



U.S. FISH and WILDLIFE SERVICE  
BUREAU of LAND MANAGEMENT  
NATIONAL PARK SERVICE  
BUREAU of INDIAN AFFAIRS

**Federal Subsistence Board**  
1011 E. Tudor Rd., MS 121  
Anchorage, Alaska 99503-6199



RECEIVED  
MAY 25 2011

FWS/OSM11057/TT

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

MAY 20

Dear Mr. Olson:

The Federal Subsistence Board (Board) appreciates the opportunity to provide its comments on the initial review draft of the *Environmental Assessment/ Regulatory Impact Review/ Initial Regulatory Flexibility Analysis for Amendment 90 to the Fishery Management Plan for Groundfish of the Gulf of Alaska, Chinook Salmon Bycatch in the Gulf of Alaska pollock Fishery (EA)*, dated March 2011, and the North Pacific Fishery Management Council's (NPFMC) preliminary preferred alternative. The Board, comprised of the Regional Directors of the U.S. Fish and Wildlife Service, the Bureau of Indian Affairs, the National Park Service, the Bureau of Land Management and the USDA Forest Service, and a Chair appointed by the Secretaries of the Interior and Agriculture, provides subsistence fishing opportunities in Federal public waters in Alaska under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA).

Bycatch is of concern to the Board and the affected Regional Advisory Councils because the Chinook salmon stocks listed in Table 63, page 124 of the EA, are important subsistence resources for Federally-qualified subsistence users in several areas of the state, including Southeast Alaska, Prince William Sound, Cook Inlet and Kodiak Island.

The Board urges the National Marine Fisheries Service and North Pacific Fishery Management Council to significantly reduce the amount of Chinook salmon bycatch in the GOA pollock fishery. Several Chinook salmon runs, most likely impacted by the GOA pollock fishery, were rated as "poor" to "below average" in 2010, as pointed out in Table 63, page 124 of the EA. The Chinook salmon runs on Kodiak Island are of particular concern. In 2010, Chinook salmon escapement in the Karluk River was below the escapement goal range for the fourth consecutive year and the subsistence fishery was closed the entire season. This was the third consecutive year that restrictions to the Chinook salmon subsistence fishery were necessary. In January 2011, the Alaska Board of Fisheries designated Karluk River Chinook salmon a stock of concern. In the nearby Ayakulik River, the lower end of the Chinook salmon escapement goal was achieved in 2010, however escapement goals were not met in 2006-2009.

The Board believes that the proposed hard cap of 22,500 in the Preliminary Preferred Alternative does not represent a meaningful reduction in Chinook salmon bycatch, as it is higher than the 2003-2010 bycatch average of approximately 19,000 Chinook shown in Table 4, page 21. Therefore, **the Board recommends that a hard cap of 15,000 be adopted.** This alternative would provide a better opportunity for increased numbers of Chinook salmon to reach affected rivers to help achieve escapement goals and provide for subsistence uses. In addition, the option of allowing a 25% "overage provision" one out of every three years should be eliminated, as it appears to be incongruent with the Council's stated goal to reduce bycatch. The Board also recommends that the NPFMC recognize the importance of subsistence in the Problem Statement and more fully discuss the status of the Chinook salmon stocks most likely impacted by the GOA pollock fishery.

Thank you for this opportunity to provide our comments and recommendations on this important subsistence issue. If the Board can be of further assistance, please contact Peter J. Probasco, Assistant Regional Director, Office of Subsistence Management, at (907) 786-3888. The Board will continue to monitor developments on this issue and looks forward to the results of your efforts to significantly reduce Chinook salmon bycatch in the GOA pollock fishery.

Sincerely,



Tim Towarak  
Chair, Federal Subsistence Board

cc: Federal Subsistence Board members

Gene Virden, Acting Regional Director - Bureau of Indian Affairs  
Bud Cribley, State Director - Bureau of Land Management  
Sue Masica, Regional Director - National Park Service  
Geoff Haskett, Regional Director - U.S. Fish and Wildlife Service  
Beth Pendleton, Regional Forester - USDA Forest Service  
Pat Pourchot, Department of the Interior, Alaska  
Peter J. Probasco, Office of Subsistence Management  
Speridon Simeonoff, Chair, Kodiak/Aleutians Regional Advisory Council  
Ralph Lohse, Chair, Southcentral Alaska Regional Advisory Council  
Bert Adams, Chair, Southeast Alaska Regional Advisory Council  
Cora J. Campbell, Commissioner, Alaska Department of Fish and Game  
James W. Balsiger, Administrator, Alaska Region, National Marine Fisheries Service

**Tom Evich**  
F/V Karen Evich  
2051 North Shore Rd.  
Bellingham, WA 98226  
Cell (360) 201-0486  
Fax (360) 393-4681

May 2, 2011

Chairman Eric Olsen  
North Pacific Management Council  
605 4<sup>th</sup> Ave. Suite 306  
Anchorage, AK 99501-2252

Dear Chairman Olsen,

I really wish the Council would have acted with this much resolve and urgency when Gulf rationalization was on the agenda, as it is reacting to the by-catch issue. In a perfect world I would have been notified as to how many salmon I was allowed to catch for the year thus, I would have no one to answer to but myself on how to control salmon by-catch. But, it is not a perfect world, and I now have to travel to Nome in hopes of impressing the Council how important this is, and if too low a number of Chinook salmon is chosen, it is effectively closing the pollock fishery early.

I own and operate a 58' trawler based in Sand Point, Alaska. The boat trawls for pollock and cod, seines for salmon and herring. It also fishes crab and tenders in Bristol Bay. Pollock, on average over the last four years accounts for about 44% of my boat's annual income, so, again, I want to impress upon you that it is important to me and my crew.

First, I think that the Council has already been convinced of the fact, that we did not catch as many Chinook that was claimed that was caught, in the Western Gulf during the fall of 2010. One of my concerns is that this abundance of salmon was not an anomaly and that it will continue to be a big problem. I have a friend that tenders in Chignik and he was telling me how many of these same salmon, I am assuming, that were caught in the Chignik seine fishery. This was before we even went pollock fishing last fall. The reason there are a lot of Chinook being caught, is because there are a lot of them. I am afraid that we are saving a lot of salmon for some hatchery some where. Is there any research to dispute this?

I am also afraid that too low of number will be chosen for either the Western or Central Gulf. If too low of a number is decided upon I believe that there is a good chance that Central Gulf trawlers have the potential of coming to the Western gulf, "grabbing a load" and taking it back to Kodiak. At that point NMFS is going to become concerned, because of extra effort, with both pollock quota and salmon caps, which will result in closures. Last fall, I believe, that we were closed for five days while they compiled pollock totals to decide whether there was enough to warrant re-opening the season. I hate to imagine what it is going to be like when they have to stop and count salmon and pollock. I foresee short openers, long closures that will add expense and time for the processors, me, and the crew. I will not be surprised if we get to the end of October and we will not know for certain if we have reached the salmon cap, or pollock quota. What happens if it is justified for the pollock quota to go up? It appears that at best, we will be locked into the present quotas.

In the fall, when we catch most of the salmon, I agree that the by-catch is worse after dark, and I believe, that we can all agree not to tow in the dark. After that, there is nothing that we will do, as a fleet, to control the catch of salmon. There has been talk of identifying "hot spots". The Western Gulf is not the Bering Sea. There are two trenches/ areas, close to Sand Point where, I would guess, seventy five to eighty percent of the C and D quotas are harvested from. There have been times when the entire fall quota is taken in only one of these areas. What if that area becomes a "hot spot".

It will only take one individual, and that one individual may very well be me, to say "we did not deliver any salmon, we are going to tow." Then we will all have to tow. If we were not racing for fish I could, 1) make a short tow to see if there was an abundance of salmon. 2) try another area ( Maybe in another area fishing may be considerably slower, but if you are not racing for fish, it may make more sense to fish in a different area, with slower fishing, to avoid salmon.) and 3) maybe even stand down for a day or so to see if there abundance decreases.

Regarding salmon excluders. I have personally heard mixed reviews, as they allow for pollock to escape. Unless the council mandates them, or the whole fleet agrees, which I very much doubt, what's the point? I will not make the investment in an excluder that may slow down my fishing, when not every one else in the fleet is doing the same. I would rather invest the money into making the boat more efficient, trying to catch as much pollock as I can before it closes for what ever reason.

This council chose that we race for fish. Fine, but now you are mandating that we control/reduce salmon by-catch. You cannot control by-catch, of any kind, while racing for fish. You know that as well as I do.

Sincerely,

Tom Evich

NPFMC, Eric Olson, Chairman  
605 West 4<sup>th</sup> Ave. Suite 306  
Anch. AK 99501

To NPFMC,

5-27-11


**The North Pacific Fishery Management Council must take immediate action to stop the King Salmon 'bycatch' from the Pollock Trawler Fleet. The King Salmon is probably the most important fish in Alaska as a personal use, subsistence, and sport fishery.**

**The main diet of my family is King Salmon. There are many people in Alaska who count on King Salmon to feed their families, either directly, or from money earned commercial fishing or guiding.**

**The King Salmon has been an important fish in Alaskan waters WAY longer than Pollock.**

**It is the responsibility of the NPFMC to fix this major problem.**

Sincerely,

  
E. Ann Koskovich

**NPFMC, Eric Olson, Chairman  
605 West 4<sup>th</sup> Ave. Suite 306  
Anch. AK 99501**

**To NPFMC,**

**5-27-11**

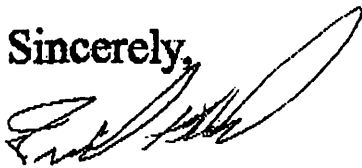
**The North Pacific Fishery Management Council must take immediate action to stop the King Salmon 'bycatch' from the Pollock Trawler Fleet. The King Salmon is probably the most important fish in Alaska as a personal use, subsistence, and sport fishery.**

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**The King Salmon has been an important fish in Alaskan waters WAY longer than Pollock.**

**It is the responsibility of the NPFMC to fix this major problem.**

**Sincerely,**



**Richard J. Koskovich**

May 31, 2011

To: Eric Olson, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup>, Suite 306  
Anchorage, AK 99501-2252  
Fax: 907-271-2817

Re: C-4 GOA Chinook salmon Bycatch

Dear Mr. Chairman:

Thank you for the opportunity to comment before the Council on Chinook salmon Bycatch in the GOA Pollock fisheries.

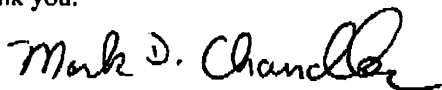
I own the F/V Topaz with my son Jason. We have been operating the vessel in the GOA for 32 years and are 100% dependent on the trawl fisheries. We desperately need adequate tools to minimize bycatch. I fear that without a catch share system for individual accountability that we will continue to struggle as a fleet to keep bycatch at a minimum.

The fleet is taking this issue very seriously and are educating ourselves and working together to monitor and control Chinook salmon bycatch as best we can but we still lack the effective tools necessary to reduce salmon bycatch with enforceable individual accountability. The best we can do with the limited tools available is control Chinook salmon bycatch to prevent high bycatch as occurred in October of 2010. The Council needs to consider the impacts of their decision and balance the outcome of the bycatch control action for all the National Standards: NS1 Optimum yield (catch the available pollock quota), NS8 minimize adverse impacts to fishery dependent communities (both pollock dependent communities and salmon dependent communities), and NS9 minimize bycatch (Chinook salmon) to the "extent practicable".

I am asking that you be fair, recognize my history and dependence on the pollock fishery and protect my community which thrives on the trawl-caught fish. Please give the fleet the tools and the time to learn to control our bycatch so we can fully prosecute the pollock fisheries. I am requesting a gulf-wide cap of 30,000 fish split 23,000 fish for the Central Gulf and 7,000 for the Western Gulf with implementation in 2013 to coincide with the start up of the newly restructured Observer Program. I believe that this action should be an interim measure only until such time that we - like the Bering Sea fleet - have real tools to control and reduce our Chinook bycatch. I support full retention of all salmon in the pollock trawl fisheries.

My vessel and crew spend money each year in and around Kodiak on observers, fuel, mooring, groceries, boat supplies and maintenance, equipment and retail services, entertainment. My vessel fishes year-round and delivers its catch to shorebased plants in Kodiak. My vessel's deliveries keep the resident Kodiak processing workforce employed year round.

Thank you.



Mark Chandler  
4934 Lakeshore Dr.  
Florence, OR 97439

Mr. Eric Olson, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup>, Suite 306  
Anchorage, AK 99501-2252  
Fax (907) 271-2817

May 31, 2011

Re: June 2011 Council meeting  
Agenda item C-4 – Final action, GOA Chinook salmon bycatch

Dear Chairman Olson and members of the Council:

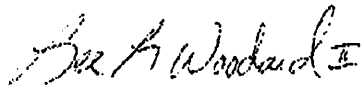
I realize how much material you have to read and absorb so I will be very brief.

The GOA Chinook salmon bycatch issue, if not handled very carefully, will have a potentially devastating effect on me. I only ask that you consider how your decisions will affect the trawl fleet and Kodiak residents and workers who rely on our groundfish harvests.

The trawl fleet supplies the volume with consistent deliveries throughout the year that hundreds of people rely on directly here in Kodiak. I appreciate all that you do and the tough decisions that you have to make. Until such time that we have the proper tools to control and reduce our salmon bycatch, I am asking that the hard cap be set at 30,000 Chinook, split 23,000 for the Central Gulf and 7,000 for the Western Gulf.

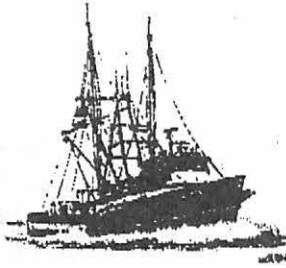
Thank you.

Sincerely,



Lee L. Woodard, II  
Owner F/V Leslie Lee, F/V Pacific Storm





# Marcy J, Inc.

## F/V Marcy J

Harold Jones

1217 Kouskov Street  
Kodiak, Alaska 99615  
Tel. (907) 486-4487  
Fax (907) 486-5170

5/31/2011

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

Dear Mr. Chairman,

My fishing vessel Marcy J has fished Pollock since the beginning of the Pollock fisheries; both in the Bering Sea and central Gulf of Alaska.

Since my sons and I were salmon fisherman for 20 years we are very interested in saving the species.

As trawlers we have done everything possible to prevent the by-catch of salmon, including the purchase of a salmon excluder at the cost of approximately \$10,000.00. The excluder is designed to allow the escapement of the salmon from the trawl net and does so very well. Since we have installed the excluder in our trawl net it has been very successful.

The City of Kodiak depends on the product of the trawl fleet for the majority of year round employment of hundreds of people.

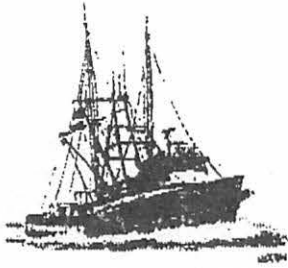
The F/V Marcy J itself employs approximately 10 people for the sole support for their families.

We ask for your patience as we work to resolve the by-catch problem.

Sincerely,

A handwritten signature in black ink that reads "Harold Jones". The signature is written in a cursive, flowing style.

Harold Jones  
F/V Marcy J



# Marcy J, Inc.

## F/V Marcy J

Harold Jones

1217 Kouskov Street  
Kodiak, Alaska 99615  
Tel. (907) 486-4487  
Fax (907) 486-5170

5/31/2011

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

Dear Mr. Chairman,

I am the captain of the F/V Marcy J.

Fishing is the sole support for my family and has been my whole adult life. My crew and I work hard to prevent by-catch in every way possible. We have installed a salmon excluder in our net. This was tremendously helpful.

The trawl fleet is the main year round support for the City of Kodiak. The F/V Marcy J purchases all her fuel, groceries, supplies, repairs and equipment in Kodiak.

We try to fish in areas where salmon is least abundant in order to help reduce by-catch.

The trawl fleet is working together to reduce the salmon by-catch in every way possible.

Very truly yours,

Mike McElhenie

A handwritten signature in black ink that reads "Mike McElhenie". The signature is written in a cursive, flowing style.

MAY 31, 2011  
KODIAK, AK 99615

MR ERIC OLSON  
CHAIRMAN NPFME  
605 W 4th AVE SUITE 306  
ANCHORAGE, AK.  
FAX 907 271-2817

MR CHAIRMAN,

I WAS BORN IN KODIAK AND HAVE  
BEEN FISHING FOR 62 YEARS. I SEE  
THE TRAWL FLEET DOING SERIOUS  
DAMAGE TO OUR HALIBUT, SALMON,  
KING CRAB, AND TANNER CRAB!

IT IS UP TO YOU TO STOP THIS!

J. Harold Olson  
F/V VIKING STAR  
Box 322  
KODIAK, AK. 99615

Mr. Eric Olson, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup>, Suite 306  
Anchorage, AK 99501-2252  
Fax (907) 271-2817

May 31, 2011

Re: June 2011 Council meeting  
Agenda item C-4 – Final action, GOA Chinook salmon bycatch

Dear Chairman Olson and members of the Council:

My name is Chandler Johnson and I would like to comment on chinook bycatch in the GOA pollock fisheries. I have run the fishing vessel Walter N. for 19 years. This is a Kodiak vessel that is family owned. We participate in many fisheries, but rely heavily on pollock in both the Bering Sea and Gulf of Alaska.

We do have chinook bycatch in both areas. We ARE working to reduce it. I am happy with the chinook program in the Bering Sea, as it gives us the chance to try different methods of bycatch reduction. We have been experimenting with an excluder this year, and in the Bering, we can use it and make changes without worrying about reducing our pollock catch. In the GOA, with the race for fish, we don't always have the time for testing, as we can lose out on catch. We are however, using our excluder and comparing catch rates and bycatch rates among vessels.

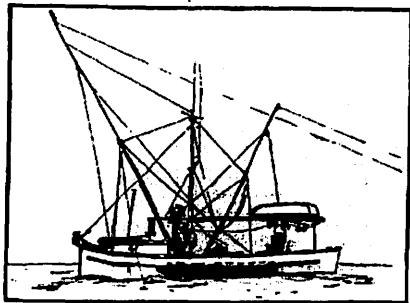
Full retention of salmon would be a step in the right direction, as sampling could help determine where these salmon are originating. In my observations, I have noticed large percentages (30-40%) of hatchery fish among these salmon. You can't flood the ocean with huge numbers of hatchery fish and not expect bycatch to go up.

I would like to see a 30,000 fish gulf-wide cap with 23,000 fish for CGOA and 7,000 fish for WGOA, not to be implemented until the observer program is restructured.

The best way we can reduce bycatch is to let the fleet work among ourselves. We have shown in the CGOA that we can communicate with each other in ways that reduce our bycatch. We did this in fall 2010 and greatly reduced our halibut bycatch in our cod fishery.

Thank you,

Chandler Johnson  
Skipper, F/V Walter N



## **Alaska Trollers Association**

130 Seward #205  
Juneau, AK 99801  
(907) 586-9400 phone  
(907) 586-4473 fax

May 26, 2011

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

Dear Chairman Olson and Council Members:

I am writing on behalf of the Alaska Trollers Association (ATA) in support of the Council's preliminary preferred alternative to address Chinook bycatch in the Gulf of Alaska (GOA), which provides the tools to limit Chinook bycatch; identify stock composition and run timing of Chinook stocks present in the GOA; and, creates an incentive for trawlers and the agencies to find new ways to avoid Chinook stocks and reduce salmon bycatch.

ATA represents the interests of hook and line fishermen in Southeast Alaska who target Chinook, coho, and chum salmon. Much of the fleet also relies on halibut from areas 2C and 3A. With over 2,500 hand and power troll permits, trolling ranks among the largest fisheries in the state. Our fleet has a residency rate of 85% and trollers make up the majority of permit holders in nearly all Southeast Alaska communities. Roughly one of every 35 people in Southeast works on the back deck of a troll boat. When you add in gillnetters, seiners, anglers, guides, and subsistence users -- in addition to the processing and support sectors -- it quickly becomes apparent that healthy salmon runs are crucial to the economic and social well-being of our region and the state.

The Environmental Assessment broadly estimates the ex-vessel price of Chinook salmon to the state's commercial fisheries, but such averages mute the significance of this species to the troll industry. Chinook is one of our fleet's three target species and is far and away the most valuable. In 2006, trollers were paid roughly \$32 million ex-vessel, which was over 10% of the entire statewide salmon value; Alaska's general fund received an injection of nearly \$1 million in fisheries business tax revenue from the troll fishery alone. Chinook made up half of the fleet's earnings that year.

From 2009 to 2010 Chinook bycatch increased over 500% in the GOA. Our members believe it is essential that all efforts be made to expedite implementation of a hard cap and other measures to control bycatch. A cap of 22,500, based on an average that leaves out the highest years, seems reasonable and should help avoid the spikes in bycatch that concern fishermen who target Chinook salmon.

We appreciate that the Council thought to provide in the preferred alternative appropriate caps for any mid-year implementation of the rule. This should achieve the twin goals of controlling bycatch as soon as practicable and providing reasonable opportunity for the GOA trawl fisheries. This type of planning is particularly important given ongoing sacrifices being made by salmon fishermen from California to Alaska.

Since the mid-70s, Southeast Alaska fishermen have endured significant conservation restrictions to rebuild Chinook salmon from Alaska, British Columbia, and the Lower 48. The Pacific Salmon Treaty Chinook quota in Alaska still remains extremely low, contrary to promises made to the fleet that the treaty rebuilding program, combined with a fishermen's financed hatchery program, would restore harvest to more than 500,000 by year 2000. In 2010, and despite the fact that stocks are considered rebuilt in our fishery, the Southeast quota was the 7<sup>th</sup> lowest since Treaty signing and, at 221,800, was more than 40K less than the original Treaty rebuilding quota. The impact of low quotas in our region has been significant economic disruption of the troll fishery and

unnecessary tension and allocation disputes amongst fishermen. This year the Southeast quota is up, but still far below where it should be. Our region's target stocks are broadly dispersed in the North Pacific Ocean and Bering Sea.

