backbones of our industry are going to be forced to downsize. We fear the program because the cost will be prohibitive. We fear this program because whoever is left after this program is functioning and the fleet is reduced to the level the program analysis says it will be will have the "buy-back" program debt on their shoulders, way too much burden for these sized vessels. What harm would be done by not implementing the program on January 1, 2011 to allow us to work out our concerns so our portion of the program can be successful, too? We are asking for an increased "cooling off" period to allow the non-whiting sector to get organized. The cost recovery to our sector, at this point, seems unsurmountable.