Directed troll and gillnet fisheries for Taku and Stikine River Chinook will remain closed in 2011. Fortunately, those stocks are expected to achieve escapement, but the returns are projected to be too low to provide harvestable surpluses. These stocks return to spawn in the spring and are likely present in the North Pacific trawl fisheries.

Chinook in several other GOA areas are not meeting escapement objectives. Directed fisheries are experiencing dismal landings and early closures, causing ADFG to identify the Karluk River Chinook as a stock of concern (ADFG memo to Alaska Board of Fisheries, 9/30/2010). These stocks are likely to pass through GOA trawl fisheries at various stages of their life cycle.

The salmon stock identification studies envisioned under the proposed alternative should help to provide essential data on Chinook stock composition and run timing, which will help to better define the impacts of trawl bycatch on various stocks and salmon fisheries. It should also help improve trawl management, by providing the information necessary to craft practical options to help trawlers avoid Chinook salmon.

ATA strongly supports expanding observer coverage to smaller trawl vessels and improving sampling methodology and protocols onboard and at the dock. In fact, since salmon are known to be milling in the area, many of our members question a sampling rate of just 30% in the GOA. Salmon are important not only to Alaskan fishermen and processors, but also many other West Coast communities; consumers across the nation and world; and the general public, which has gone to great lengths and expense to conserve them. It does not seem unreasonable to get a more accurate handle on the impact of trawl bycatch and to develop the means to better control it.

ATA has long supported cooperative efforts between agencies and fishermen to develop and refine conservation based fishing strategies. Expanding mandatory information gathering, combined with a hard cap, will give some assurance to fleets like ours that Chinook bycatch will be dealt with in a meaningful way. Providing that assurance through reasonable incentives and accountability standards, versus draconian restrictions that may not address the problem, will also allow the trawl fleet some flexibility to find creative solutions to this problem.

In conclusion, ATA believes that a good long-term plan to reduce salmon bycatch can be developed. In the interim, we ask that emergency regulations be promulgated as soon as practicable. Additionally, relevant research and analyses should be initiated and/or expanded, to help answer the many outstanding questions about the nature of GOA trawl bycatch and what avenues exist to control and reduce it. We believe the Council's preferred alternative goes a long way towards accomplishing those goals. We encourage you to vote in support and forward the preferred alternative to the Secretary posthaste.

Thanks for your participation in the Council process. ATA appreciates your dedication and service to the nation's fisheries resources and fish dependent communities. If we can provide additional information, or otherwise be of assistance on this or other issues, please feel free to contact me.

Seasons Best!



Dale Kelley  
Executive Director

**Stakeholders of the Salmon Resource in the Gulf of Alaska  
Support Action to Reduce Chinook Bycatch**

May 31, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510

Governor Sean Parnell  
P.O. Box 11001  
Juneau, AK 99811

RE: Agenda item C-4 Final Action on GOA Chinook Salmon Bycatch in Pollock Fishery

Dear Chairman Olson and Governor Parnell,

We, the undersigned, **urge the North Pacific Fishery Management Council (NPFMC) to take final action in June to adopt a prohibited species catch (PSC) limit on Chinook salmon bycatch in Gulf of Alaska pollock trawl fisheries.**

**We support the preliminary preferred alternative (PPA) of a 22,500 hard cap selected by the NPFMC as a starting point to reduce Chinook salmon bycatch in the Gulf of Alaska.** While we feel that 15,000 is a more appropriate hard cap because it represents an actual reduction from historical averages, we support the PPA as an important—and long overdue—first step at placing limitations on the waste of Chinook salmon in the GOA pollock fishery. We support expanded observer coverage for trawl vessels which currently carry no observers and increased observer coverage for all pollock trawl vessels within the restructured observer program to increase confidence in the accuracy of the data. We support the requirement for 100% retention of all salmon species to provide additional data on which to base sound management decisions.

Chinook salmon are a vital and essential component of our communities, our cultures and our economies in the Gulf of Alaska.

Significant and unrestricted Chinook salmon bycatch has been occurring in the Gulf of Alaska for decades. This level of bycatch is unacceptable, particularly in a time in which many Gulf of Alaska salmon stocks are struggling, and puts undue hardship on Alaska's commercial, sport, recreational, personal use, and subsistence Chinook salmon harvesters. The time is now to address this issue by putting a meaningful limit on Chinook salmon bycatch in the pollock trawl fisheries.

Thank you.

## Stakeholders of the Salmon Resource in the Gulf of Alaska

First Name	Last Name	Street Address	City	State	Fisheries Interest
1 Kelly	Harrell	5701E. 104th Ave	Anchorage	AK	Sport & consumer
2 Martin	Schuster	2110 Yellowsnow Rd.	Fairbanks	AK	Concerned citizen
3 Pete	Wedin	P.O. Box 3353	Homer	AK	Sport fisherman & charter operator. Consumer of Chinook salmon
4 Jason	Weir	3501 Orbit circle	Anchorage	AK	Consumer, concerned citizen
5 Karlan	Bachmann	1150 Skyline Dr.	Fairbanks	AK	Concerned citizen and consumer of salmon
6 Jenna	Hertz	830 College Rd	Fairbanks	AK	Subsistence, concerned citizen
7 Carl	Wassilie	3724 Campbell Airstrip Rd	Anchorage	AK	Subsistence
8 Switgard	Duesterlo	P.O. Box 2787	Kodiak	AK	Concerned citizen, naturalist & marine science educator
9 Judith	Brakel	P.O. Box 94	Gustavs	AK	Personal use fishermen and concerned Alaska citizen
10 Callie	Williams	1664 Mt. Pleasant Rd.	Chesapeake	VA	Concerned citizen
11 Aaron	Kulas	P.O. Box 19351	Thorne Bay	AK	Commercial, subsistence, sport
12 Timothy	Evers	P.O. Box 39547	Ninilchik	AK	Sport
13 Katie	Kennedy	10145 Sunset	Ninilchik	AK	50 yr. resident of AK and very concerned
14 John	Rathert		Ninilchik	AK	Sport
15 Roger	Byerly	P.O. Box 508	Sterling	AK	Charter boat captain and owner of lodge on Kenai River
16 Gary W.	Buchman	2000 S Carr St.	Wasilla	AK	Sport
17 Melvin B.	Gillis	8131 Evans Circle	Anchorage	AK	Sport & commercial
18 Barry J.	Wright	P.O. Box 39328	Ninilchik	AK	Concerned citizen & sport fisherman
19 David S.	Skroch	18581 Ervin St.	Whitehall	WI	Consumer
20 Susan	Dionne-Kaffke	P.O. Box 39597	Ninilchik	AK	Sport fishing business
21 David M.	Hren	2538 Porter Place	Anchorage	AK	Sport
22 Mike	Hopley	P.O. Box 4273	Soldotna	AK	Charter fishing business, Alaskan Adventure Charters in Soldotna, AK
23 George	Pierce	P.O. Box 80	Kasilof	AK	Sport & personal use
24 Bruce H.	Butterwick	P.O. Box 471	Anchor Point	AK	Sport
25 John D.	Rathert Jr.	12041 Lugene Lane	Eagle River	AK	Sport
26 Mary	Starrs Armstrong	4084 Lupine Dr.	Kenai	AK	Sport fishers lovers and eaters of Kings
27 Dallas	Armstrong	4084 Lupine Dr.	Kenai	AK	Sport fishing on Kenai for 35 yrs
28 Derald J.	Carr	1741 E. Maryred Cir.	Wasilla	AK	Sport
29 Steve Charles	Northcutt	P.O. Box 672517	Chugiak	AK	Consumer & concerned citizen
30 John	Groundwater	P.O. Box 3306	Valdez	AK	Sport & concerned citizen
31 David	Kaffke	P.O. Box 39597	Ninilchik	AK	Local economy depends on Kings
32 John	Baker	P.O. Box 39388	Ninilchik	AK	Sport & consumer
33 Mel A.	Erickson	P.O. Box 1127	Soldotna	AK	King salmon fishing guide
34 Nina	Faust	P.O. Box 2994	Homer	AK	Consumer & concerned citizen
35 Charles T	Beck	P.O. Box 19106	Thorne Bay	AK	Quit killing the small herring
36 Amy	Snider	3724 Campbell Airstrip Rd	Anchorage	AK	Subsistence, concerned citizen
37 David R.	Scott	PO Box 3408	Homer	AK	Concerned citizen



## Stakeholders of the Salmon Resource in the Gulf of Alaska

38 James	Mulcare	1110 Benjamin St	Clarkston	WA	Concerned citizen
39 Gordon Steele	Davis	1111 Davis Cove	Kodiak	AK	Subsistence user living remote on the west side of Kodiak island
40 Mark R.	Miles M.D.	451 Wilcox Ave.	Fairbanks	AK	Sport Fisherman
41 Allen Lloyed	Clark	P.O. Box 2717	Kodiak	AK	Subsistence, Sport, Consumer
42 Charles P.	Peterson	1850 Three Sisters Way	Kodiak	AK	Commercial
43 Odin	Miller	Box 750241	Fairbanks	AK	Subsistence/informal economic exchange, sport, concerned citizen
44 James W.	Harrell Sr.	2916 Oak Haven Circle	Georgetown	TX	Sport fishing and consumer of Kings
45 Craig M.	Baker	P.O. Box 8514	Kodiak	AK	Sport fisherman and own a charter business
46 Jere	Smith	200 Allen	Leavenworth	KS	Sport consumer and concerned citizen
47 Kyle	Valerio	3533 Sharatin Road	Kodiak	AK	Sport
48 Marvin L.	Scarcello	7814 E. Skyline Dr.	Spokane Valley	WA	Sport fisherman/consumer
49 John	Oscar	PO Box 2420	Bethel	AK	Subsistence, consumer, concerned citizen and villager.
50 John A.	Rightor	311 Date Ave. #11	Sultan	WA	Sport fisherman, concerned citizen
51 Stephen P.	Glaholt Jr.	919 N. Orris Dr.	Bloomington	IN	Sport, concerned citizen
52 Bill	Bissett	305 Center Ave. #57	Kodiak	AK	Sport fishing
53 Carl	Seutter	2111 E Grizzly Bear Dr.	Wasilla	AK	Sport fishing, consumer, concerned citizen
54 Claudia	Anderson	PO Box 310	Kodiak	AK	Commercial fisher, I also subsistence and sport fish
55 Lawrence	Carroll	PO Box 704	Kodiak	AK	Sport, concerned citizen
56 Paul	Miller	3066 SW 153rd Drive	Beaverton	OR	Sport
57 Clifford	Ward	PO Box 264	Cordova	AK	Concerned citizen
58 Eric C.	Lian	PO Box 1025	Cordova	AK	Family heritage of more than four generations, subsistence fisheries on the Copper River Flats
59	Melvin	PO Box 520575	Big Lake	AK	While your at it cut the halibut by-catch in half as well.
60 Ron	Trosvig	9784 Cavell Cir	Bloomington	MN	Concerned citizen, have relatives in the commercial fishing industry
61 Chaz	Glagolich	P.O. Box 2826	Kodiak	AK	Charter boat owner/operator
62 Daniel	Lewis	6700 East Finger Lake Vw. Dr.	Wasilla	AK	Sport Fishing Guide
63 Amy	Fredette	3901 Harry Neilsen Ave	Kodiak	AK	Owner of Ayakulik Adventures, fly fishing lodge on Kodiak Island
64 Aaron	Kulas	PO Box 19351	Thorne Bay	AK	Commercial, subsistence and sport
65 Jeffery	Bassett	5000 East 98th Ave	Anchorage	AK	Commercial
66 Janis	Lucero	1576 Lupton Av.	San Jose	CA	Concerned citizen
67 Richard A.	Arduini Jr.	5587 Lochcarron Dr.	Marysville	CA	Sport, consumer, concerned citizen
68 David G.	Skroch	18581 Ervin St.	Whitehall	WI	Consumer
69 Jerry	Bongen	PO Box 392	Kodiak	AK	Commercial and sport
70 Connie	Whisenhunt	13974 Phoenix	Tyler	TX	Every year my husband and I spend two weeks in Alaska sport fishing Kings
71 Daniel	Glass	902 N. Koyukuk Dr.	Fairbanks	AK	SE AK commercial, sport, consumer
72 National Association of Charterboat Op	P.O. Box 2990		Orange Beach	AL	Charter boat industry
73 Dennis M.	Zadra	PO Box 2348	Cordova	AK	Commercial fisherman
74 Frank Patrick	Ingle	6998 Kenmare Dr.	Bloomington	MN	Sport, consumer
75 Linda J.	Lance	1338 Mountain View Drive	Kodiak	AK	Consumer and conservation-minded Alaskan

## Stakeholders of the Salmon Resource in the Gulf of Alaska

76 Ty Anderson	Wickline	6326 S. Millbrook Way	Aurora	CO	Commercial & Sport
77 John	Oscar	PO Box 2420	Bethel	AK	Subsistence and concerned citizen
78 Julia	Beaty	601 E 15th Terrace #19	Anchorage	AK	Consumer and concerned citizen
79 Chelsea	DeStefano	5808 Image Circle	Anchorage	AK	Concerned citizen, sport
80 Ryan M	Burt	1717 Mission Road	Kodiak	AK	Concerned citizen and sport fisherman
81 David	Kubiak	PO Box 193	Kodiak	AK	Subsistence
82 David L.	Allison	2012 Alto Vista Avenue	Gwynn Oak	MD	Consumer, former Alaskan, marine conservation advocate
83 Morris	Anderson	PO Box 2093	Kodiak	AK	Concerned citizen
84 Cynthia	Lopez	3754 Chaffee Circle	Anchorage	AK	Subsistence, sport and concerned citizen
85 Peter	Thompson	PO Box 3037	Kodiak	AK	Commercial, sport, and subsistence fisherman
86 Lisa	Mariotti	P.O. Box 20413	Juneau	AK	Commercial, subsistence, sport, consumer, concerned citizen
87 Rebecca	Bean-Mullan	PO Box 92	Kodiak	AK	Commercial fisherman/subsistence use/sport fisherman/consumer of Alaskan fish
88 Parry	Nelson	PO Box 92	Kodiak	AK	commercial fisherman/subsistence fisherman/sport fisherman/consumer of Alaskan fish
89 Norman	Mullan	PO Box 92	Kodiak	AK	commercial fisherman/subsistence fisherman/sport fisherman/consumer of Alaskan fish
90 Britta	Mullan	PO Box 92	Kodiak	AK	commercial fisherman/subsistence fisherman/sport fisherman/consumer of Alaskan fish
91 Chris	Lillo	P.O. box 67	Seldovia	AK	Subsistence, sport
92 Karen	Seater	314 CR 452	Breckenridge	CO	Commercial
93 Megan	Sharkey	4252 Reka Dr	Anchorage	AK	Concerned citizen
94 Kim	Hastings		Kupreanof	AK	Hand troller
95 Diane	Hirshberg	3813 Hampton Drive	Anchorage	AK	Sport, consumer, generally concerned citizen
96 Camrin	Dengel	7510 Foxridge Way #C	Anchorage	AK	Consumer, concerned citizen
97 Lexi	Fish	228 Lakeview Drive	Sitka	AK	Commercial fisherwoman, subsistence, consumer & concerned citizen!
98 Maureen	Knutsen	P.O. Box 134	Naknek	AK	Concerned citizen who also depends on commercial & subsistence salmon in Bristol Bay
99 Kathy	Smith	PO Box 3099	Homer	AK	Sport, subsistence, concerned citizen
100 Steve	Lewis	2606 west 30th ave	Anchorage	AK	Concerned citizen
101 Paula	Williams	1910 Shadetree Circle	Anchorage	AK	Sport fisherperson and concerned citizen
102 Zach	LaPerriere	2212 Sawmill Creek Road	Sitka	AK	Commercial, sport
103 Rebecca	Nelson	PO Box 3086	Kodiak	AK	Commercial, subsistence, sport
104 Colleen Mae	Rankin	Box kpr port william	Kodiak	AK	Sport, concerned citizen, subsistence
105 Robert	Bonanno	4552 Wildcat Circle	Antioch	CA	Commercial
106 Susan	Goldhor	Studies,45B Museum Street	Cambridge	MA	Biologist, have worked in Alaska both with pollock and salmon
107 Michelle	LaFriniere	PO Box 2186	Homer	AK	Commercial fisher, concerned citizen
108 Brian	Cheledinas	260 Kodiak Rd.	Selah	WA	Commercial. consumer, concerned citizen
109 Arthur	Bloom	W Tenakee Ave	Tenakee Springs	AK	Concerned citizen
110 Christopher	Fiala	1315 larch street	Kodiak	AK	Sport charter
111 Scott	Hed	713 S Holt Avenue	Sioux Falls	SD	Sport fishing and consumer
112 Brian	Himelbloom	P.O. Box 1866	Kodiak	AK	Commercial, subsistence, sport, consumer, concerned citizen
113 Stosh	Anderson	3964 Cliffside	Kodiak	AK	Commercial, sport, concerned citizen

## Stakeholders of the Salmon Resource in the Gulf of Alaska

114 Kathryn	Adkins	PO Box 50	Kodiak	AK	Sport, Consumer, Subsistence
115 Stephen	Davis	342 E. Dowling Rd.	Anchorage	AK	
116 Lows	Edenshaw	PO Box 571	Kotzebue	AK	Lana Lynn
117 Bryane	Eekroth	3521 Cutlass Circle	Anchorage	AK	Sport
118 Sarah	Spindler	PO Box 242373	Anchorage	AK	Sporting goods/sport fishing
119 Chad W.	Smith	3005 W. 30th Ave. #8	Anchorage	AK	Sporting goods/sport fishing
120 Leonardo	Wassilie	3724 Campbell Airstrip Rd	Anchorage	AK	Dipnet/subsistence
121 Carol	Dubay	9141 Peck Ave.	Anchorage	AK	Subsistence
122 Barabra	Kanehailua	PO Box 211213	Anchorage	AK	
123 Nicolette	Pastos	c/o/ 8101 Peck Ave.	Anchorage	AK	Subsistence/cultural preservation
124 Nikos	Pastos	8101 Peck Ave.	Anchorage	AK	Subsistence/cultural preservation/dipnetting
125 GF	Kennedy	PO Box 66	Port Lions	AK	lodge owner
126 Carl	Sholl	3346 Antone Way	Kodiak	AK	Salmon seiner, F/V Sumner Strait, F/V Ceciel Marie
127 Kelly	Longrich	PO Box 2677	Kodiak	AK	F/V Shuyak
128 Shelly	Lawson	1717 Mission Rd.	Kodiak	AK	Eater of salmon
129 Adrian	Segalla	733 N St.	Anchorage	AK	Observer
130 David	Pearmain	733 N St.	Anchorage	AK	Observer
131 Stanley	Green		Bethel	AK	Eating it
132 Douglas	Parker		Lake Oswego	OR	Appreciating its intrinsic & economic value
133 Audrey	Gallagher		Anchorage	AK	Appreciating it!
134 Susie	Doll	8160 Evans Circle	Anchorage	AK	Eating & appreciating it!
135 Jesse	Lanman		Chickaloon	AK	FOOD
136 Earl	Kingik	3240 Penland Parkway # 20	Anchorage	AK	Subsistence user of King salmon
137 Delice	Calcote	PO Box 248	Sutton	AK	Subsistence use of King salmon
138 Trevor	Clayton	7710 Lamt St.	Anchorage	AK	Subsistence
139 Ken	Zafren	10181 Curvi St.	Anchorage	AK	Concerned Citizen
140 George C.	Wilson	PO Box 202	Naknek	AK	Commercial Fisherman, subsistence user and sport fisherman in the Naknek and Kvichak drainages
141 Patrick J.	Pikus	PO Box 2843	Kodiak	AK	I am a commercial fisherman and I fish salmon in the Kodiak area
142 Rod Van	Saun	PO Box 39622	Ninilchik	AK	Sport, consumer, concerned citizen
143 Don S.	Dumm	PO Box 1723	Kodiak	AK	Commercial, sport and concerned citizen
144 Debra	Kennedy	P O Box 66	Port Lions	AK	Sport charter
145 Ronald G	Thompson	P.O. BOX 567	Kodiak	AK	Commercial Salmon Tender operator, Retail marketer
146 Deana	Pikus	PO Box 2843	Kodiak	AK	I am a wife of a commercial fisherman
147 Cynthia	Morelli	PO Box 1465	Homer	AK	Commercial, subsistence, consumer, concerned citizen
148 Jackie	Muller	PO Box 46	ouzinkie	AK	Subsistence
149 Melvin D.	Squartsoff	PO Box 70	Port Lions	AK	Charter Boat Captain
150 Dennis Gerrit	Hintz	PO Box 34	Port Lions	AK	Sport Charter Business Owner
151 Richard	Stockwell	24275 Hill	Warren		Observer of Observers

## Stakeholders of the Salmon Resource in the Gulf of Alaska

152 Rebecca	Dorff	411 Willow Rd.	Kodiak	AK	Observer
153 Ann	England	411 Willow Rd.	Kodiak	AK	Observer
154 Yvonne	Schofield Cleary	3946 Cliffside	Kodiak	AK	Concern for natural resources and our relationship with them
155 Benjamin	Newton	36935 Spruce Circle Road	Anchor Point	AK	F/V Point Omega
156 William	Eoff	1254 Sargent Creek Rd	Kodiak	AK	Owner/Operator
157 George	Kirk		Kodiak	AK	F/V Arctic Wave, salmon
158 Ryan	Vickstrom	PO Box 3133	Kodiak	AK	Arctic Wave crewman
159 Ed	Hernnadez	PO Box 817	Avalon	CA	Arctic Wave crew
160 Steve	Smith	PO Box 9050	Kodiak	AK	Sport fish
161 Jordan	Fogle	2317 Three Sisters Way	Kodiak	AK	F/V Invincible
162 Ric	Chamberlin	510 Mozart Circle	Kodiak	AK	Music Teacher
163 Mike	York	516 Mozart	Kodiak	AK	Sport Fishing
164 Lauri	Bassett	5000 E 98th Av	Anchorage	AK	Set Netter
165 Zach	Bassett	5000 E 98th Av	Anchorage	AK	Set Netter
166 Dawn	Black	PO Box 1912	Kodiak	AK	Local Resident, Fisherpersion
167 Pat	Costello	3515 Eider Street	Kodiak	AK	Teacher/youth supervisor
168 Jeanine	Costello	3515 Eider Street	Kodiak	AK	Teacher
169 Tyler	Randolph	1515 A. Mill Bay Rd.	Kodiak	AK	Insurance
170 Carrie	Randolph	1515 A. Mill Bay Rd.	Kodiak	AK	Dentist
171 Lewis	Kendrick	PO Box 255	Kodiak	AK	Bristol Bay gill net
172 Terry	Haines	724 Hillside	Kodiak	AK	deckhand
173 Allen	Christiansen	Box 134	Old Harbor	AK	Allen's Fish Service
174 Lorie	Mann		Kodiak	AK	mother of commercial fishermen
175 Dane	Butler	1108 Madsen	Kodiak	AK	
176 Kelvin	Skonberg	Box 2626	Kodiak	AK	sport
177 Terry	Cratty	1741 Lore Rd #3	Anchorage	AK	sport
178 David	Carson	3629 E. Rezanof Dr #43	Kodiak	AK	Subsistence, Sport
179 Donald	Kewan Jr.	214 Malina Street	Port Lions	AK	sport/charter
180 Harry	Nelson	Box 87	Port Lions	AK	sport
181 David	Horne	450 Teal Way	Kodiak	AK	sport fisherman/science teacher
182 Frederick R.	Deveau Jr.	514 Upper Mill Bay Rd. Apt. 11	Kodiak	AK	
183 P. Michael	Downing	1310 Madsen Ave	Kodiak	AK	Retired, Sport fisherman
184 Robert J.	Hoedel		Kodiak	AK	commercial fisherman
185 Douglas	Hogen	3099 Spruce Cape Rd.	Kodiak	AK	contractor
186 David	Hansen	PO Box 2696	Kodiak	AK	Contender
187 Pete	Hannah	Box 1803	Kodiak	AK	Mikado
188 Shawn	Dochtermann	PO Box 866	Kodiak	AK	F/V Isanofski
189 Marilyn	Bell	PO Box 2724	Kodiak	AK	F/V Adiz

## Stakeholders of the Salmon Resource in the Gulf of Alaska

190 Jack E.	Mann	PO Box 245	Kodiak	AK	Sport Fishing
191 Robert F	Casey	2921 A Mill Bay Rd.	Kodiak	AK	Sport fishing
192 Suzanne	Abraham	PO Box 511	Kodiak	AK	Commercial Fish and medical
193 Mary Ann	Hickey	PO Box 1907	Kodiak	AK	Commercial Fish
194 Michelle	Weekly	11542 Women Bay Dr.	Kodiak	AK	Halibut fisherman
195 Debra	Nielsen	Box 8381	Kodiak	AK	Former salmon permit holder
196 Deborah	McCusker	2561 Beaver Lake Dr.	Kodiak	AK	Sport fishing
197 Dennis	McCusker	2561 Beaver Lake Dr.	Kodiak	AK	Sport fishing
198 Zachary Traverse	Vargo	12117 Gara Rd.	Kodiak	AK	Sport fishing
199 Sadie	Meansher	12117 Gara Rd.	Kodiak	AK	Sport fishing
200 Freya	Holm Lhotka	12756 Noch Dr.	Kodiak	AK	teacher
201 Margaret	O'Leary	PO Box 2016	Kodiak	AK	teacher
202 Jane	Regan	PO Box 3310	Homer	AK	retired
203 Robert	Werner	6961 Rabbit Circles Rd.		AK	Barrelege
204 Emily	Waters	1320 Mission Rd	Kodiak	AK	Teacher
205 Rosenda	Delacruz	PO Box 8671	Kodiak	AK	RDA
206 Laura L.	Johnson	PO Box 526	Kodiak	AK	
207 Linda	Laree	1338 Mountain View	Kodiak	AK	healthcare
208 John	Eaton	4093 Parkside Dr./ PO Box 8745	Kodiak	AK	USCG
209 Jon	Corriveau	5512 17th Ave. NW	Seattle	WA	Salmon buyer
210 Richard	Blackwell	PO Box 2026	Kodiak	AK	Subsistence, Sport
211 Anna	Miller	PO Box 2037	Kodiak	AK	father and partner are commercial fishermen
212 Aaron	Ridel	PO Box 1156	Anchor Point	AK	F/V Anna D
213 Em	Schercla	PO Box 8371	Kodiak	AK	Utilitas
214 Robert	Waltor	Box 8778	Kodiak	AK	Bearing Hunter, Shore support
215 Mary	Forbes	418 Mill Bay Rd.	Kodiak	AK	concerned citizen
216 Jeff	Stephan	PO Box 2917	Kodiak	AK	UFMA
217 Stephen	Taufen	PO Box 714	Kodiak	AK	Groundswell Fisheries Movement
218 Jacob	Bassett	5000 East 98th Ave	Anchorage	AK	Setnetter
219 Jeff	Bassett	5000 East 98th Ave	Anchorage	AK	Setnetter
220 Benjamin	Millstein	523 Leta St.	Kodiak	AK	Brewer/Community Member
221 Elizabeth	West	1814 E. Rezanof	Kodiak	AK	Former Commercial Fisherman
222 Raymond	May	PO Box 8985	Kodiak	AK	F/V Northwestern, seining
223 Brian	Young	PO Box 806	Kodiak	AK	Young Fisheries
224 Donald	Fox	2251 Three Sisters Way	Kodiak	AK	retired fishermen
225 Margaret	Bosworth	PO Box 1803	Kodiak	AK	set net fisherman
226 Alexis	Kwachka	326 Cope St.	Kodiak	AK	salmon fisherman
227 Geoff	Smith	12816 Noch Drive	Kodiak	AK	cabin fever sport fish

## Stakeholders of the Salmon Resource in the Gulf of Alaska

228 Aaron	Johnson	4634 Cliffside Dr.	Kodiak	AK	F/V Kathryn, crewmember
229 Thorvold	Olsen	PO Box 322	Kodiak	AK	F/V Viking Star, Owner, fishermen
230 Raye Ann	Neustal	430 W. 21st	Anchorage	AK	State
231 Ryan	Fields	PO Box 1691	Kodiak	AK	crewmember
232 Don	Roberts	264 Lily Dr. Apt. C2	Kodiak	AK	Citizen
233 Willie	Nelson	PO Box 87	Port Lions	AK	Sport
234 Arthur	May	PO Box 32	Port Lions	AK	Sport
235 Jim	Andie	1619 Airport Way	Kodiak	AK	Sport
236 David	Moore	PO Box 2173	Homer	AK	Sport
237 James	Crawford	PO Box 2686	Kodiak	AK	Sport
238 Kathryn	Reft	PO Box 13	Karluk	AK	Subsistence Use
239 Greg	Wallace	PO Box 2	Ouzinkie	AK	F/V Silver Knight, salmon fisherman
240 Karen	Millstein	523 Leta St.	Kodiak	AK	Live in community, subsistence
241 Laura	Hansen	11147 Womens Bay Drive	Kodiak	AK	School teacher KIBSD
242 Michelle	St. Clair	PO Box 8786	Kodiak	AK	School teacher KIBSD
243 Theresa	Peterson	1850 Three Sisters Way	Kodiak	AK	Commercial salmon setnetter
244 Mackenzie	Peterson	1850 Three Sisters Way	Kodiak	AK	Commercial salmon setnetter
245 Charles M.	Peterson	1850 Three Sisters Way	Kodiak	AK	Commercial salmon seiner
246 Charlie	Powers	PO Box 2291	Kodiak	AK	Commercial Fish/ Post Sport Fish Guide
247 Will	Anderson	4152 Parkside Dr.	Kodiak	AK	Sport Fish
248 Chuck	Reft	3320 Balika Lane	Kodiak	AK	Sport Fish
249 Andy	Christofferson	1516 East Rezanof	Kodiak	AK	Sport Fish
250 Glenn	Yngve	1820 Mission Rd.	Kodiak	AK	F/V Kahuna/salmon
251 Kim	Holmes	1313 Mylar #24	Kodiak	AK	
252 Fred	Katelnikoff	PO Box 731	Kodiak	AK	Sport Fish
253 Hubert	Vinberg	PO Box 78	Kodiak	AK	Sport Fish/Subsistence
254 Christopher	Dolph	547 Carroll Way	Kodiak	AK	Subsistence/Sport
255 Melinda	Cortez	PO Box 8605	Kodiak	AK	Subsistence
256 Brandi	Wagner	PO Box 1605	Kodiak	AK	Subsistence
257 Wanda	Harris	PO Box	Kodiak	AK	Subsistence
258 Cecil	Sholl	PO Box 681	Kodiak	AK	Subsistence
259 Brian	O'Leary	4044 Cliffside	Kodiak	AK	F/V Kodiak Isle
260 Stan	Duncan	PO Box 639	Kodiak	AK	F/V Kloody
261 Kaley	Wallace	12593 Noch Dr.	Kodiak	AK	Old Powerhouse Restaurant
262 Jay	Johnson	PO Box 433	Kodiak	AK	Construction
263 Daniel	Malley	PO Box 9012	Kodiak	AK	Construction
264 Zora	Inga	PO Box 112	Old Harbor	AK	Sport
265 Rory	Brambaugh	2920 E. Beech Way	Wasilla	AK	Sport

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266 Sylvester	Sanchez	2015A Aviation Loop	Kodiak	AK	Sport
267 Pam	Skonberg	PO Box 153	Kodiak	AK	Sport
268 Antonia	DeLucia	PO Box 1517	Kodiak	AK	Commercial
269 Kathy	Powers	3989 Woodland Dr.	Kodiak	AK	Teacher
270 Sonya	Mejjati	PO Box 2428	Kodiak	AK	concerned citizen
271 Melinda	Boshee	PO Box 8567	Kodiak	AK	Librarian
272 Dan	McFarland	PO Box 8632	Kodiak	AK	F/V Dancia
273 Allen	Huling	216 Murphy Way	Kodiak	AK	Concerned citizen/Power utility
274 Conrad	Peterson	PO Box 29	Old Harbor	AK	Sport
275 Nikkia	Atkins	PO Box 155	Old Harbor	AK	Sport
276 Jason	Dusel	1351 W. 70th	Anchorage	AK	Sport
277 Melvin	Squartsoff	PO Box 70	Port Lions	AK	Charter/Lodge Owner
278 Martin	Inga Jr.	PO Box 112	Old Harbor	AK	Sport
279 Tom	Anthony	2032 Island Circle	Kodiak	AK	Natural Resource Management
280 Justin	Wholey	512 E. 24th Ave Apt. B	Anchorage	AK	AK DNR trail mapper/recreational fisherman
281 Mike	Patitucci	PO Box 1511	Kodiak	AK	F/V Denise Marie/Commercial salmon
282 Keith	Moore	C/O Island Seafood	Kodiak	AK	Salmon setnet
283 Sean	Moore	C/O Island Seafood	Kodiak	AK	Salmon setnet
284 Joseph	Williams		Kodiak	AK	Fisherman
285 Jaclyn	Martin		Kodiak	AK	Fisherman
286 Alexandra	Oliveira	118 Trident Way	Kodiak	AK	Researcher, University of Alaska
287 Theresa	Baker	PO Box 8514	Kodiak	AK	Interest
288 Tad	Wellman	370 Curlew Way	Kodiak	AK	Sport Fisher
289 Bear	Becker	PO Box 2163	Kodiak	AK	Employee of City
290 Robert	Munsey	137 Timberlake	Heber City	UT	Fisherman
291 Lisa	Frederic	Box 1	Denali Park	AK	Self employed
292 Anitra	Winkler	PO Box 85	Cantwell	AK	Fisher
293 David	Little	PO Box KWP	Kodiak	AK	Fisher
294 Jose A.	Polando	PO Box 2709	Kodiak	AK	Hunting guide/fishing
295 James D.	Jones	PO Box 8571	Kodiak	AK	Sport Fishing Guide
296 Charles R	Pearman	PO Box 8782	Kodiak	AK	Charter Vessel Operator
297 Robin	Kiely	1315 Larch St.	Kodiak	AK	Consumer - I like to eat
298 Melania	DeLucia	1815 Mission Rd.	Kodiak	AK	Part time commercial fisherman
299 Herta	Tschersich	1423 Baranof	Kodiak	AK	Concerned citizen
300 Kim	Almandnuss	111A Polarus Ave	Kodiak	AK	Concerned citizen
301 Nahshan	Almandnuss	111A Polarus Ave	Kodiak	AK	Recreational fisher
302 Stephanie	Hurst	3548 Sitkinak Dr.	Kodiak	AK	Concerned citizen
303 Ian	Hurst	3548 Sitkinak Dr.	Kodiak	AK	Concerned citizen

## Stakeholders of the Salmon Resource in the Gulf of Alaska

304 Karl	Berggren Jr.	PO Box 2079	Kodiak	AK	Citizen/angler/sporting goods clerk
305 Lelea	Seymour	PO Box 283	Cordova	AK	Concerned citizen
306 Dale	Christofferson	PO Box 1219	Kodiak	AK	F/V Alaska Challenger
307 Al	Cratty IV	3235 Katmai	Kodiak	AK	F/V M. Dawn
308 Benay	Eagan	3478 Tona Lane Apt#A	Kodiak	AK	Citizen concerned about salmon
309 Caroline	Goodman	101D Polarus Ave	Kodiak	AK	Concerned citizen and lover of salmon
310 Scott	Williams	3378 Spruce Cape Road	Kodiak	AK	Concerned citizen
311 Leon	Henderson	12906 Noch Dr.	Kodiak	AK	Navigator USCG
312 Bobbi	Hutcherson	1010 Sargent Creek	Kodiak	AK	Concerned citizen
313 James	Jackson	12849 Noch Dr.	Kodiak	AK	Concerned citizen
314 Karl	McLaughlin	PO Box 2578	Kodiak	AK	Concerned sport fisherman
315 Nate	Hatfield	PO Box 8556	Kodiak	AK	Fish lover
316 Para	Upchurch	11465 S. Russian Creek Rd. #4	Kodiak	AK	USCG
317 Erik E.	Hanson	11147 Womens Bay Drive	Kodiak	AK	Teacher
318 Nicole	Sherman	3340 Melitsa	Kodiak	AK	Teacher
319 Melissa	Temple	2295 Sorbus Way	Anchorage	AK	Engineer, DOT
320 Max	Smiley	PO Box 1522	Kodiak	AK	1 Fish
321 Anthony	DeLuca	2798 Manchester Ave.	Orange Park	FL	F/V Agnis Sabine, salmon deckhand
322 James	Coffman	1540 Graduation Lane	Middleburg	FL	F/V Agnis Sabine, salmon deckhand
323 Robert	Fellows	PO Box 1454	Homer	AK	F/V Valkyrie
324 Jamie	Grady	PO Box 1454	Homer	AK	F/V Valkyrie
325 Zachary	Hill	8615 Comorant Cove	Anchorage	AK	F/V Agave, fishermen
326 Mason		54545 East End Rd.	Homer	AK	F/V Valkyrie
327 Alex	Ferdinand	5 Tok Ave.	Homer	AK	F/V Agave
328 Shea	Long	330 Seaquail	Kodiak	AK	F/V Gallant Girl
329 Kathi	Voetmann	22033 Lakeview Dr.	Eagle River	AK	Longshoreman
330 Winton	Voetmann	22033 Lakeview Dr.	Eagle River	AK	Personal Use
331 Charlie	Johnson	1818 Mission Rd	Kodiak	AK	Sport
332 Luke	Lester	PO Box 553	Kodiak	AK	F/V Raging Beauty, seine salmon-herring, Tanner crab
333 Michael	Oliver	PO Box 1868	Kodiak	AK	Sport Fisherman
334 Max	Froysland	PO Box 3258	Kodiak	AK	salmon fisherman
335 Pete	Wedin	P. O. Box 3353	Homer	AK	"Julia Lynn" Charter
336 Debra	Wedin	P. O. Box 3353	Homer	AK	Julia Lynn Charter
337 Michael	Szocinski	436 Bonanza Ave.	Homer	AK	Seafood Processor
338 Bernadine	Jagelski	P. O. Box 2488	Homer	AK	Fish Administrator
339 Lisa	Yingling	P. O. Box 218	Seldovia	AK	Fisher
340 Pat	Schneider	P. O. Box 667	Homer	AK	Sport Fisherman
341 Gary	Handrich	36460 Full Curl Road	Homer	AK	Sport



## Stakeholders of the Salmon Resource in the Gulf of Alaska

342 Shawn	Patterson	P. O. Box 8975	Homer	AK	C/V Cuda/www.woodlandlodging.com
343 Laura	Pomeroy	P. O. Box 3547	Homer	AK	Fish Retailer
344 Rebecca	Clarke	P. O. Box 3038	Homer	AK	Fish Processor
345 Shelley	Gill	P. O. Box 2364	Homer	AK	Whale Researcher
346 Roark	Brown	210 Island View Ct.	Homer	AK	Charter
347 Jeff	Warner	5025 Seton Circle	Anchorage	AK	Sport
348 Clyde	Marpe	2025 E 34th Ave.	Spokane	WA	Sport
349 Norm	Anderson	4400 Rogers Loop Rd.	Homer	AK	F/V Sea Otter Charter Operator
350 Phil	Warren	P. O. Box 4	Homer	AK	Charter Operator
351 Joe	Svymbersky	Box 15322	Fritz Creek	AK	Pacific Sun Charter Operator
352 Molly	Brann	P. O. Box 1901	Homer	AK	Sport Fishing
353 Dave	Brann	P. O. Box 1901	Homer	AK	Sport Fishing
354 Bob	Shavelson	P. O. Box 1498	Homer	AK	Inletkeeper
355 George	Overpeck	P. O. Box 818	Homer	AK	Commercial/Sport
356 John B.	Phillips	P. O. Box 49-2545	Kenai	AK	Nauti Lady Boat Captain
357 Michael	Hiller	2141 Frisbee Ct.	Homer	AK	Chef
358 Jessica	Knox	3331 Kachemak Dr.	Homer	AK	Food & Beverage
359 Zachary Hixson	Brannon	4306 Homer Spit Rd	Homer	AK	Fish Processing
360 Spring	Morehouse	4306 Homer Spit Rd	Homer	AK	Fish Processing
361 Weldon	Chivers	4025 Homer Spit Rd.	Homer	AK	Fishing
362 April	Orleans		Homer	AK	Cook
363 Doug	Van Patten	P. O. Box 1348	Homer	AK	Bronze Lady
364 Hal	Smith	PO Box 869	Homer	AK	S/V Naktikos
365 Joe	Whittleberry	PO Box 2181	Homer	AK	Electrician
366 Wayne	Butler		Homer	AK	Lo Lo Won
367 Marilyn R.	Wagner	PO Box 84	Port Lions	AK	Charter Operator
368 Rodney	Knagin	PO Box 46	Port Lions	AK	
369 Eryk	Cranford	6351 Bishop Drive	Wasilla	AK	Shareholder
370 Marlene	Gunderson	PO Box 82	Port Lions	AK	
371 Susan	Boskofsky	PO Box 103	Port Lions	AK	Subsistence
372 Thomas	Hagberg	P. O. Box 175	Anchor Point	AK	Sockeye Charter
373 Tony	Demichele	P. O. Box 3557	Homer	AK	Salmon Sport Charter
374 Max	McNett	912 Shaw Rd.	Bellingham	WA	Commercial Fisherman/Makai
375 Dorothy	Wozniak	P. O. Box 1076	Homer	AK	Consuming
376 Daniel	Donich	P. O. Box 918	Homer	AK	Guide
377 Marvin	Nelson	P. O. Box 76	Port Lions	AK	Sport Fish Charter
378 Nick	Nelson	P. O. Box 74	Port Lions	AK	Sport Fishing
379 Harold	Christiansen Jr.	P. O. Box 61	Port Lions	AK	Commercial Fishing Salmon

## Stakeholders of the Salmon Resource in the Gulf of Alaska

380 Pete	Squartsoff	P. O. Box 63	Port Lions	AK	Retired All Fisheries
381 Bert	Bendixen	P. O. Box 77	Port Lions	AK	Commercial Fishing Salmon
382 Judith	Clayton	P. O. Box 40	Port Lions	AK	Librarian/B&B Owner/Subsistence Personal Interest
383 Angel	Sanders	P. O. Box 40	Port Lions	AK	Personal Interest
384 Kevin	Adkins	P. O. Box 50	Port Lions	AK	CHP Holder/Subsistence User/Rational Alaska Resident
385 Cassey	Rowland	P. O. Box 78	Port Lions	AK	Subsistence
386 Candace	Nelson	P. O. Box 77	Port Lions	AK	Subsistence/Fishing Family
387 Jeffrey T	Lee	P. O. Box 44	Seldovia	AK	Fisherman/Shareholder
388 Joe	Whitteberry	P. O. Box 2181	Homer	AK	
389 Jordon	Covarrubias	P. O. Box 47	Port Lions	AK	Fisherman/Rebecca Rae
390 Donald	Green	P. O. Box 68	Port Lions	AK	Fisherman
391 Steve	Andresen	P. O. Box 65	Port Lions	AK	Charter Fishing Business
392 Brad	Ames	P. O. Box 33	Port Lions	AK	"FV Vixen" Personal Interest
393 Katy	Adkins	P. O. Box 50	Port Lions	AK	City Clerk/Subsistence/Personal Use Sport Fisherman
394 Julie	Kaiser	P. O. Box 78	Port Lions	AK	Behavioral Health Subsistence Use Commercial Sport Fishing
395 Barbara	Nestic	P. O. Box 88	Port Lions	AK	Alutiiq Language Assistant
396 Marvin	Bartleson Sr.	P. O. Box 71	Port Lions	AK	Vessel
397 Sergay	Sheratine	P. O. Box 14	Pilot Station	AK	Vessel Owner
398 Marvin	Bartleson Jr.	P. O. Box 21	Port Lions	AK	Fisherman
399 Arnold	Kewan	Box 481	Port Lions	AK	Vessel
400 Russell	Gunderson	P Box 82	Port Lions	AK	Harbormaster
401 Charles	Kramer	PO Box 83	Port Lions	AK	Commercial Salmon Kodiak
402 Georgia R	Kramer	PO Box 83	Port Lions	AK	Salmon Crew Kodiak
403 Yvonne	Lukin	PO Box 10	Port Lions	AK	Subsistence
404 Alvin	Mullan	PO Box 10	Port Lions	AK	Subsistence
405 Rich	Pestrikoff	PO Box 9	Port Lions	AK	Subsistence
406 Brodean	Eggers	P. O. Box 32	Port Lions	AK	Hunny Bunny Sport City Employee
407 Kyle	Buschke	P. O. Box 66	Port Lions	AK	City Roads Foreman Sport
408 Kathy	Nelson	P. O. Box 87	Port Lions	AK	Bookkeeper/F/V Anna Lisa/F/V Helen Dell ALPP NVRL
409 Dorinda	Kewan	P. O. Box 81	Port Lions	AK	Fisherman's Wife/Subsistence Sport
410 Amanda	Squartsoff	P. O. Box 42	Port Lions	AK	Environmental Specialist
411 Arnold	Kewan	P. O. Box 81	Port Lions	AK	Gill Netter/Sportsfish/Subsistence
412 Candida	Squartsoff	P. O. Box 42	Port Lions	AK	Subsistence
413 Melvin	Squartsoff	P. O. Box 70	Port Lions	AK	Charter/Lodge Owner
414 James	Pennington	P. O. Box 93	Port Lions	AK	Charter/Sport Fish/Subsistence
415 Elizabeth	Pennington	P. O. Box 93	Port Lions	AK	Sportfish/Subsistence
416 Bryce	Donich	P. O. Box 918	Homer	AK	Optimist Sportfish
417 Wylie	Donich	P. O. Box 918	Homer	AK	Guide

## Stakeholders of the Salmon Resource in the Gulf of Alaska

418 Chris	Donich	P. O. Box 918	Homer	AK	Optimist Sportfish
419 Eric	Lehm	905 Wright St.	Fenwick Island	DE	Storm Petril
420 Sterling	Gillon	137 E. Danview	Homer	AK	Professional Chef
421 Kirby	Houchin	280 Arlington Ct.	Soldotna	AK	Fisherman
422 Harry	Temple	41860 Eastholz Ave.	Soldotna	AK	Fisherman
423 Caleb	Smith	P. O. Box 1021	Kasilof	AK	Salmon Fisherman
424 Bob	Smith	P. O. Box 261	Kasilof	AK	Salmon Fisherman
425 Steve	Russell	P. O. Box 261	Kenai	AK	Environmental
426 Theodore	Eyraud	P. O. Box 877914	Wasilla	AK	RN & AK resident & sport fisherman
427 Patricia	Gillam	P. O. Box 15353	Fritz Creek	AK	Resident
428 John	Gillam	P. O. Box 15353	Fritz Creek	AK	Resident
429 Christopher	Parrish	109 Cozy Cove Dr.	Homer	AK	Resident
430 Nicole	Griffin	57590 Windsor Ct.	Homer	AK	Resident
431 John W.	Torrence	Box 97	Seldovia	AK	Personal Use Fisheries
432 Darlene	Hildebrand	Box 4311	Homer	AK	Lover of Nature including Fish
433 Susanne	Wilson	P. O. Box 136	Homer	AK	Concern for Marine Environment & Protection of our Fisheries
434 Anna	Meredith	64880 Diamond Ridge Rd.	Homer	AK	Fished out of Adak
435 Nancy	Eyrund	P. O. Box 877914	Wasilla	AK	RN & AK resident!
436 Jason	Bradley	Windjammer Hotel	Homer	AK	Subsistence
437 John	Mario	P. O. Box 5023	Anchor Point	AK	Commercial Set Net, Personal Use, Dip Net Sportfisher
438 Erik	Pallizzer	1535 F. St.	Anchorage	AK	Cook Inlet Keeper Marine Debris Removal Sportfisher
439 Winslow	Hoffman	P. O. Box 1842	Homer	AK	Consumer
440 Andrew	Pollak	P. O. Box 146	Homer	AK	Sport Fishing
441 Maya	Rohr	P. O. Box 2621	Homer	AK	F/V Mr. Sea Dillingham AK Commercial Fisherman
442 Bjorn	Olson	P. O. Box 237	Homer	AK	Subsistence
443 Olga Von Ziegesar	Matkin	P. O. Box 15191	Fritz Creek	AK	Whale One Eye of the Whale
444 Kimberlee	McNett	P. O. Box 237	Homer	AK	Subsistence
445 Bradley	Kloeckl	P. O. Box 2132	Homer	AK	A Citizen Priority - subsistence
446 Casey	Bauer	6714 Holly Ln.	Anchorage	AK	Affinity for the dying traditions of native Alaskans
447 Albert	Arakelian	P. O. Box 1014	Homer	AK	Fisherman/Captain
448 Rene	LeMay	5355 N. Heidi	Palmer	AK	AK Resident interested in King Salmon
449 Dave	Seaman	P. O. Box RDO	Homer	AK	M/V Adenalte boat builder/ex fisherman
450 Robin	Leighty	P. O. Box 91865	Anchorage	AK	Consumer
451 Sera	Baxter	P. O. Box 182	Seldovia	AK	Commercial Fisher graduate biologist
452 Jessie	Edson	P. O. Box 3401	Homer	AK	F/V Kupreanof Sitka AK
453 Dana	Guidi	57843 Blueberry Glen Ct.	Homer	AK	Concerned Citizen
454 Sharon	Whytel	Box 1529	Homer	AK	I Like to Eat
455 Art	Shuht	P. O. Box 4294	Homer	AK	Thunderfish

## Stakeholders of the Salmon Resource in the Gulf of Alaska

456 Ian	Dorman	2205 Eureka St. Apt 348	Anchorage	AK	Fishmonger
457 James	Lunny	326 Ocean Dr. Loop	Homer	AK	Carpenter/Longline Fishery Primary source of protein Salmon
458 Terri	Carter	42250 Salamatof	Soldotna	AK	Life Long Resident
459 John	Carter	42250 Salamatof	Soldotna	AK	King Salmon Survival
460 Lizz	Berven	8531 Peck	Anchorage	AK	"Alaskan"
461 Lucinda	Sidlinger		Halibut Cove	AK	Oyster Farmer/Lodge Owner
462 Kevin	Sidlinger		Halibut Cove	AK	Consumer
463 Nick	VandeParne	7905 Reed Rd.	Howard City	MI	Coal Point
464 Jackson	Miles	1570 Homer Spit Rd.	Homer	AK	Snug/FF
465 Latroi Lamont	Williams	31 Soundview	Homer	AK	Crane Pitcher
466 Joe	Maze	1060 Miller Ln.	Homer	AK	All Good
467 Charlie	Black	P. O. Box 666	Homer	AK	Commercial Fishing
468 Chris	Collier	1574 Homer Spit Rd.	Homer	AK	Homer Dock
469 Bryon	Anderson	P. O. Box RDO	Homer	AK	Captain
470 Travis	Staple	308 Dakota St.	Weed	CA	Captain
471 Rich	Myers	2340 Eugene Ave.	Chico	CA	Consumer
472 Lois	Bentler		Homer	AK	Salmon Consumer
473 Ben	Martin		Homer	AK	Charter Captain
474 Scott	Glosser	Box 3133	Homer	AK	Charter Captain
475 Mike	Swan	P. O. Box 2397	Homer	AK	Charter Captain
476 Phillip	Hillstrand	P. O. Box 1312	Anchor Point	AK	Time Bandit
477 Sugayle	Geissler	4047 Main St. #209B	Homer	AK	Salmon Consumer
478 Gary	Hammond	P. O. Box 356	Anchor Point	AK	Fisherman Morning Dew
479 Tyler	Houghton	P. O. Box 434	Lakeview	MI	Consumer
480 Heath	Woller	15020 Tamarind Rd.	Howard City	MI	Coal Point
481 Brian	Saunders	54765 East End Road	Homer	AK	Fly Shop Owner Guide
482 Brandy	Saunders	54765 East End Road	Homer	AK	Fly Shop Owner Guide
483 Josh	Nordstrom	53587 Marimac Ave.	Homer	AK	Fisherman "Angler"
484 Jessie	Edson	4234 Svedlund Ct. #2	Homer	AK	F/F Kupreanof Deckhand
485 Caressa	Bohrer	PO Box 3627	Homer	AK	Fisherwoman/concerned citizen
486 A. Reed	Matthews	64615 Shelton Dr.	Homer	AK	F/V Windigo Deckhand
487 Michael	Jahrig	491 Bridge Access Rd.	Kenai	AK	Commercial Salmon UCIDA
488 Clay	Nelson	37215 K-Beach Rd.	Kenai	AK	Gypsy Jolly Cook Inlet Drifter
489 Dan	Storrs	5140 Kachemak Dr.	Homer	AK	Harbormaster
490 Michael	McGuire	P. O. Box 343	Homer	AK	Consumer
491 Cris	Rideout	P. O. Box 2430	Homer	AK	Subsistence Fish/Bristol Bay Support commercial fisheries and subsistence for AK residents
492 Maynard	Linder	PO Box 2119	Homer	AK	"
493 Tobias	Tucker	37457 Rascal Ln.	Homer	AK	Fish is Good/Protect the Resource

5/31/11

## Stakeholders of the Salmon Resource in the Gulf of Alaska

494 Gregory	Drais	106 W. Bunnell Ave.	Homer	AK	F/V Lady L Cook Inlet Drifter
495 Matt	Tucker	P. O. Box 3696	Homer	AK	Teacher
496 Amanda	Miller	P. O. Box 3696	Homer	AK	Teacher
497 Jenny	Roth	P. O. Box 3171	Homer	AK	Commercial Fisherman
498 Tory	Rockefeller	53370 Greenwood Dr.	Homer	AK	Local Business Owner
499 Paul	Hueper	PO Box 301	Homer	AK	Business
500 Eric	Cafmeyer	4401 Upper Kogru Dr.	Homer	AK	Like Fishing
501 Linnea	Mario	4401 Upper Kogru Dr.	Homer	AK	Dip Netting
502 Barbara	Konecnik	Marlboro Road	Cape Cod	Maine	Personal Value
503 Allen	Saxton	P. O. Box 15203	Fritz Creek	AK	Consumer
504 Robert G.	Pletnikoff	P. O. Box 3401	Homer	AK	F/V Mist Harbor
505 Jessiie	Pletnikoff	P. O. Box 3401	Homer	AK	F/V Mist Harbor
506 Christine	Kulcheski	P. O. Box 3081	Homer	AK	Fish Lover
507 Robin	McAllister	152 W Bayview	Homer	AK	Fisherman Lover
508 Michael	Jones	P. O. Box 91865	Anchorage	AK	Former Commercial Fisherman/sportsfisherman/longtime Alaskan raised in Kodiak
509 Charles	Jones	531 A. Narwhale	Fairbanks	AK	Intrinsic Value, Naturalist, PhD
510 David	Schneider	P. O. Box 424	Homer	AK	Sport/Personal Use
511 Louise	Seguela	P. O. Box 47	Homer	AK	Personal Use
512 Galen	Lyon	P. O. Box 47	Homer	AK	Personal Use
513 Steve	Novakovich	P. O. Box 3087	Homer	AK	Cruiser II Charter
514 Hardin	Terrell	737 Fireweed	Homer	AK	Pinbone Personal
515 Patrick	Houlihan	35895 N. Fork Rd.	Anchor Point	AK	Sport Fisherman
516 Barry	Cundiff	41115 Sterling Hwy	Homer	AK	Commercial Fish
517 Christine	Szocinski	436 Bonanza Ave.	Homer	AK	Private Boat/Interest in King Salmon

Eric Olson, Chair  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Ave. ,  
Anchorage, Alaska 99501

**Re: Agenda Item C-4 Chinook Salmon Bycatch in GOA Pollock Fishery**

With regards to an allowable amount of King Salmon bycatch, I don't think any bycatch should be allowed. It's basically taking away someone else's legitimate opportunity for fish. Fundamentally, I don't see much difference between bycatch and poaching.

While absolute elimination of bycatch may be difficult to achieve, I think those that are guilty of bycatch should be required to keep the fish they catch and have these fish delivered, in an edible condition, to those who are faced with loss of local opportunity to catch their historic harvest of King Salmon. Only when the penalty of bycatch is this onerous will fishing fleets make an all out effort to reduce or virtually eliminate this waste of a very valuable resource.

Sincerely,

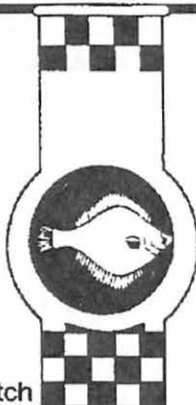
George Matz  
PO Box 15182  
Fritz Creek, AK 99603

## F/V HAZEL LORRAINE

202 Center Street  
Suite 315-274  
Kodiak, AK 99615

Tel: 907-486-7599

Eric Olson, Chairman  
NPFMC  
605 W. 4<sup>th</sup>, Suite 306  
Anchorage, AK 99501-2252  
Fax: 907-271-2817



May 30, 2011

Re: C-4 GOA Chinook salmon Bycatch

Dear Chairman Olson,

The Hazel Lorraine began fishing pollock in 1983; Kodiak openers are three or four of the primary ribs in the backbone of our annual fishing plan. Our crew (All Alaskan) depend on each portion of the fishing season as much as any other segment for their earnings. Many captains/crewmembers of trawlers have commercially fished salmon (sports and subsistence too) and in a community the size of Kodiak, you are surrounded by friends and family in the salmon business, seining, set netting, charter, and guides. This awareness of salmon makes our position that much more difficult when facing potential hard and fast rules that can put "you" in the hot seat; "if" "you" catch the last salmon of a hard cap and close the fishery for all the other people in the GOA dependent on this fishery. This is an extraordinary burden.

The majority of the trawl fleet has adopted the salmon excluder technology developed by Dr. Craig Rose, evolved over a decade, with the fall 2010 model showing great promise. This tool works, but deployed in an Olympic style fishery without individual accountability this leaves the GOA dependant communities looking over a precipice every time the gun is shot. The list is very long when the dollars of this fishery pass through the hands of so many in the communities of King Cove, Sand Point, and Kodiak.

Lacking the ability to use tools available in the Bering Sea pollock fishery, please consider a gulf wide cap of 30,000 fish; split 23,000 fish for the Central Gulf and 7,000 for the Western Gulf in 2013. Starting in 2013 would dovetail with the beginning of the new NMFS observer program enhancing data and hopefully at some point in the near future the race for pollock in the GOA will end with a Bering Sea tool chest. Stopping the race for pollock in the GOA, adding individual accountability, SeaState oversight, establishing individual bycatch numbers at the vessel level, would lower Chinook bycatch and increase the productivity of this fishery.

Respectfully,

A handwritten signature in black ink, appearing to read 'Albert Geiser', with a long horizontal flourish extending to the right.

Albert Geiser  
Owner, Hazel Lorraine

Franke L. Brown  
Great Alaska Fisheries  
P.O. Box 275  
Kodiak, Alaska 99615  
907-942-9359 cell

May 31, 2010

Eric Olson  
North Pacific Fisheries Management Council  
605 W. 4<sup>th</sup> Suite 306  
Anchorage, AK 99501

Dear Chairman Olson,

Since the early 1980's my partner and I have been heavily involved in the Pollock fishing industry in Kodiak and the Bering Sea. We own and operate the F/V Vanguard. Our homeport is Kodiak, Alaska and we and our crew are Alaska residents. We support the local economy financially and provide service in the community in different service oriented organizations.

The local Kodiak fleet and our operation have been actively engaged in developing a variety of excluders in an effort to prevent unnecessary by-catch. Our experience shows that our excluder has been modified and proven to reduce by-catch, including salmon.

As a result of our efforts to reduce by-catch I would like to suggest and support 100% retention of salmon in the Pollock fishery. In addition, I would like to see that video monitoring be implemented into the Observer program.

I would request that a Gulf wide interim cap of 30,000 fish (salmon) be split between the Central Gulf of 23,000, and the Western Gulf of 7,000 salmon. After the interim period, the cap could be reduced to a lower number. This interim period would provide for time to refine additional by-catch measures.

Last, the Pollock fishery is very important to the fisherman, the processors and the community of Kodiak. When you consider your decision regarding the salmon by-catch allocation, I would ask that you also take into consideration the history and the dependency on the Pollock fishery that our community has. The impact of your decision could have a damaging outcome if not all factors are considered.

Thank you for your time and consideration.

Franke L. Brown



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

**Re: C-4 GOA Chinook Salmon Bycatch**

**Dear Mr Chairman:**

**Thank you for the opportunity to comment before the council on Chinook Salmon Bycatch in the GOA Pollock fisheries.**

**My name is Paddy O'Donnell. I have been involved in the trawling industry for 21 years in Kodiak and own the 85 foot fishing vessel Caravelle. It is a family owned vessel in Kodiak where I live with my wife and 2 children. 80% of my crew are from Kodiak. Pollock is a big part of my fishing so we take this situation very seriously.**

**You once said at one of the past meetings the data is the data, so I ask you to look at the data as provided over the last 17 years and make your decision based on the data available not on hearsay and speculation.**

**All this comes forward based on the observer data of a couple of boats in area 610 which is 500 miles SW of Kodiak, and 500 miles away from where we fish pollock around here. If you are going to put restrictions in place put them in place in the geographical area that the problem exists, not 500 miles away on somebody else's doorstep.**

**As a result of the high Chinook By-catch in area 610, the Kodiak Trawl Fleet has taken it upon ourselves to monitor and control salmon by-catch in every fishery not alone pollock as best we can with the means we have available to us. It is not something new to us to have to do this, as we have been doing it for years. We are just doing it now with a greater intensity.**

**I support full retention for Salmon in the Pollock Trawl fisheries for several reasons. First, it is not practical nor is it safe to expect crew to sort out Salmon when you are dumping a 70 ton codend of pollock on a calm day never mind on a day when we have 20 to 30 foot seas with winds up to 50 Knots. Second, 100% retention of Salmon will improve accounting and increase genetic sampling so that the science will be available to all to determine stock of origin. And third, retained Salmon could be fully utilized to benefit programs such as SeaShare that provide much needed protein to food banks across the country.**

**I do not support the preliminary preferred alternative (PPA) hard cap of 15,816 fish to the GOA as this cap has been exceeded four times since 1994 and has the potential for**

shutting the fisheries down prematurely with a cost to the fleet the processors and the entire community of Kodiak.

The PPA Western GOA cap of 6,684 has however only been exceeded once since 1994 and that was in 2010 where all these problems began. If both areas are to be controlled under one then they need to be treated the same. This PPA gives an advantage to the WGOA over the Central GOA.

In order to get to the bottom of why there are high levels of by-catch in certain areas at certain times of the year, we need to look at the data and the science and figure out when and where are the best times and places to fish.

When the Shelikof was open to Pollock trawling and we did not have to worry whether we were in 630 or 620 and before all the haulouts were in place we had a lot lower Salmon by-catch than we have now. That to me is an option worth looking at as it would make it easier for the fleet to operate in different areas with the potential to keep by-catch of salmon lower.

I urge the Council to take every measure possible to deal with this situation with out impacting the fleets ability to harvest the pollock available. We have to look at the impact a hard cap would have if the pollock quota were to double from its current levels, as it would seriously hinder the fleet in being able to harvest that quota.

Regards,

  
Patrick O'Donnell

To: Eric Olson, Chairman

North Pacific Fishery Management Council

605 W. 4<sup>th</sup>. Suite 306

Anchorage, AK. 99501-2252

Fax: 907-271-2817

Re: C-4 GOA Chinook salmon by catch

Dear Mr. Chairman

My family owns and operates f/v Michelle Renee. Our vessel is fully dependent on the GOA fisheries (except for the times when we have to maintain our LLP status). We do not have the luxury of moving from one ocean to another. Therefore the issue of salmon( or halibut) bycatch becomes very important to us. As a GOA fisherman I am asking you to consider the following before making a decision on the amount of the cap. Recently we are seeing an increase of the Pollock and Salmon biomass. This suggests that these fisheries are healthy. There are cycles in every fishery. The GOA fisheries are different then the Bering Sea fisheries. One of the differences is, the Bering Sea fleet has had several years to work on this subject. The vessels are also bigger. The excluder they developed may have to be improved to fit the vessels in the GOA. The grounds and the way Pollock behave are different. And last of all the Pollock fishery in the Bering Sea is conducted under a catch share program. As someone who has been in the fishing business for 35 years I am committed to solving all of the issues to maintain the stability of all sectors and communities in the GOA. In my opinion of the three proposed caps only the 30000 fish cap addresses National Standard 1, Optimum yield, NS8 minimize adverse impacts to fishery dependent communities and NS9 minimize bycatch to the "extent practicable".

Thank you

Stoian Iankov

# Groundfish Data Bank

Alaska

PH: 907-486-3033 FAX: 907-486-3461 P.O. BOX 788 - KODIAK, AK. 99615

Julie Bonney, Executive Director jbonney@goi.net  
Katy McCauley, Fisheries Biologist agdb@goi.net



May 31, 2011

Eric Olson, Chairman  
NPFMC  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

Fax: 907-271-2817

Re: C-4 GOA Chinook salmon Bycatch

Dear Chairman Olson,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes shorebased processors and trawl catcher vessels that operate in the Gulf of Alaska (GOA). This action has the potential to severely impact pollock dependent communities, processors, processor workers, trawl vessel owners, trawl vessel crews, fishing service and support sectors, while it is not possible to determine the net benefit to Alaskan salmon and salmon users when trawl Chinook salmon bycatch is reduced. Economic impact to the pollock industry could be large, yet benefit to Alaskan salmon stocks and salmon users is undeterminable due to present lack of scientific data.

**The members of AGDB support the following as an outcome for this action:**

- (1) An ESA based hard cap limit of 30,000 fish as a bycatch control measure for the GOA pollock fishery where the CGOA management area would receive 23,000 Chinook salmon and the WGOA management area would receive 7,000 fish. The caps would act as a bycatch control mechanism as an interim measure until the Council provides tools for the GOA pollock fleet to further reduce Chinook salmon bycatch.
- (2) Full retention of all salmon in the pollock trawl fisheries.
- (3) Immediate expansion of biological data collections for both unobserved and observed vessel trips once full retention of all salmon is allowed. The data would provide the best available science to determine the impact of trawl Chinook salmon bycatch on Chinook salmon users (the number of adults that would potentially return to each region).
- (4) Improvements in PSC estimates -- expanded observer coverage for the less than 60 ft vessels, full census Chinook salmon accounting by processors and observers at shoreside plants and more timely availability of PSC Chinook salmon census data.

**We do not support the Preliminary Preferred Alternative (PPA) hard cap of 22,500 fish divided 15,816 fish to the CGOA and 6,684 fish to the WGOA. We do not support implementing the regulatory amendment mid-year in 2012.**

***Problems with the overall PPA of 22,500 Chinook***

The Council motion includes three potential hard cap levels of 15,000, 22,500 and 30,000 fish. The cap level of 30,000 fish is based on the incidental take statement that accompanied the biological opinion on the effects of the Alaska groundfish fisheries on ESA-listed salmon of the Pacific Northwest. The other two levels are determined arbitrarily by calculating either 50% of the 30,000 (15,000 fish) or 75% of the 30,000 (22,500 fish). The Council appears to have chosen the 22,500 fish cap level based on the PSC estimates during the time period 2003 – 2010. However, the quality of the data during this short time frame is not robust. Additionally, the variability of both pollock and Chinook salmon abundance in this time frame is not considered in the context of a broader time series .

Quality of the Data: The proportion of total catch that is observed in the GOA groundfish fisheries is much lower than in the Bering Sea (BS) fisheries since the majority of the GOA fleet is subject to 30% observer coverage. For example in 2010, in the WGOA there was 12% observer coverage and in the CGOA there was 32% observer coverage (Table 95). When examining observer coverage by season, coverage percentages are even more variable, with a low in the WGOA of 0% and a low in the CGOA of 12% for particular seasonal fisheries (Table 96). The GOA observer coverage is much less than what is in place for the BS AFA fleet (100% and 200% observer coverage levels) for the BS hard cap management regime. For the GOA, the present observer program requirements do not distribute observer coverage in time and space which means that PSC estimates are less robust and much too variable to efficiently accommodate a hard cap management regime. Thus the confidences in the PSC estimates both historically and under a future hard cap regime are much less certain, yet the economic consequences are large at the fleet level in the GOA if the pollock fishery is shut down when the hard cap is reached.

There are several examples of limited amounts of observer coverage being extrapolated to the unobserved fleet that created large PSC estimates in the GOA fisheries. From Balsiger, 2007: "Approximately half of the 40,153 Chinook salmon estimated for 2007 is based on two consecutive hauls from a single vessel in a single day. This vessel was required to have an observer for at least 30 percent of its fishing days. The first haul was observed and contained very few salmon and a very small amount of groundfish. The next haul on the same day by this vessel was unobserved and took over 100 metric tons of groundfish. The rate of salmon incidental take from the observed haul was applied to the unobserved haul, resulting in a large number of Chinook salmon attributed to the unobserved haul. The vessel reported taking less than 50 salmon in the unobserved haul. However, our Chinook salmon catch estimate is consistent with our established protocol for use of observer data in extrapolating salmon numbers in observed portions of catch to total catch estimates in our catch accounting system (and thus was not removed)."

Additionally, in the fall of 2010, NMFS discovered that a particular unintentional fleet behavior was causing inconsistent results in the use of a basket sample versus the offload census data. In this case the basket sample was used to determine the PSC estimate versus a full census count based on the offload tally. The basket sample estimated approximately 3,400 Chinook salmon for the individual vessel PSC catch yet the offload census for the same vessel estimated 50 Chinook salmon. The vessel's basket rate (salmon / MT groundfish) was applied to the unobserved fleet and resulted in a catch estimate of over 10,000 fish. Thankfully NMFS has implemented a programming improvement that allows for offload census data to be the source of the salmon estimates and the high count basket data of 3,400 fish was removed and replaced with census data of 50 fish.

While the two examples above demonstrate data problems with high estimates historically, it is expected that there are cases where low estimates occurred and were not representative of actual PSC salmon catch during the historical time period. In other words both the highs and lows within the historical time clip either by season or year may not be representative of historical actual salmon bycatch when choosing a hard cap level. When setting

a cap level the Council has tended to eliminate these high estimates not acknowledging it is just as likely that low estimates of Chinook salmon bycatch also occurred within the time series.

While the Council intends to improve the PSC estimate with this action, the data will still have issues when managing a hard cap. There will be rare circumstances where the off-load census is not completed, for example if a vessel observer was ill and could not monitor offload, and a plant observer was not available to assist with the offload sample. Another instance when a full census is not possible is when an observed vessel delivers its catch to a tender at sea. Additional observer coverage for the GOA will not fix issues with large estimated values based on basket samples for individual vessels that are then extrapolated to the unobserved vessels.

**Variability of Salmon abundance:** It is certain that the pollock fishery is intercepting Chinook salmon that originate from Alaska, Asia, and the Pacific Northwest, as Chinook from all these areas are present for extended periods of their life-cycle in the North Pacific and eastern Bering Sea. Abundance trends of Chinook are based on scientifically recognized climate regimes where certain conditions influence recruitment differently across regions. For some stocks in Alaska, stock condition is presently poor (Karluk River, some rivers in western Alaska, and Cook Inlet) while salmon in other regions are presently near or at historical highs. For example SE all-gear quota for 2011 is 294,800 Chinook, an increase of 73,000 fish over last year's pre-season quota of 221,800 fish. Columbia River Fall Chinook is forecasted at 760,000 fish, 112,000 more than last year and the fifth largest run since 1948, and the Columbia Summer Chinook run is expected to exceed the previous record return of 89,543 fish set in 2002 for the 2011 fishery.

Chinook salmon are more abundant in the GOA than in the BS. For example total Chinook salmon harvests (sport, commercial, and subsistence) for 2007 (the most recent year for available subsistence harvests) was 917,414 fish, split 272,742 fish for the BS and 644,672 fish for the GOA. Additionally, large amounts of hatchery fish are present in the GOA. Hatchery releases have ranged from 154 million to 275 million for the period 2002 – 2009 where the majority of the hatchery production (WA /OR /CA /BC/ SE/CI /Kodiak) is adjacent to the GOA, particularly for the CGOA region (analysis figures 13 – 19, pages 121 to 124). Chinook bycatch has been shown to be highly variable in both time and space, and thus unpredictable (Figs. 3 & 4 in the analysis).

**Variability of pollock abundance:** The historical time clip of 2003 to 2010 is a time period when pollock quotas have been relatively low. As figure 2 on page 19 of the analysis shows, the CGOA has the highest variance of available pollock quota, with a high of 89,460 MT in 1998 compared to a low of 15,249 MT in 2009. In the WGOA the pollock quota has ranged from a high of 47,127 MT in 1991 to a low of 15,249 MT in 2009. The 2010 GOA SAFE report indicates that the current trend of increasing TAC is expected to continue through 2012:

Year	W/CGOA Pollock TAC (MT)
2009	40,405
2010	73,761
2011	84,631
2012	109,380

Projections included in the GOA SAFE also indicate that the pollock biomass will support a larger TAC for the next 10 years than was available during the most recent 5-year average.

Choosing a hard cap that is restraining for the pollock fleet based on less than robust PSC estimates, and a cap that does not account for variability of both Chinook salmon abundance and pollock abundance, will be problematic for the pollock fleets. Adopting a hard cap based on the ESA trigger of 30,000 fish would account for these uncertainties while preventing a 2010 event from happening again.

**Equity of the PPA hard cap between regions:** The difficulty of developing a cap management structure by management area is exacerbated because the CGOA and WGOA regulatory areas differ in fleet participants, dependent fishing communities, and Chinook salmon abundance. Application of regulatory caps should be applied equitably across both regions to create the appropriate incentives for both fleets to manage Chinook salmon bycatch as best as they can to prevent the high levels of bycatch as occurred in October of 2010.

The analysis only considered the years 2003 to 2010 when the PPA was chosen - a period of lower pollock abundance. The June analysis expands the historical data set to include the period 1994 to 2002, which includes years of higher pollock quotas. AGDB has depicted the data in graphical form as shown in Figure 1 and 2 (see analysis page 23 – table 4). The longer historical data set provides a more realistic picture of pollock abundance and Chinook salmon bycatch over time. As the information shows for the CGOA, the adopted PPA was exceeded four times in the time series - three times when the questionable 2007 year is excluded. In the WGOA, the adopted PPA was exceeded only once in the time series -- in 2010. Practically speaking, since the WGOA 2010 bycatch occurred during the "D season", the high level of bycatch would not have been realized until after the Pollock was harvested, at which time a closure would have been meaningless.

Another way to consider the inequity is by dividing the PPA cap selected for each regulatory area by that area's historical high. In that calculation, the CGOA would receive approximately 74% of the fleet's historical high for the period 2003 – 2010, excluding 2007 (15,816 fish divided by 21,429 fish) and approximately 67% for the period 1994 – 2002 (15,816 fish divided by 23,758 fish). In the WGOA they would receive approximately 112% of their historical high for the period 2003 – 2010, excluding 2010 (6,684 fish divided by 5,951 fish) and approximately 194% for the period 1994 – 2002 (6,684 fish divided by 3,448 fish).

Figure 1. CGOA Chinook salmon PSC catch and Pollock harvest in comparison to the PPA of 15,816 fish. Pollock TACs are included for 2011 and 2012 based on 2011-12 Harvest Specifications.

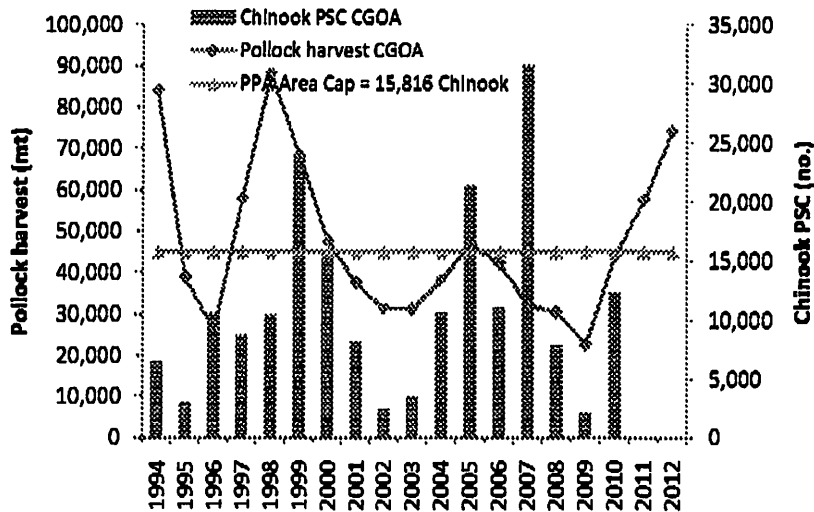
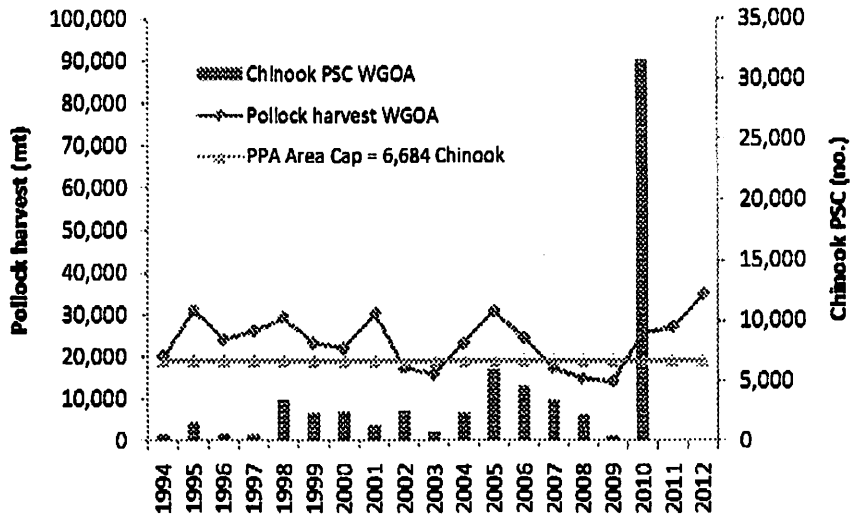
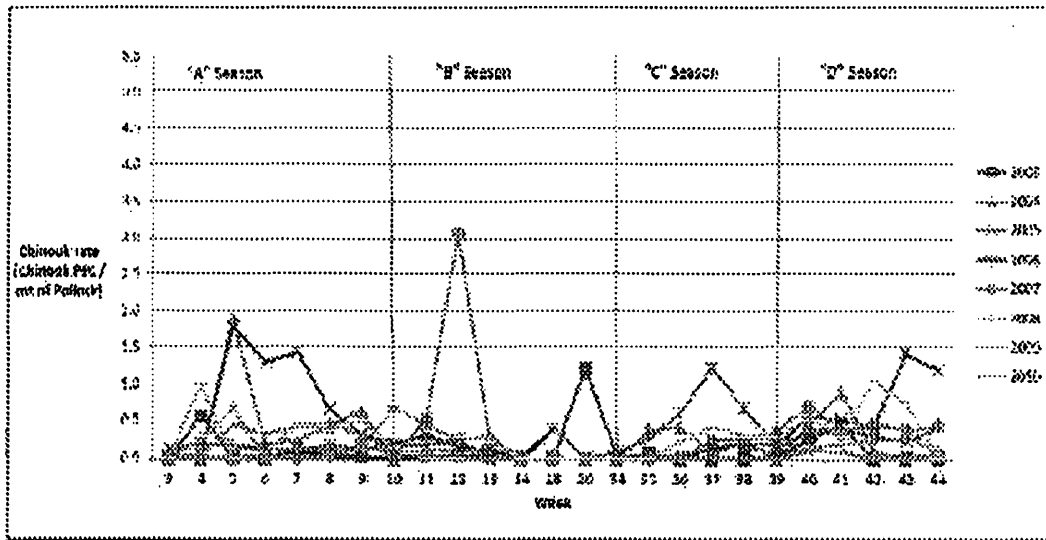


Figure 2. WGOA Chinook salmon PSC catch and Pollock harvest in comparison to the PPA of 6,684 fish. Pollock TACs are included for 2011 and 2012 based on 2011-12 Harvest Specifications.



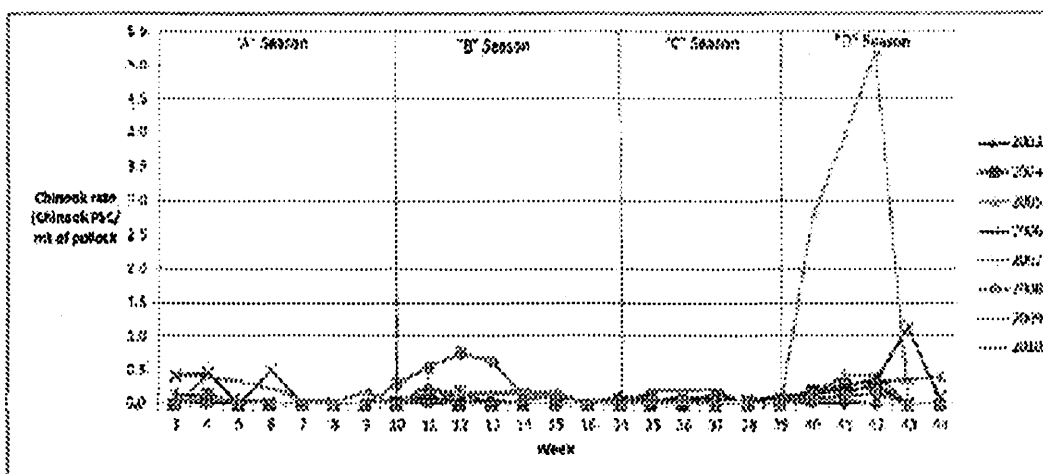
Additionally, figure 3 (page 56) and figure 4 (page 57) show that bycatch rates are variable over all seasons in the CGOA while in the WGOA bycatch is typically lower in all seasons except the D season. Because the CGOA bycatch rates are so variable it sets up incentives where the CGOA fleet will need to be ever vigilant to stay under the hard cap, while historically the WGOA fleet has needed to pay close attention only during the D season.

Figure 3 Chinook salmon prohibited species catch rates in the Central Gulf of Alaska pollock trawl fishery by week, 2003-2010.





**Figure 4 Chinook salmon prohibited species catch rate in the Western Gulf of Alaska pollock trawl fishery by week, 2003-2010**



**Equity of the PPA hard cap between regions:** The Council appears to be treating each regulatory area differently with the selection of the overall cap and the allocation of this cap between the two management areas. In the CGOA the Council is requiring Chinook salmon bycatch reduction, while in the WGOA the Council is acting merely to prevent what occurred in 2010, and actually allowing Chinook bycatch to increase beyond other historical highs during the historical period.

It appears that the Council is more concerned about Chinook salmon bycatch in CGOA yet there is no stock of origin information to suggest that Chinook salmon bycatch in one management area has a greater or lesser impact on particular Chinook salmon runs of concern. The Council is providing no new tools to avoid salmon bycatch; what is in the tool box is identical between the two management areas.

**Problems with the wrong split:** The GOA pollock fisheries are fast-paced fisheries that are difficult for NMFS to manage with present effort patterns. If either the CGOA or WGOA receives a cap that is too low, resulting in that area shutting down prematurely, there are very few opportunities for vessels and processors to make up the lost revenue. One obvious option should one area shut down is for vessels that have LLPs that are endorsed for both the CGOA and WGOA to redeploy to the open area. As the analysis points out, between 45 percent and 60 percent of the vessels participating in the Central Gulf pollock fishery each year were also eligible to participate in the Western Gulf; approximately 90 percent or more of the vessels that participated in the Western Gulf pollock fisheries between 2003 and 2010 were also eligible to fish in the Central Gulf fishery (page 103-104). It is unknown how NMFS will be able to manage the remaining open GOA pollock management area if a large percentage of disenfranchised qualified vessels deploy to the open area, once their traditional area pollock fishery is shut down due to the Chinook salmon bycatch cap.

While some would suggest that processing capacity will control excessive effort, this is not necessarily the case since vessels can still transit back to their historical processors. Vessels have delivered pollock from Area 620 (CGOA) back to Sand Point/King Cove and from Area 610 (WGOA) back to Kodiak. Tendering is allowed west of 157 degrees West longitude, which increases the economic range of the smaller vessels out of Sand Point / King Cove. The tendering rules allow a vessel to fish wherever they choose but the vessel cannot offload to a tender unless they are on the other side of the 157 line. This means that Sand Point/King Cove vessels can fish further

away (i.e., in the CGOA) but still deliver to a tender inside the 157 line. For the Kodiak vessels, since the majority of the vessels pack 300,000 pounds, it is still economical to make the long trip for a load of pollock. In the BS AFA pollock fishery, catcher vessels have been known to fish above the Pribilof Islands and transit their fish all the way back to Dutch Harbor. An equitable split is paramount to preventing complete havoc in the GOA pollock fisheries.

**Mid-year implementation:** The problem with the hard cap division between management areas is illuminated when examining the impacts of mid-year implementation for CGOA and WGOA management areas. The mid-year PPA was determined by multiplying the annual PPA Chinook salmon PSC allowance in an area by the average percentage of Chinook salmon PSC taken within each area during the "C" and "D" season, and increasing that number by 25%. The net result is a hard cap allowance of 7,710 Chinook salmon for the CGOA and 5,598 Chinook salmon for the WGOA. Based on the 2011 pollock TACs, the salmon PSC cap allowance would be reached before the TAC is harvested, if the Chinook salmon to pollock catch rate is above 0.31 in the CGOA. From 2003 through 2010, the rate was above 0.31 during five of the eight years (page 95). For the WGOA, however, a Chinook salmon per metric ton of pollock catch rate of 0.32 or less would be needed to harvest the entire TAC (page 96). That rate was only exceeded during 2010.

***Bycatch control versus bycatch reduction***

The Council has fast tracked (initiated an analysis in December of 2010 with final action slated for June of 2011) Chinook salmon bycatch measures for the GOA due to the large Chinook salmon catch that occurred in October of 2010 when the ESA trigger of 40,000 fish was exceeded. When the Council initiated the analysis they suggested that this package was an interim measure to control salmon bycatch with a more comprehensive package coming later. However, it now appears instead of controlling bycatch and improving data quality, the main goal is bycatch reduction for the fleet. This is an ideological approach by the Council. The action cannot be about a reduction masquerading as a control while ignoring the additional tools required to reduce bycatch.

When the BS AFA pollock fleet had problems with Chinook salmon bycatch the Council spent over two years developing a comprehensive package that included tools for bycatch reduction, the best scientific information for impacts on Chinook salmon stocks of origin, and rigorous quality data collection measures. The BS fishery was in a similar position with regards to Chinook salmon bycatch—a recent all-time annual high of Chinook salmon bycatch. It is difficult for GOA pollock dependent participants to understand why the rush—unless this regulatory action is an interim package to prevent exceeding the ESA trigger. If that is the goal, a cap of 30,000 fish is justified, bycatch control instead of bycatch reduction.

***GOA pollock fishery is not the BS AFA pollock fishery***

The broader public does not understand that the GOA pollock industry is not the same as the BS pollock industry and in some cases Council members believe that GOA industry can perform at the same level as the BS fleet. Table 1 shows differences between the two fisheries. In the BS the fleet operates in cooperatives where each vessel has its own pollock allocation and own Chinook salmon PSC allocation. Co-op contracts and codes of conduct are two tools allowed by AFA that provide the possibility for the industry members to police themselves and deal with issues like bycatch.

The GOA pollock fishery is an Olympic style derby fishery with no vessel allocation for pollock or Chinook salmon PSC. Voluntary fleet agreements for best fishing practices can be put in place, but there is no way to require individual vessels to participate, and the race for pollock catch is in direct contradiction with bycatch reduction. Stellar Sea Lion measures are much more restrictive in the GOA than the BS, further limiting the fleet's ability to harvest pollock over space and time.

Table 1. Comparison of BS and GOA pollock management structure and fishery

	Bering Sea	Gulf of Alaska
<b>Fishery Structure</b>	AFA Co-ops	Olympic style derby
<b>Allocation</b>	Pollock TAC allocated to individual vessel level	TAC with no vessel allocations
	Chinook salmon PSC allocated to individual vessel level	<i>No Chinook salmon cap or vessel allocations</i>
<b>Governance</b>	Co-op and inter-coop agreements with codes of conduct and accountability measures	NMFS Juneau
<b>Harvester Participants</b>	Catcher Processors 200'-340' Catcher Vessels 90'-200'	CGOA: primarily CV's 65-120' WGOA: predominantly CV's <60'
<b>Regulatory Fishing Season</b>	A season: Jan 20 – June 10	A season: Jan 20 – March 10 B season: March 10 – May 31
	B season: June 10 – Nov 1	C season: Aug 25 – Oct 1 D season: Oct 1 – Nov 1
<b>Fishery Length</b>	3 months A season 4 months B season	Short pulse fisheries from .5 – 14 days
<b>TAC rollovers season to season</b>	No restrictions	Due to SSL protection measures, only 20% of the next season's pollock TAC can be rolled over if current season's TAC not fully harvested
<b>Steller Sea Lion Protection Measures</b>	Minimal SSL closures due to large shelf area	Many SSL closure areas 22-45% of fishable grounds (0-500 meters) of Regulatory Areas closed due to SSL measures
<b>Processors</b>	Motherships Catcher Processors Shoreside Processors	Shoreside Processors only
<b>Communities</b>	Dutch Harbor, King Cove, and Akutan	Kodiak, Sand Point, and King Cove
<b>Salmon Retention Requirements</b>	Full retention required by regulation	<i>Required to discard salmon at sea</i>
<b>Observer Coverage</b>	CV: 100% CP: 200% Motherships: 200% Shoreside plants: 200%	<i>CV&lt;60': 0%</i> <i>CV 60'-125': 30%</i> <i>Shoreside plants: predominantly 100%</i>

\*Bold and Italics denotes what is expected to change in the GOA with this action.

**Table 1. Comparison of BS and GOA pollock management structure and fishery (Continued)**

	<b>Bering Sea</b>	<b>Gulf of Alaska</b>
<b>Fleet Tools</b>	Rolling Hotspots/authority to close an area, restricted fishing developed over ten year period	
	Real time tow by tow bycatch accounting for CP and Mothership component	Bycatch reporting after the fact
	Salmon Excluders fully tested - 8 years to develop	
	Salmon Stock of Origin data	<b><i>No Salmon stock of origin data</i></b>
	Individual allocations and accountability; enforceable co-op agreements	Voluntary fleet agreements

\*Bold and italics denotes what is expected to change in the GOA with this action.

***No Tools for the Fleet for bycatch reduction***

The analysis suggests that the fleet may be able to change behavior to control and even reduce bycatch under the present management system. However, the suggested tools are tools that have been effective in cooperative fisheries. In the Olympic style GOA pollock fishery they may not work. In some cases they would at least need time to be developed, and in all cases they are extremely fragile because not all members of the fleet may participate, creating a scenario of the "tragedy of the commons" as participants in the fleet race for their historical portions of the overall pollock quota.

The analysis suggests several tools, but points out that in all cases these tools may be impractical, and in some cases cannot be brought to bear since presently the information is unknown. Examples are as follows:

**Proposed tool -Hotspot avoidance:** Participants may redirect effort to times and areas with lower Chinook salmon catch rates. Over time, effort should become more concentrated in areas that experience lower Chinook salmon PSC rates and decrease in areas of higher Chinook salmon catch rates.

**Problems:**

**Seasonal hotspot:** As was experienced in the BS, salmon abundance in areas is continually changing throughout the fishery, thus salmon avoidance is best in real time versus basing closures on historical high salmon events. While in the GOA there may be an area or areas during a certain time of year that should be avoided there is no data to identify this area or areas. Additionally, SSL regulations restrict the fleets both in area and time. The four quarter fishery schedule with the restricted amount of rollover limits harvest in time and the multiple rookery and haulout closures limit harvest in space.

**Real time hotspots:** According to the analysis, "Obtaining accurate estimates of Chinook salmon catch rates will likely be difficult for these fleets, which includes relatively small catcher vessel with little deck space and rapid pace with limited time to sort catch adequately to determine the number of salmon in a tow. If a vessel's salmon catch is not determined until after a delivery is made, it may not be possible for timely Chinook salmon catch rates to be shared, leaving vessels without current information concerning the distribution of Chinook salmon catch rates on the grounds."

**Time of day / depth of fishing hotspot:** According to the analysis, as participants gain insights into effects of other factors that affect Chinook salmon prohibited species catch rates through the experimentation, reporting and analysis of performance over time they may be able to change behavior. However, collecting the data to support

any trend would take time and experimenting with time of day and fishing depth within a race for fish would economically disadvantage the harvester and be extremely difficult to achieve.

**Proposed tool -- test fishing:** It is possible that agreements could be developed under which vessels may initiate fishing in a new area with relatively small tows and sample catches to supplement information gained in census of catches at offload.

**Problem:** According to the analysis, "Use of these estimates to direct or redirect effort would be delayed from the time of the tow until the time that the information is reported and processed. Given the rate of harvest of the TAC in the current fisheries, it is possible that these estimates may not be timely for directing effort in the fishery." Whether bycatch rates will remain stable throughout the fishery is unknown.

In an Olympic-style fishery, the only way the test tow and sample policy would work is if 100% of all vessels wait while this process takes place. Without the legal or binding contractual agreement that forces all vessels to stand down during this process it will not occur. Only within a catch share fishery where an individual vessel's access to the target fishery is not compromised by waiting for this test fishing, could it be reasonably expected to happen.

**Proposed tool -- delay fishing:** In some instances, participants have agreed to delay fishing in the pollock fishery to allow roe to mature, fish to aggregate for spawning, or a segment of the fleet to fish in other fisheries (such as Pacific cod or *C. bairdi* fisheries).

**Problem:** To coordinate a stand down it requires all vessel participants to agree; one vessel can impact the entire fleet's ability to stand down. Once a fishery begins, either by regulation or whenever the fleet decides to begin fishing, there is no assurance that bycatch will be acceptable and no mechanism that has any control over the individual vessel's behavior involved in the fishery. A race for fish is just that - once the fishery begins each vessel competes directly with other vessels to catch a larger portion of the available quota.

**Proposed tool -- voluntary catch share program:** The fleets have agreed to limit the number of trips any vessel would take or the amount of catch of any vessel to assure NMFS that the fleet would not exceed the total allowable catch, if the fishery were opened.

**Problem:** Both the CGOA and WGOA Pollock fleets have agreed to limit the number of trips a vessel can make or limit the amount of catch of vessels. This only happens when it becomes evident that the catching capacity of the active trawl fleet surpasses the TAC for a specific opener and NMFS will not open the fishery for fear of the TAC being exceeded. The fleet simply reconciles itself to the fact that being able to harvest some fish is better than not harvesting any. Limiting the number of trips that a vessel can make or the amount of fish that a vessel can harvest during a regular Pollock fishery is simply not operationally feasible under existing fisheries regulations and provides no assurance that Chinook salmon bycatch will be lower.

**Proposed tool -- salmon excluders:** Participants may also experiment with gear innovations, such as salmon excluders, to improve Chinook salmon avoidance.

**Problem:** The Salmon excluder developed for the BS was built and tested on larger higher horsepower vessels than are in use in the GOA. Scientific testing needs to occur to both validate the Chinook salmon bycatch reduction and give assurance that pollock catch due to excluder use is not diminished. According to the analysis, "Gear modifications may have associated equipment costs, but could also reduce pollock catch rates." Use of an excluder in an experimental mode while trying to compete with those who are not doing the same thing could cause economic harm to those that use the excluder effectively punishing those working the most diligently to

avoid Chinook salmon and rewarding those who are not. *A positive step the Council or Agency could take is to promote the development of a salmon excluder EFP specific to the GOA fleet of smaller vessels to accelerate development of excluders and their use.*

**Proposed Tool -- Fleets that coordinate or have experience with Co-ops can reduce bycatch**

Vessels are likely to draw on their experiences from other cooperative fisheries and lead in the development of agreements to control Chinook salmon prohibited species catches in the Central Gulf pollock fisheries.

**Problems:** Many active Pollock vessels do participate in the AFA Pollock fishery in the Bering Sea and the Rockfish program in the CGOA. These vessels fully see and understand that the tools available to them in these catch-share fisheries are not available to them in the Pollock fisheries in the GOA. Halibut savings were accomplished within the Rockfish program because the race for fish ended and incentives were incorporated in the co-op contracts for bycatch reduction. Vessels have their own allocation of Rockfish and secondary species so their economic revenues from the Rockfish fishery are secure. The reason that Chinook salmon PSC savings were accomplished within the AFA program is because each vessel has their own pollock and Chinook salmon PSC allocations along with the appropriate management incentives. Without individual allocations of the target fishery, measures that reduce Chinook bycatch, but also decrease the effectiveness of fishing practices, and reduce a vessel's access to the Pollock harvest, are highly unlikely to be implemented.

The largest challenge for any Chinook salmon avoidance program is that the fishery is managed under a race for fish. As the analysis points out, "without the security of an allocation of target species or an allowance of prohibited species catch, participants will need other assurances that measures that decrease the effectiveness of their fishing effort will not decrease their access to a share of the total catch from the fishery." Because the fishery is competitive in nature, a tragedy of the commons scenario results where the lowest common denominator for bad behavior (one vessel) can detonate any type of fleet agreement or coordination. The analysis notes that new entrants can join the fleet at any time since the number of LLPS is double to triple compared to actual participants by management area. Also, some vessels only participate early in the year (A and B seasons) so may not care whether they have access to pollock quotas later in the year. Additionally, there is no ability to determine when the fishery should start or end based on Chinook salmon bycatch rates. Seasonal structure opens the fishery by regulation and NMFS closes the fishery either when they anticipate the quota will be reached or when the available pollock quota is caught. Fishery participants do not have the authority to turn on and off the fishery to manage their Chinook salmon bycatch.

**CGOA voluntary efforts for salmon avoidance**

The CGOA pollock fleet voluntarily enacted Chinook salmon educational efforts for the 2011 A/B CGOA pollock fishery. The goal of the efforts was to be able to access Chinook salmon bycatch in real time during the pollock fishery. After experiencing three different fisheries (combined A/B 630 fishery, A and B Area 620 fishery) my personal angst and frustration as the ad hoc fleet manager with regards to the ability to reduce Chinook salmon much less control Chinook salmon bycatch with the limited tools available under the present management is at an all time high. To illustrate this point I want to describe our efforts and what we learned.

**Access to observer data:** 31 vessels signed observer data release forms granting AGDB access to their observer data. AGDB monitored the data and found that the census data in general was not available until the fishery was over. For example in the Area 620 A season the data was mostly complete 17 days after the fishery was over. The conclusion is that observer data cannot be used to manage short pulse fisheries in season. NMFS has acknowledged this issue when they state, due to the timing (of observer data) and the short length of the pollock fisheries ..., NMFS will be unable to estimate the total number of Chinook salmon prohibited species catch that will accrue toward a hard cap until after the pollock season has closed.

**Vessel reporting forms:** Vessels were requested to report fishing locations and salmon counts by delivery. It was apparent from the reports that a vessel had no idea how much salmon they were catching.

**Processors FT salmon counts:** All Kodiak processors provided FT salmon counts for each pollock delivery to AGDB for the duration of the fishery. FT counts were the most useful for inseason counts to understand what was going on in almost real time within the fishery.

**Salmon excluder:** Several vessels purchased and experimented with excluders during the fishery. Joe Collings, with the North Pacific Fisheries Research Foundation (NPFRR) was available to record underwater video to monitor flapper weighting and performance when fishing. The video, however, does not provide any information about the excluder's success for Chinook salmon release or whether pollock catch loss is occurring. These issues can only be assessed by a scientifically designed EFP.

**2011 620 A Example – what we learned:** To demonstrate concerns about available tools within the fishery I wanted to outline what occurred in the Area 620 pollock A season fishery. The fleet stood down until February 20<sup>th</sup> for both higher CPUE and roe quality. Their feeling was that if pollock CPUE was higher then Chinook salmon bycatch would be lower. The fishery was open for a five-day period starting on February 20<sup>th</sup> and closing on February 25<sup>th</sup> when the TAC was reached. Green, Yellow and Red Chinook salmon PSC rate standards were set for the fishery based on what the fleet hoped they could achieve and to prevent hitting Chinook salmon hard cap levels of greater than 22,500 fish. Operators were asked to notice AGDB if they were catching too many salmon so that the rest of the fleet could be informed. The average number of trips per vessel for the five-day fishery was three trips; some had more and some had less based on their ability to compete within the fishery.

Figure 5. Average number of Chinook delivered by trip and delivery date.

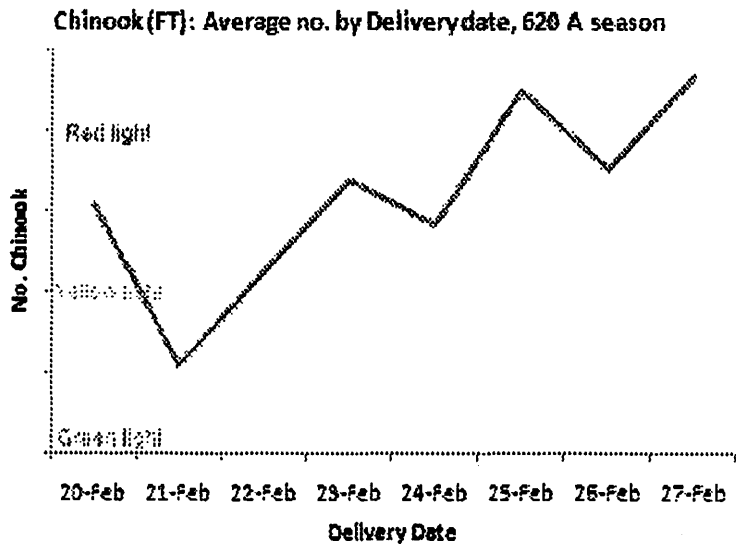
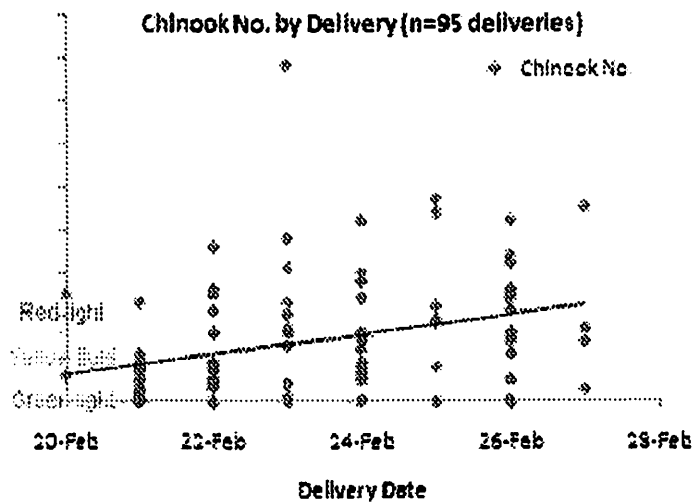


Figure 6. Number of Chinook salmon for each delivery by date



Figures 5 and 6 show the Chinook salmon delivery levels over the course of the five day fishery (based on fish ticket information). As a fleet overall an average trip -by -trip Chinook salmon per delivery were at the green level (first trip), at the yellow level (second trip) and finally approaching the red level (third trip). However, some individual vessel rates were acceptable for the third trip at the end of the fishery. For every trip that was at the red level, AGDB contacted each vessel operator; not one operator knew they were catching an unacceptable amount of salmon. As the AIS shot shows (figure 7) all vessels were fishing in the same location. Because of the fast-paced fishery, actual catch rates by trip were unknown until the fishery was over. Even if undesirable bycatch rates could be determined inseason there still remains the problem of stopping the fishery or redeploying the fleet to different locations within the fishery.

NMFS only has authority to close the fishery when the pollock quota is reached or the annual Chinook salmon cap is reached. If pollock quota remains and the fleet continues to fish yet salmon bycatch is unacceptable it is possible that later seasonal fisheries could be closed due to the Chinook salmon cap. While the fleet could redeploy to a different locations there is no assurance that bycatch would be lower in these locations. Additionally, the fleet could negotiate a stand down but this is a very tall order in short pulse fisheries to get all vessels to stop especially since they will all be deployed differently within the fishery (on the grounds, in town, or transiting to or from the fishery grounds).

**Salmon excluder testing and Vessel accountability:** Four Kodiak vessels volunteered to conduct experimental testing of the salmon excluder while the NPFRR technician was in Kodiak during the 620A season. One of these vessels was operated by a skipper who had purchased an excluder and was very willing and interested in having his excluder performance evaluated by the NPFRR technician. He was the only operator to make two trips with the technician: one pre-fishery test trip and on his first trip in the 620 A season pollock fishery. On his very next trip still using the excluder he caught the highest number of salmon for any trip within the fishery – the skipper had no idea he had caught so many Chinook. He is a responsible fisherman, proactive in using his new excluder, fishing in the same general area as most of the other vessels yet he caught the record number of Chinook during that fishery. These “lightning strikes” salmon hits occur by chance and excluders are no panacea – even to those with the best intentions to control/reduce their bycatch. When salmon abundance is high the salmon excluder will not effectively exclude enough salmon to achieve acceptable Chinook salmon bycatch rates within the fishery.



Figure 7: 620 A season (Feb 19-25) group fishing

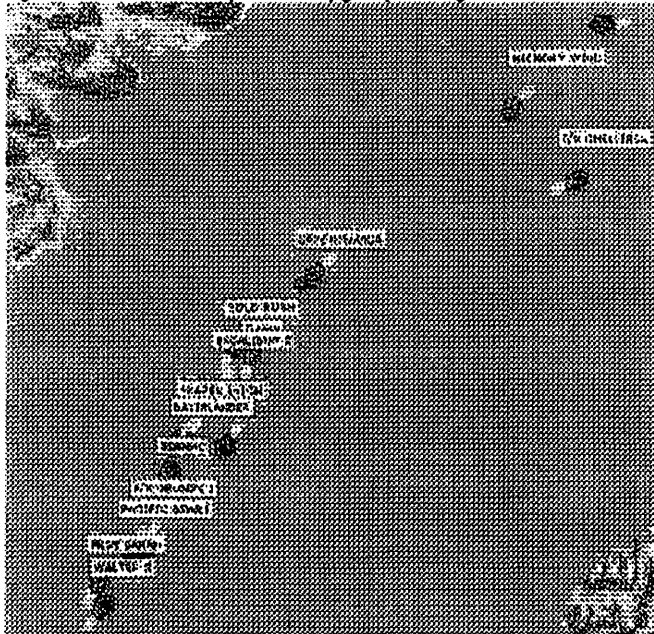


Photo Courtesy: Tholepin.blogspot.com

#### ***Scientific Data versus Opinion***

The PPA appears to be chosen to reassure Alaska Salmon users who are concerned about poor returns of the Chinook salmon runs in the State of Alaska. However, there is no scientific data to support claims that trawl bycatch of Chinook salmon are impacting these runs of concern. The scientific information available in the analysis (most recently analyzed in the Alaska groundfish Fisheries Harvest Specifications Supplemental EIS (NMFS 2007a)) states specifically, "With respect to direct mortality, the 2007 analysis indicates that there is insufficient information available to directly link prohibited species catch in the groundfish fisheries to salmon stock biomass levels." The 2007 EIS also states that "There is no evidence to indicate that the groundfish fisheries' take of Chinook salmon is causing escapement failures in Alaska Rivers."

The only cap level that is based on science is the ESA trigger of 30,000 fish. According to the State of Alaska recent comments on National Ocean Councils, the state supports data and information collection, and opposes mandating "precautionary approaches" or "precautionary principles" that dictate worst-case assumptions when faced with even a sliver of scientific uncertainty. To support the state position this action should therefore be an interim approach to control Chinook salmon to prevent future incidents as occurred in 2010 and impose a cap level of 30,000 fish.

In the meantime, industry, the State of Alaska and NMFS should move forward as quickly as possible to collect scientific data to understand the impacts of trawl bycatch to Chinook salmon stocks. It is crucial to collect genetic samples to understand the Stock of Origin of trawl bycatch Chinook salmon to assess impact to Chinook salmon runs. As NMFS letter of May 10, 2011 states, "To enable stock composition in the future, NMFS would need 1) to ensure that all salmon are retained and delivered to shoreside processing plants for sorting, 2) implement protocols at the shoreside plants to ensure that salmon were sorted and retained until sampled by an observer, and 3) ensure that observers are available to conduct the sampling at the shoreside plants for all pollock

deliveries." AGDB members support full retention of salmon and improved salmon accounting at shoreside plants to accomplish these criteria.

**Problem Statement**

AGDB members believe that the Council should reassess the problem statement that has been crafted for this action. The problem statement should be refocused to include the acknowledgement that no new tools are being provided to the fleet for bycatch reduction, and that the action's focus is improved PSC estimates and collection of stock of origin information to understand trawl bycatch impacts to the different river systems.

**Conclusion**

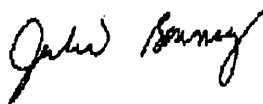
In conclusion, members of AGDB understand their obligation to minimize bycatch to the extent practicable (NS 9) and will continue voluntary fleet efforts to understand Chinook salmon bycatch and control it the best they can. However:

- The Council has not given the GOA pollock catcher vessels the necessary tools;
- Historical data is insufficient to understand when, how and why higher bycatch occurs;
- Salmon bycatch accounting is not real time;
- Both salmon abundance and pollock abundance are extremely variable;
- SSL regulations remove flexibility to control bycatch.

The practicability of reducing bycatch does not exist for the catcher vessels at this time. Additionally the analysis is clear that depending on the specific PSC limit selected, the PSC limit may prevent the pollock fishery from achieving total allowable catch in some years (NS1), but there is no data available to determine any net benefit to salmon users. The Council needs to take reasoned approaches that balance national standard objectives. Fishery management decisions need to be based on reality and not ideology.

Thanks for the opportunity to comment.

Sincerely,



Julie Bonney  
Executive Director  
Alaska Groundfish Data Bank, Inc

**References:**

Balsiger, J.W. 2007. "2007 Annual Report for the Alaska Groundfish Fisheries Salmon Incidental Catch and Endangered Species Act Consultation." Memorandum for Robert Lohn, Administrator, Northwest Region. NMFS Alaska Region, P.O. Box 21688, Juneau, Alaska.

May 31, 2011

To: Eric Olson, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup>, Suite 306  
Anchorage, AK 99501-2252  
Fax: 907-271-2817

Re: C-4 GOA Chinook salmon Bycatch

Dear Mr. Chairman:

Thank you for the opportunity to comment before the Council on Chinook salmon Bycatch in the GOA Pollock fisheries.

My name is Jason Chandler, I am the captain of the F/V Topaz, a family owned and operated trawler. We fish primarily in the Central Gulf, and hold a small amount of Pollock quota in the Bering Sea. Due to my participation in the Bering Sea Pollock fishery I am unable to attend the June council meeting.

Chinook Salmon bycatch is an issue I take very seriously. My vessel has recently purchased and begun using a salmon excluder for use in the Pollock fishery. The GOA fleet needs more time and tools to effectively reduce our Salmon bycatch. I find it very troubling that the Bering Sea fleet has been working on this for 10 years and are only operating under a hard cap this year. These are two very different fisheries. Bering Sea boats have their own Pollock quota, giving them time to assess the bycatch levels in different areas, and move around as necessary. In the GOA we operate in a race for fish. I see extreme difficulty in managing bycatch in a fishery that may only last for 12 hours. Placing a hard cap that is extremely limiting on an olympic fishery could be disastrous.

I am in support of full retention of Salmon in the GOA. This is an important measure that will aid in catch accounting and genetic sampling. I am asking that you be fair, recognize my history and dependence on the pollock fishery and protect my community which thrives on the trawl-caught fish. Please give the fleet the tools and the time to learn to control our bycatch so we can fully prosecute the pollock fisheries. I am requesting a gulf-wide cap of 30,000 fish split 23,000 fish for the Central Gulf and 7,000 for the Western Gulf with implementation in 2013 to coincide with the start up of the newly restructured Observer Program. I believe that this action should be an interim measure only until such time that we - like the Bering Sea fleet - have real tools to control and reduce our Chinook bycatch.

Thank you.

Jason Chandler  
F/V Topaz

# STATE OF ALASKA

## DEPARTMENT OF FISH AND GAME ALASKA BOARD OF FISHERIES

SEAN PARNELL, GOVERNOR

ADF&G, Boards Support Section  
P.O. BOX 115526  
JUNEAU, AK 99811-5526  
PHONE: (907) 465-4110  
FAX: (907) 465-6094

May 31, 2011

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

Dear Chairman Olson and members of the Council:

We are writing to recommend that the Council take action to minimize the incidental bycatch of Chinook salmon in the Gulf of Alaska groundfish fisheries. We appreciate the Council's responsiveness to the particularly high level of Chinook salmon bycatch in the 2010 Gulf of Alaska pollock fishery, and support immediate action to limit future bycatch.

At recent Board meetings addressing Kodiak Area and Cook Inlet Area salmon fisheries, the Board has had to take extreme measures up to and including closing fishing opportunity on specific salmon stocks. These actions have been necessary for the protection of stocks consistent with Alaska's constitutionally mandated sustained yield principle, the Board's statutory authority, and the Board's policy for the management of sustainable salmon fisheries (5 AAC 39.222).

The Board and the Department of Fish and Game recognize the current status for the following Chinook stocks under Sustainable Salmon Fisheries Policy:

Chuitna River Chinook	Management Concern
Theodore River Chinook	Management Concern
Lewis River Chinook	Management Concern
Alexander Creek Chinook	Management Concern
Willow and Goose Cr. Chinook	Yield Concern
Karluk River Chinook	Management Concern

NPFMC letter re Chinook bycatch

page 2

In some cases, recent escapement counts have been as low as a few hundred salmon. While there may be many ocean environment factors affecting salmon returns, the incidental harvest of salmon in federally managed fisheries may also have a significant effect.

The Board is left with having to take what actions it can, and in many of these cases there are extreme impacts on the public who depend on these fish stocks for subsistence, recreational and commercial uses. There are substantial direct adverse economic impacts when these state managed fisheries have to be curtailed or closed.

The Board recommends the Council establish a hard cap on Chinook bycatch as low as possible to minimize the impact on important state managed fisheries, consistent with national standards, and for the benefit of participants specifically targeting this species.

Thank you for your consideration of our concerns in this matter.

Sincerely,



Vince Webster  
Chairman, Alaska Board of Fisheries

cc: Governor Parnell  
Commissioner Campbell, Alaska Department of Fish and Game



May 31, 2011

Eric Olson, Chair  
North Pacific Fishery Management Council  
605 W. Fourth Ave.  
Anchorage, AK 99501

RE: Agenda Item C-4 Chinook Salmon Bycatch in the GOA Pollock Fishery

Dear Chairman Olson,

Alaska Marine Conservation Council is dedicated to protecting the long-term health of Alaska's oceans and sustaining the working waterfronts of our coastal communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and families. Our ways of life, livelihoods and local economies depend on sustainable fishing practices and productive oceans. The Gulf of Alaska supports a plethora of highly-valued commercial, sport and subsistence fisheries.

Significant and unrestricted Chinook salmon bycatch has been occurring in the Gulf of Alaska for decades. This level of bycatch is unacceptable, particularly at a time when many Gulf of Alaska salmon stocks are struggling, and puts undue hardship on Alaska's commercial, sport, recreational, personal use, and subsistence Chinook salmon harvesters. It is time to address this issue by putting a meaningful limit on Chinook salmon bycatch in the pollock trawl fisheries.

We support the North Pacific Fishery Management Council moving forward with final action to set a prohibited species catch (PSC) limit of Chinook salmon in the Central and Western GOA for the directed pollock fishery. This would allow for mid-2012 implementation and be responsive to the Council's objective to reduce Chinook salmon bycatch in a timely fashion. We support the preliminary preferred alternative (PPA) of a 22,500 hard cap selected by the NPFMC as a starting point. A cap would serve as a first step at placing limitations on the waste of Chinook salmon in the GOA pollock fishery. Despite the fact that it is incumbent upon fishermen to avoid catching Chinook salmon as mandated by National Standard 9, to minimize bycatch to the extent practicable, there is no economic incentive to do so. Under a reasonably constraining bycatch limit, the pollock fleet will be motivated to avoid Chinook in order to successfully prosecute the pollock TAC. The PPA hard cap of 22,500 represents an upper limit, which is beyond the historical average and should be viewed as both a compromise and a starting point.

The genetic samples which are being collected in the GOA in 2011 will be helpful to identify which stocks are present in GOA bycatch and will supplement information provided by the coded wire tags, but without subsequent Council action of 100% Chinook salmon bycatch retention the samples do not provide a sufficient data base.

There is no doubt that lack of scientific information makes it difficult to establish management measures which identify direct results to Chinook returns in particular river systems. However, Alaska and coastal residents have benefited from precautionary management policy to sustain both the pollock and the salmon resource. The lack of scientific data to identify river of origin (and quantify direct benefits to individual river systems) is not a justification to delay measures to control bycatch. Controlling bycatch will benefit Chinook salmon even if it is not possible to exactly quantify the benefits at this time. Implementation of the proposed action to require full retention would allow NMFS the ability to sample from all of the Chinook salmon as they are sorted at the plant and allow for stock composition of the bycatch in the future. In addition, increased observer coverage on vessels under 60' will supplement this action.

Chinook salmon are a vital and essential component of our communities, our cultures and our economies in the Gulf of Alaska. There is broad support from coastal Alaskans to get Chinook bycatch under control. The Alaska Marine Conservation Council supports moving forward with final action on initial measures to reduce Chinook bycatch. We commend the NPFMC members, Council staff and the agencies and personnel who have collectively worked together to advance measures to reduce Chinook bycatch in the Gulf of Alaska.

Sincerely,



Theresa Peterson  
Kodiak Outreach Coordinator

May 31, 2011

North Pacific Fishery Management Council  
605 W 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252  
VIA Fax: 907-271-2817

Dear Council Members:

My family has relied on chum salmon caught in the Eldorado River (Nome Subdistrict) since our father moved family from Wales to Nome via skin boat about 1945. Each year about the 5<sup>th</sup> of July we (8 children and Mom) would move to summer camp at Nuuk, 18 miles East of Nome, we would then boat with our grandmother, one of Mom's siblings and their family to Eldorado to camp in wall tents, seine and dry salmon for 2 – 3 weeks. When all were dried and ready to be stored, the fish were distributed to family representatives, in bundles of 25 salmon and we would move back to Nuuk and then to a berry picking camp till school started in September.

During those times away from town, we learned traditional ways, to live off the land, to watch wildlife and birds, to listen to leaders who lead us in a joint multi-family effort.

Those opportunities to be a part of an important joint extended family effort to put away salmon for the family are no longer available for our children and grandchildren.

The North Pacific Fishery Management Council (NPFMC) must follow 10 National Standards of the Magnuson-Stevens Act. I encourage the Council to take to heart the standard number 8 in Conservation and management measures shall: "Take into account the importance of fishery resources to fishing communities to provide for the sustained participation of, and minimize adverse impacts to, such communities..."

Our communities in the Norton Sound and Nome Sub-districts have endured fishing restrictions, fishing closures, delayed start up of permitted fishing, reduced escapement goals as fisheries managers' tried various ways to protect the low returns and conserve salmon. We have had years in which under a dozen families in Nome were given permits to harvest chum salmon through the Tier II system, in which applications are submitted, people are given points as to their reliance on the resource. Even with these permits in hand families had difficulty in putting enough chum salmon away in good eatable condition. Partly this is due to the delayed start time for fishing, as managers



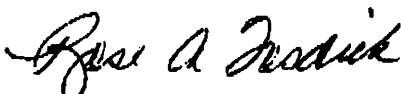
waited for the escapement numbers to be reached. By the time fishing is permitted, the rainy season had set in which is late July through most of August.

This while commercial fishermen in Southern Bering Sea harvest chum salmon, returning to our rivers, and not their intended catch. We cannot fathom the waste of chum salmon, which are multitudes higher in number than subsistence harvest. In reviewing commercial, subsistence and sportfish chum salmon harvest in Subdistricts 1 – 6, Norton Sound District in the years 1961 – 2009 as compared to the total non-Chinook salmon bycatch (1991 – 2009) in the BSAI Pollock direct fishery we notice that in 2003 the bycatch of chum salmon (700,000) was two times higher than the highest intended harvest of chum salmon in 1983 (350,000).

Recently Norton Sound Health Corporation initiated a study on our traditional diets, good and bad cholesterol, cardiovascular disease. The following is taken from the lay summary of *Lipoprotein subfractions and dietary intake of n-3 fatty acid: The GOCADAN study*. "The cholesterol particle profile was found to improve with diets that were higher in omega-3 fatty acids from fish. People following a traditional diet eat more omega-3 fatty acid and less simple carbohydrates and sugar, while those with a more Western lifestyle often eat more simple carbohydrates and sugar. Our results support the benefit of eating fish."

We believe we have been treated unfairly and without thought to our well being, our traditional diet. We encourage the NPFMC, as you make your decision, to minimize the impact to the local people who have generations of use and reliance on chum salmon.

Sincerely,



Rose A. Fosdick  
P.O. Box 1485  
Nome, Alaska 99762



March 31, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 W. Fourth Avenue, Suite 306  
Anchorage, AK 99501-2252

Dr. James Balsiger, Regional Administrator  
NOAA Fisheries, Alaska Region  
709 West Ninth Street  
Juneau, AK 99802-1668

**RE: Gulf of Alaska Chinook Salmon Bycatch**

Dear Chairman Olson, Dr. Balsiger, and Council Members:

Oceana commends the North Pacific Fishery Management Council for its commitment to reduce Chinook salmon bycatch in the Gulf of Alaska pollock fishery. We urge you to follow through and take final action to set a prohibited species cap limit of 15,000 Chinook salmon for the directed Gulf of Alaska pollock fishery at this June 2011 meeting.

Oceana supports Alternative 2, which would establish a prohibited species cap limit of no more than 15,000 Chinook salmon for the directed pollock fishery. A cap of 15,000 Chinook salmon for the pollock fleet is reasonable. This allocation of Chinook salmon to the pollock fishery is more than last year's commercial harvest of Chinook in the Kodiak region, the combined Kodiak and Cook Inlet sport harvest of Chinook, or the Bristol Bay subsistence harvest of Chinook.

The EA/RIR/IRFA suggests there is not enough information to determine the effects of the pollock fishery on individual salmon stocks. It does, however, indicate an obvious and intuitive point: the lower the bycatch cap, the greater the conservation benefit to salmon. Further, Chinook harvests and Chinook abundance have been on a declining trend for over 50 years in Alaska and on the entire Pacific coast. Chinook salmon populations are in trouble, and scientists cannot understand why. The lack of information counsels strongly in favor of conservative action by the Council as it sets the amount of Chinook salmon allowed to be taken by the pollock fishery.

Endangered Chinook salmon from the Lower Columbia River, Upper Columbia River, and Upper Willamette River are killed as bycatch by the Gulf of Alaska pollock fishery. Additionally, research surveys have found endangered Puget Sound Chinook, Snake River Spring/Summer Chinook and the Snake River Basin steelhead in the vicinity of the pollock fishery. We understand that NMFS, as required by the Endangered Species Act, reinitiated Section 7 consultation in November 2010 to analyze the impacts of the Gulf of Alaska groundfish fisheries on endangered salmon. During such consultation, it is questionable whether the groundfish fisheries should be prosecuted at all.

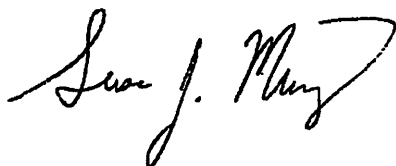
The Chinook bycatch cap should be reviewed annually to determine whether escapement goals were met, whether subsistence and commercial salmon needs were satisfied, information on the stock-of-origin of the bycatch are updated, and new insights in ocean research are incorporated. The cap should be reduced accordingly. Innovations in fishing gear and fishing techniques,

research on salmon behavior and habitat, and improvements in management could further reduce salmon bycatch on a trajectory toward zero.

Finally, funding should be secured for comprehensive management of salmon and research, including identification of the stock-of-origin and age of every salmon caught as bycatch. Funding can be generated through the Council's authority pursuant to MSA §313(g) to levy fines up to \$25,000 on a vessel as an incentive to reduce bycatch and to make these funds available to offset costs including conservation and management measures and research. Additionally, proceeds generated by allocations of fish associated with exempted or experimental fishing permits should be used as a source of funding.

Thank you again for your commitment to this issue. By reducing and minimizing wasteful bycatch, more salmon will survive to spawn in the rivers and streams of Alaska, the Pacific Northwest, and Canada. We will continue to work with you and support your efforts.

Sincerely,



Susan Murray  
Senior Director, Pacific  
Oceana

*F/V Gold Rush Fisheries LLC*  
PO Box 425  
Kodiak, Alaska 99615

31 May 2011

To: Eric Olson, Chairman  
North Pacific Fishery Management Council  
605 W. 4th, Suite 306  
Anchorage, AK 99501-2252  
Fax: 907-271-2817

Re: C-4 GOA Chinook salmon Bycatch

Dear Mr. Chairman:

We own and operate the trawler F/V Gold Rush out of Kodiak, working in the Gulf of Alaska and the Bering Sea.

Our target fisheries are Pollock, Cod, Rockfish & Soul and we also participate in the Tanner Crab fishery out of Kodiak. The health of every Alaskan fishery is extremely important to us.

We have worked steadily to control all bycatch in our fishing operation and will continue to devote resources and energy to this effort.

The issue of Chinook bycatch in the Gulf of Alaska is important and should be addressed in a careful and meaningful way, which results in a positive outcome for all of us living and working in Alaska.

As the council considers action on this issue, please remember that our fleets need useable tools and real data to control and understand Chinook bycatch.

National Standards 1, 8 and 9 lend significant direction to the outcome of this action.

We support the recommendations of Alaska Groundfish Data Bank and the Alaska Whitefish Trawlers Association.

Thank you, Mr. Chairman, for your consideration.

Sincerely,



Bert Ashley,  
F/V Gold Rush Fisheries LLC



Don Ashley,  
F/V Gold Rush Fisheries LLC

**Eric Olson, Chairman**

**North Pacific Fishery Management Council**

**605 W. 4<sup>th</sup>, Suite 306**

**Anchorage, AK 99501-2252**

**Dear Mr. Chairman,**

**I am writing in regards to the GOA Chinook salmon bycatch issue that is before the Council at its next meeting in Nome, AK.**

**I am the skipper of the F/V Cape Kiwanda and have fished around Kodiak for most of my life. I began trawling in 1989 and Pollock has always been a major component of my trawl year. Your decision regarding this issue will considerably influence the livelihoods of me, my crew, the processors and the communities where Pollock is landed.**

**My fellow trawlers and I are taking this issue in earnest and are educating ourselves and working together to keep track of and curb Chinook salmon bycatch as best we can and we still lack the efficacious tools necessary to reduce salmon bycatch with individual accountability. The Council needs to consider the consequences of their decision and balance the outcome of the bycatch control action for all the National Standards: NS1 Optimum yield, NS8 minimizes adverse impacts to fishery dependent communities, and NS9 minimize bycatch to the "extent practicable".**

**I am requesting that you be objective, acknowledge my past and present reliance on the Pollock fishery and protect my community which greatly benefits from my deliveries of trawl caught fish. Please give the trawl fleet the tools and the time to learn to control our bycatch so we can fully utilize the Pollock quota. I am requesting a Gulf-wide cap of 30,000 fish split 23,000 fish for the Central Gulf and 7,000 for the Western Gulf with implementation in 2013 concurrently with the beginning of the restructured Observer Program. It is my opinion that this should be a temporary measure until such time that we- like the Bering Sea fleet- has real tools to control and reduce our Chinook bycatch.**

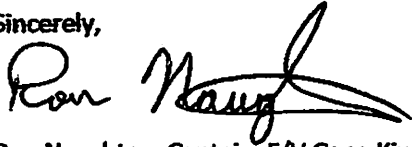
**Also, I support full retention of salmon so that there will be improved accounting and whether the Chinook are wild stock or hatchery fish. I do not believe that hatchery fish should count against a cap as these fish are, in a sense, artificially put out there.**

**Additionally, a too restrictive hard cap could produce a "race for the cap" instead of the race for the quota that we now have.**

**I and my fellow GOA trawlers believe in being responsible harvesters of our fish resources. We are striving, under the present circumstances, to control our bycatch and minimize our influence on another sector's fish.**

**Thank you for the chance to voice my concerns before the Council on Chinook salmon bycatch in the GOA Pollock fisheries.**

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Naughton". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ron Naughton, Captain, F/V Cape Kiwanda

Mr. Eric Olson, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup>, Suite 306  
Anchorage, AK 99501-2252  
Fax (907) 271-2817

May 31, 2011

Re: June 2011 Council meeting  
Agenda item C-4 – Final action, GOA Chinook salmon bycatch

Dear Chairman Olson and members of the Council:

The Kodiak Island shoreside processors, all of whom have signed this letter, depend on fishery landings year-round from all gear sectors, and support responsible fishing and management measures which promote sustainable fisheries. Pollock is an important part of our business. We are multi-species fish and shellfish processors, in addition to pollock, and care about the continued health of all the different species. As participants in the fishery and in the community, we ask for your support of an equitable and realistic final action in the Chinook salmon bycatch management decision.

The Kodiak processors have voluntarily taken a number of steps to facilitate salmon accounting in the processing plants and allow for collection of samples for genetic identification of stock of origin. We have made a substantial effort to partner with the trawl harvesters, NMFS and SeaShare. All of the Kodiak processors have agreed to participate in the SeaShare program which will allow for full retention of all salmon bycaught in Gulf trawl fisheries starting in mid-August of 2011. This will allow genetic sampling for all vessel landings in our plants to start immediately – as well as donation to food banks of food-grade salmon.

In addition, the processors are committed to working cooperatively with the North Pacific observer program to improve Chinook salmon census accounting which could include having processor crew aid the observers in the plants and having all salmon from unobserved vessels held separately by vessel until the plant observer can take genetic samples. The plants will also continue to work to educate their fleets regarding vessels' trip-by-trip bycatch counts.

The pollock trawl fishery supplies all of our plants with an important component of our processing operations in Kodiak, and supports an indispensable aspect of our marketing plans. Our pollock processing operations in turn provide an intensive 24/7 work schedule opportunity for our year-round and seasonal processing workers. Depending on CPUE and pollock quotas, the pollock fishery can account for as many as 40 or 50 days of processing annually. Any long interruption or foreshortening of this important part of our season would have negative consequences for processing operations and the people and community who depend on them.

The analysis suggests that impacts of a pollock season closing early because of salmon bycatch would be minimal. On the contrary, the loss of an integral element of the processing year in Kodiak could be a tipping point for local year-round processing workers. The workers depend on

year-round, steady, dependable work. Loss of any processing work could result in these workers leaving our community – which would have a large impact on our town. In addition, the loss of expected pollock production could be a serious problem for companies' sales agreements and marketing plans, leading to loss of income. For some plants that are heavily pollock dependant, unpredictable pollock production could even be enough to force plant closure.

Therefore, we are most concerned that the Council's Preliminary Preferred Alternative (PPA) of a 22,500-fish hard cap proposed for the Chinook salmon bycatch final action is too low. This hard cap number appears to have the very real potential, especially in the Central Gulf, to cause a premature closure of the pollock fishery, which could severely impact the entire community of Kodiak, including the processors, the processing workforce, Kodiak vessel owners and crews, and fishing service and support sectors.

**We support instead a hard cap limit of 30,000 fish as a bycatch control measure for the GOA pollock fishery, divided between the Western and the Central Gulf to provide 7,000 Chinook salmon to the WGOA management area and 23,000 Chinook salmon to the CGOA management area.**

A lower hard cap that is restraining for the pollock fleet, based on less than robust PSC estimates, and that does not account for variability of both Chinook salmon abundance and pollock abundance, could be problematic for the pollock fleets and for the processing community. Also, SSL regulations in the Gulf remove the fleet's flexibility to control bycatch. Adopting a hard cap based on the ESA trigger of 30,000 fish would account for these problems and uncertainties while preventing a 2010 event from happening again.

In addition, the benefit of a lower cap to Alaskan salmon stocks and salmon users is undeterminable due to present lack of scientific data. There is no scientific data to support claims that trawl bycatch of Chinook salmon are impacting the stocks of concern in Alaska. The scientific information available in the analysis (most recently analyzed in the Alaska groundfish Fisheries Harvest Specifications Supplemental EIS (NMFS 2007a)) states specifically, "With respect to direct mortality, the 2007 analysis indicates that there is insufficient information available to directly link prohibited species catch in the groundfish fisheries to salmon stock biomass levels." The 2007 EIS also states that "There is no evidence to indicate that the groundfish fisheries' take of Chinook salmon is causing escapement failures in Alaska Rivers."

In this action the Council has not given the GOA pollock fleet the necessary tools to reduce bycatch. The original discussions seemed to indicate that the Council intended this action to control bycatch in an interim period, while the Council undertakes a more comprehensive management action that could provide tools such as individual allocation of directed catch and bycatch, as well as cooperative structures with the potential to modify behavior and reduce bycatch. Until those tools are provided, an unrealistic hard cap runs the risk of curtailing an important fishery.

Kodiak's fishery economy depends on all fisheries and gear types, and the variety of healthy resources is what allows our processing businesses, recreational fisheries and the community of Kodiak to prosper. Council actions taken without the support of scientific information run the



risk of punishing certain fisheries without any certainty of benefitting other resource users. We are asking the Council to consider the community's investment in all its fisheries, and the dependence of the processing sector on the pollock fishery.

Thank you for your consideration.

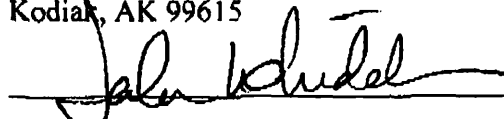
Sincerely,

International Seafoods of Alaska, Inc.  
P.O. Box 2997  
Kodiak, AK 99615




By: Mitch Kilborn  
Its: Plant Manager

Pacific Seafood Kodiak  
317 Shelikof Street  
Kodiak, AK 99615



By: John Whiddon  
Its: General Manager

North Pacific Seafoods (dba Alaska Pacific Seafoods)  
627 Shelikof  
Kodiak, AK 99615



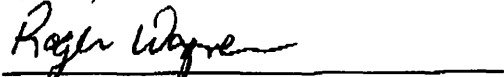
By: Matthew Moir  
Its: Plant Manager

Ocean Beauty Seafoods, Inc  
621 Shelikof Street  
Kodiak, AK 99615



By: Tim Blott  
Its: Plant Manager

Trident Seafoods Kodiak  
111 Marine Way  
Kodiak, AK 99615



By: Roger Wagner  
Its: Asst Plant Manager

Westward Seafoods  
521 Shelikof Street  
Kodiak, AK 99615



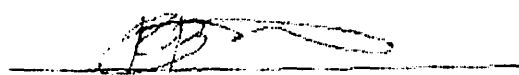
By: Darren Rudger  
Its: Plant Administrator

Global Seafoods North America  
820 E. Marine Way  
Kodiak, AK 99615




By : Sergey Morozov  
Its: Plant Manager

Alaska Fresh Seafoods  
105 Marine Way  
Kodiak, AK 99615



By: Rey Blanco  
Its: Plant Manager

Kodiak Fish Meal Company  
915 Gibson Cove Road  
Kodiak, AK 99615



By: Dan James  
Its: Plant Manager

May 31, 2011

To: Eric Olson, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup>, Suite 306  
Anchorage, AK 99501-2252  
Fax: 907-271-2817

Re: C-4 GOA Chinook salmon Bycatch

Dear Mr. Chairman:

Thank you for the opportunity to comment before the Council on Chinook salmon Bycatch in the GOA Pollock fisheries.

My name is Al Burch and I have fished out of Kodiak since right after the 1964 Earthquake destroyed Seward's waterfront. I still own and manage the Kodiak-based, family-operated trawlers Dawn and Dusk. During the nearly 30 years I spent on the Council's Advisory Panel I always made my decisions based on my strong belief that the best decisions are based on the best scientific information available, and what was best for the shore based communities dependent on the fisheries.

We were the pioneers of the pollock fisheries in the 1970's and, having helped develop the fishery, now rely very heavily on the income earned from these fisheries.

The fleet is taking this issue very seriously and are educating ourselves and working together to monitor and control Chinook salmon bycatch as best we can but we still lack the effective tools necessary to reduce salmon bycatch with enforceable individual accountability. The Council needs to consider the impacts of their decision and balance the outcome of the bycatch control action for all the National Standards: NS1 Optimum yield (catch the available pollock quota), NS8 minimize adverse impacts to fishery dependent communities (both pollock dependent communities and salmon dependent communities), and NS9 minimize bycatch (Chinook salmon) to the "extent practicable".

I am asking that you be fair, recognize my extensive history and dependence on the pollock fishery and protect my community which thrives on the trawl-caught fish. Please give the fleet the tools and the time to learn to control our bycatch so we can fully prosecute the pollock fisheries. I am requesting a gulf-wide cap of 30,000 fish split 23,000 fish for the Central Gulf and 7,000 for the Western Gulf with implementation in 2013 to coincide with the start up of the newly restructured Observer Program. I believe that this action should be an interim measure only until such time that we - like the Bering Sea fleet - have real tools to control and reduce our Chinook bycatch.

My boats and crew spend a lot of money on observers, fuel, mooring, groceries, boat supplies and maintenance, equipment and retail services, entertainment. Our working boats support seven Kodiak families and our year-round deliveries keep the resident Kodiak processing workforce employed year round.

Thank you.



Al Burch

# PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-4 GOA Chinook Salmon Bycatch

NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
<del>1</del> <del>Don Woodruff</del>	<del>Easton Fisheries</del>
<del>2</del> Joe Plesha	TRIDENT SEAFOODS
<del>3</del> Kurt Cochran	
<del>4</del> Bob Vrueger	AWTA
<del>5</del> Mike Alfieri	FV OCEAN STORM
<del>6</del> STOIAN IANKOV	F/V Michelle Renee G.A.A.
<del>7</del> Tom Evich	FV Kaven Evich
<del>8</del> Heather McCarty	Pacific Seafood/Ordiale
<del>9</del> Pete Wadin (from Dorothy children)	Fisherman
10	
<del>11</del> Margaret Hall	FV's Progress & Vanguard
<del>12</del> Julie Benny	AGDB
<del>13</del> Theresa Peterson	AMCC
<del>14</del> Nancy Fitzbrand	Pioneer Stepan Fisheries
15	
16	Charlene
17	
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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.



PACIFIC SEAFOOD PROCESSORS ASSOCIATION

Est. 1914

June 6, 2011

Mr. Eric Olson, Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

**Re: June 2011 NPFMC Meeting - Agenda item C-4 GOA Chinook salmon Bycatch**

Dear Chairman Olson:

The Pacific Seafood Processors Association (PSPA) is a trade association representing shore based and floating seafood processing companies with operations in the Gulf of Alaska, Bering Sea/Aleutian Islands, and Bristol Bay areas of Alaska. We recognize and share the concern about Chinook salmon bycatch in the GOA pollock fishery, and want to work constructively with the council to find the most reasonable and effective ways to minimize bycatch to the extent practicable, while also obtaining optimum yield from the pollock fishery.

The Chinook bycatch action under consideration will impact our member companies. The extent of the impact is difficult to determine due to a number of unknowns and variables, as discussed below.

The council's analytical document describing the issues and alternatives relative to this action includes discussion of potential impacts to processors. Our comments are focused primarily on those sections of the analysis document. On page 72, three issues related to processor costs are identified: "The first is how can processors utilize outside workers that are brought in to process pollock if the pollock fishery closes early? The second is impacts on markets, if processors are unable to fulfill contracts because the pollock fishery is closed early. Finally, the third issue is how fixed costs per unit of production are increased if the season is shortened because the PSC allowance was reached before the TAC was taken."

We will comment on those issues in some detail below.

Impacts of early closures on processing workforce

First, with regard to how processors might utilize workers brought in to process pollock if the pollock fishery closes early, the action under consideration by the council has the potential to impact all workers involved in processing and producing products from pollock, including local employees and those that are brought in due to a limited local workforce. Impacts could affect employment related to food, fish oil, and fishmeal products.

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1900 W. Emerson Place  
Suite 205  
Seattle, WA 98119  
Phone (206) 281-1667

222 Seward St  
Suite 200  
Juneau, AK 99801  
Phone (907) 586-6366

5849 Aspen Wood Ct  
McLean, VA 22101  
Phone (703) 534-2705

The document states, "The question is 'How can processors best utilize their workforce if the Pollock fishery closes early due to regulatory action,' " and notes that processors are often situated in locations where a sufficiently large local workforce is not available, requiring that many workers must be brought in from elsewhere to process the pollock harvest. It is important to recognize that recruiting those workers and flying them to the plants requires significant effort and investment by processors. Additionally, those workers, and locally-hired workers, are hired with the mutual expectation and, in some cases, contractual obligation of a particular duration of employment. An early shutdown of the fishery would cause early layoffs for workers as pollock is a high volume fishery and processors would have no need for such a large workforce at that time in those places. This could result in significant negative economic impacts to both workers and processing companies.

In the case of a local workforce in a community such as Kodiak early fishery closure would likely have additional community unemployment and social consequences associated with the loss of wages circulating in the community, and individual job loss. Year round employment is the key to sustaining and retaining these local workers, some of whom have worked in the Kodiak processing sector for decades. Pollock is an important fishery to the workforce since it provides large earning potential and employment during times of year when other fisheries may not be open or are producing low volumes.

In discussing the impact of an early closure on one of the highest value fisheries in the GOA the document suggests that options exist for the redistribution of employee time and effort, particularly in the case of a multi-species plant. While there is some potential for the redistribution of idled employee effort there is no amount of "make work" that can make up for the unrecoverable lost revenue that was the basis for the hiring of the employees in the first place. It is true that, to the extent practicable, processors do, as the analysis states, "attempt to keep crews active and employed," (Pg. 73) However, with an idled workforce of the size that would be impacted by early closure of the pollock fishery, it is simply unrealistic to expect that processors would be able to keep such a large number of employees "busy" in any way that is meaningful or cost effective. The analysis document provides no evidence that they could.

#### Impacts of early closures on processors and markets

The impacts of the salmon bycatch action under consideration could have be especially harmful to the pollock industry and those who rely on it due to the fact that the action is being taken, and is scheduled to be implemented, during a time of increasing biomass of pollock in the GOA. This combination increases the possibility of an early closure. Pollock represents the most economically important fishery in the GOA to the processors that buy pollock. The threat of closure of the fishery is serious and could affect the overall operation and economic health of the plant and/or company.

As pointed out in the analysis document, a reduction in fishery value could occur due to reduction in volume caused by an early closure, and the associated potential for further future reduction in value due to market impacts from the failure to deliver promised quantities. We would add that pollock is not, for the most part, sold into small or "niche" markets. It is a high volume, low cost protein, that goes into markets that require large, reliable quantities of fish.

Further, early closures could cause employees to seek other opportunities in the future which would increase costs associated with recruitment, training, and retention of employees, thus raising operating costs for processors in subsequent seasons.

### Impacts of early closures on communities

In addition to the direct negative impacts on processing companies and workers that may result from early closure of the pollock fishery, processing activity provides a major source of revenue to communities and community services in the towns where pollock is processed. The risk to this revenue stream and the private and public sector jobs supported by fishery revenue must be considered. Revenues generated by processing activity are and will be increasingly important to communities as they face declining federal support for basic services such as transportation, education, and social services due to federal deficits and budget reductions. The analysis of National Standard 8 (page 202) suggests that community impacts are under the level of significance, stating, "Further minimization of adverse economic impacts to any given community is not relevant." We believe that is an inaccurate assessment.

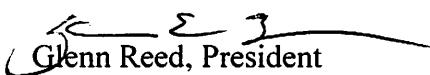
### Conclusions and recommendations

There is little or no evidence that the negative impacts of a restrictive bycatch hard cap, some of which we've described in our letter, would be offset or justified by any significant benefits to Chinook salmon stocks or those who rely on them. As stated on page xv of the Executive Summary of the May 2011 EA/RIR/IRFA: "It is not possible to draw any correlation between patterns of prohibited species catch and the status of salmon stocks, especially given the uncertainty associated with estimates of prohibited species catch in the groundfish fisheries, and the lack of data on river of origin of Chinook salmon caught in the prohibited species catch. There is also no evidence to indicate that the groundfish fisheries' take of Chinook salmon is causing escapement failures in Alaska rivers."

The hard cap being considered in the PPA of 22,500 salmon is lower than the established ESA threshold of 30,000. Given the lack of evidence of potential benefits to offset virtually certain losses that would result from an overly restrictive hard cap, as described above, we believe a more appropriate approach would be to establish a hard cap of 30,000. This would immediately preclude a high bycatch event such as that experienced in 2010 and provide time for the fishery to implement systems to control bycatch and work toward further reducing bycatch in the future. We believe this approach would better meet the National Standards of the Magnuson-Stevens Act.

Because the council is currently focused on the narrow question of establishing a bycatch hard cap in the GOA pollock fishery, we have attempted to provide constructive comments on that question. However, we believe it is important to recognize that implementing a bycatch hard cap in an open access, Olympic style fishery -- where no sector, co-op, or individual vessel level distribution of the cap is in place -- creates a situation where a "race for bycatch" could occur. Without additional measures, such as cooperative fishing and/or vessel level bycatch limits, the current GOA management system does not create a situation conducive to best achieving effective results from implementation of a hard cap.

Sincerely,

  
Glenn Reed, President  
Pacific Seafood Processors Association



## **Captain Pete's Alaska**

P.O. Box 3353

Homer, AK 99603

June 8th, 2011

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
P.O. Box 103136  
Anchorage, AK 99510

RE: Agenda item C-4 Final Action on GOA Chinook Salmon Bycatch in Pollock Fishery

Dear Chairman Olson and members of the Council:

As a small business owner and operator in Homer, I am acutely aware of the importance of Chinook Salmon to the fishing community here. Not only do we harvest these fish for our own food, but my charter business depends on these fish for not only a portion of our summer season, but they are a critical and only attraction for our limited business in winter. In winter, the very same fish that the trawler fleet are wasting in the Gulf of Alaska pollock fishery make up the majority of what is available to our winter clientele. Most of these fishermen are Alaskans. In spring and early summer, we depend on these fish when halibut stocks are still migrating in and the few king salmon that we catch are an important incentive to those that wish to fish before the crowds arrive for the summer season. Without these king salmon, there would be no shoulder season which supports those of us that live here year around.

I know that the pollock quota is set to increase and if it does, there will likely be more Chinook bycatch if present practices are adhered to. The idea of a cap, and a cap that would represent less bycatch, not more or average, would be to minimize the effect this waste has on the stakeholders that depend on Chinook salmon for a very important wintertime income. No matter where we find out these kings come from, this waste comes out of someone's oven or pocketbook. Every fish is precious and important to someone, so should not be allowed to be wasted. I believe MSA provides for your direction in minimizing this waste.

I was encouraged when you passed a preliminary alternative of 22,500 Chinook salmon as a cap in the Gulf of Alaska, but am hoping that you reconsider and adopt the 15,000 cap. A number less than the ten-year average is the only meaningful move that would send a clear message that you want the behavior of the trawl fleet to change. Anything



more than the average is an affirmation to the fleet that you feel what they are doing is just fine and go ahead with the waste of this valuable resource. In conversations with fishermen from a broad spectrum of the Alaskan fishing fleets, there is none that thinks this waste can continue. It is time to reign in this behavior and regardless of how big the boats, or corporations, these fish are an important source of food for the people that live in the communities that you represent and it must be stopped. From testimony I have heard at the Council meeting this year, it is apparent that the crews of these trawl vessels know how to avoid this bycatch and it is your job to make it happen. It would be an easy thing for you to re-examine your action at a future date and adjust this cap as needed, but to allow any more than the average amount would send the wrong message to the fleet.

With observer restructuring on the horizon and a provision for full-retention, the preferred alternative is really the only meaningful action you can take as a final rule. I would urge you to consider the 15,000 cap as a reduction of the average and thus being a better choice. I would also urge that this cap be put in effect mid-season 2012 or as soon as possible and not delayed until the 2013 season.

Thank you!

Pete Wedin

Capt. Pete's Alaska

Homer

Web posted Friday, November 5, 2010 **Electronic eyes on deck: EM tech expands in fishing fleet**

Alaska Journal

**By Andrew Jensen**

*Alaska Journal of Commerce*

Gregg Williams, senior biologist with the International Pacific Halibut Commission, said electronic monitoring technology is mature and ready to be deployed in Alaska.

Electronic monitoring, or EM, is a closed-circuit television system that records to a digital hard drive on board a vessel and can include any number of cameras positioned at any place.

For the purposes of monitoring a fixed-gear vessel fishing for halibut, EM cameras activate when the hydraulics begin to reel in the catch, but cameras can also be used on the stern of a longliner to make sure it is carrying the proper bird-avoidance gear.

The North Pacific Fishery Management Council and the National Marine Fisheries Service, or NMFS, simply must decide what they want, Williams said, on issues like the level of infrastructure needed to support it (such as offices in major ports), whether to lease or buy the monitoring equipment, how much of the video will be reviewed after each trip, and so on.

In the British Columbia halibut fishery, where vessel owners have a choice between electronic monitoring or carrying observers, about 80 percent to 90 percent have chosen electronic monitoring over the last five years.

While there are up-front costs for installation of equipment, Williams said over a four-year to five-year amortization, the costs of carrying human observers are much higher.

Archipelago Marine Research of British Columbia, the undisputed leader in EM dating to 1992, has deployed its technology in about a half-dozen fisheries around the world along with pilot programs in New Zealand, Australia, Hawaii and Alaska.

AMR director Howard McElderry said EM has been deployed on vessels as short as 15 feet fishing for fresh rockfish. He said up-front capital costs can range from \$8,000 to \$10,000, depending on the system.

In the B.C. halibut fishery, AMR deployed its equipment successfully within a year to a 100 percent coverage level, but McElderry noted that two to three years of preparation came first.

"Fishermen are part of the solution," he said. "It's not top down. You're providing a tool and working with them so it fits into their way of doing things."

The "all-in cost" — counting all tech support, equipment and infrastructure — averages out to about \$190 per day in the B.C. halibut fishery. AMR systems have GPS and, for remote fisheries deployment, satellite transceivers to aid

tech support.

AMR has a 24-hour tech support line and most problems can be resolved over the phone. Incidents where vessels have had to return to port because of equipment failure have numbered in the single digits.

"Our experience is the majority of problems can be talked through," McElderry said. "Often the problem is related to power source or a wire shorting out or something like that. Very often there's enough information through the user-interface that you can troubleshoot it."

Another issue for NMFS to decide would be whether electronic monitoring is the carrot or the stick in observing fishing behavior.

In the B.C. halibut fishery, EM is the "carrot," Williams said. The primary monitoring tool is the skipper's logbook, where he or she records total catch from each set and all bycatch. Because the catch can be logged at the dock, the main thrust of EM is to record bycatch.

When a vessel returns to port, a technician removes the video hard drive from a tamper-proof box and a random sample of the catch is reviewed.

If the random video review matches the logbook, the rest of the logbook data is taken at face value. If the review doesn't match what the skipper reported, the entire trip is reviewed and the operator is charged for the cost.

"To have person in front of a screen looking at every fishing event can be quite pricey and (the skipper) has to pay for that," Williams said. "That's the incentive to be accurate in his logbook reporting."

There are technical issues with EM deployment, but Williams noted that studies have shown neither EM nor observers achieve 100 percent coverage. Human observers, due to weather or seasickness, often do not witness all fishing events.

Studies, including a four-vessel study in the Alaska halibut fishery, have shown EM is an accurate tool for monitoring both catch and bycatch. Improved camera technology has allowed for more accurate species identification, and the Alaska study noted improved training for reviewers would improve accuracy.

McElderry said he expects "computer vision" — programs that can identify different fish species automatically — will become more widely available in the next few years.

Overall, data collection for AMR was in the "high 90s," McElderry said. In the crab fishery where it's deployed, data collection is 99 percent.

"The technology is well enough advanced that you shouldn't expect less than 98, 99 percent collection success," McElderry said. "It's quite reliable in that respect."

Andrew Jensen can be reached at [andrew.jensen@alaskajournal.com](mailto:andrew.jensen@alaskajournal.com).