



Tending to our Future

Alaska Independent Tenderman's Association

P.O. Box 431, Petersburg, Alaska 99833

March 28, 2013

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

RE: D-1 (a) Round Island Transit

Dear Council Members,

The Alaska Independent Tenderman's Association is an organization representing a diverse group of tender owners, operators and crewmen from Oregon to Alaska with vessels ranging from small wooden river scows to large steel crabbers. Our mission is to put forth one unified voice to the issues that affect tendering operations in Alaska.

Commercial fishing tenders that have a FFP are in a very difficult position when it comes to the Togiak Herring fishery conducted by the State of Alaska. Many of these tenders have participated in this fishery for decades. Due to Component 9 to GOA FMP Amendment 83 they risk losing their FFP to participate in this fishery. Until recently a tender could "surrender" their FFP which would allow them to transit Walrus Protection Zones during tendering operations in Togiak. When tendering in Togiak is over, they could reapply for their FFP. This is no longer possible due to regulation change. They can only be issued one (1) permit in a three (3) year period.

The Togiak district is from Cape Constantine to Cape Newenham. There are six sections within the district. Normally the fishery is conducted in near shore waters where you will find the fishermen. The tenders on the other hand will remain offshore and adjacent to the fishing grounds drifting or jogging to remain out of the way of the fisherman until needed. There has been many a time that a tender has married up to a purse seine vessel to pump out the set to find they are drifting offshore with the currant while taking care of twisted herring set.

We would like to see a waiver instituted for those tenders that have a FFP that participate in the Togiak herring fishery. The waiver could be renewed each year or given for a set period time. We believe that the tools are already there for oversight of those tenders through the VMS system. Once a tender is given a waiver they can declare on their VMS units that they are tendering herring in the Togiak district. Geo-fencing and increased Polling rates might also be considered to ensure the tender is abiding to its waiver. This should ease the concerns that NOAA enforcement has with enforcing the federal regulation and would allow the tenders with FFP's to continue to participate in the Togiak herring fishery.

We do not feel that limiting access routes to anchorages for certain vessels in the event of inclement weather is a good idea. Tenders without a FFP can take a direct route to a safe anchorage while FFP vessels caught in the same storm may have to run a trough or shoal waters to make for the same safe harbor. That would create dangerous situations.

Thank you for taking the time to hearing our concerns in this matter.

Respectfully yours,

Lisa Terry

Lisa Terry
Executive Director
Alaska Independent Tenderman's Association

D-1(a) Round Island

D-1(a)

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: ~~D-1(a) Round Island~~ ~~SAEE~~ Round Island Transit

NAME (PLEASE PRINT)		TESTIFYING ON BEHALF OF:
1	VINCE O'Shea	PSPA
2	Jason Anderson	AKSC
3	Todd Loomis	Ocean Peace
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

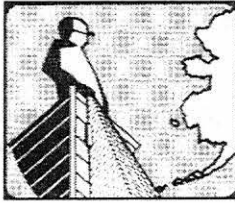
NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited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

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: D16 SABLEFISH TACS

NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Chad See
2	Frezer Longire Coalition
3	Don Benson
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

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



Bering Sea Fishermen's Association

1130 West 6th Avenue, Suite 110

Anchorage, Alaska 99501

(907) 279-6519 or (888) 927-2732

FAX (907) 258-6688

Testimony of Art Nelson to the North Pacific Fishery Management Council April 7, 2013

In light of the recent BSAI Chinook bycatch genetics presentation from Dr. Guyon, I think it would be valuable to the Council if I provided you with some information about the stock status of western Alaska's Chinook salmon, with a focus on what has changed since the Council adopted amendment 91 in early 2009.

A lot has changed since the Council acted and in light of these disturbing trends we feel it is appropriate to re-evaluate the bycatch measures. It is not necessarily a concern over Chinook bycatch at levels like we have seen in 2012, but it is a dire concern over the potential occurrence of a bycatch spike that. As we know, a spike can occur at any time like we saw at the end of 2011 when the pollock fleet ran up a significant bycatch tab in a very short time at the end of the "B" season, and there certainly was not an overall high abundance of western Alaska Chinook stocks at that time. At these current levels of Chinook salmon abundance in western Alaska, a bycatch spike at levels approaching the hard cap, or even at levels below the performance standard will have dire effects on the ability to manage for escapements and to provide for minimum subsistence needs.

Norton Sound

Norton Sound had been experiencing depressed Chinook salmon runs at the time AM91 was passed by the Council, but that trend has continued and actually have become worse. Runs had already fallen significantly, with no directed commercial fishery since 2001, but "Since 2007, king salmon runs have declined 55%, to an average of 5,168 fish, **including the lowest run on record in 2012** (2,768 fish). (Kent and Bergstrom, 2012, page 5 and table 1)

The Alaska Board of Fisheries has designated the eastern Norton Sound Chinook salmon stocks (subdistricts 5 and 6) as stocks of concern since 2004. (Kent and Bergstrom, 2012)

The North River 's counting tower is one of the major indexes for inseason management in eastern Norton Sound. The escapement goal (currently a SEG @ 1,200-2,600) has been met in only 2 of the last 5 years, and met in only 3 of the last 9 years. (since established, met in 1999, 2001, 2003, 2003, 2007, 2009, 2010). (Kent and Bergstrom, 2012, Figure 2)

"Combined commercial king salmon harvests for subdistricts 5 and 6 averaged 7,131 per year for the historical period 1989-1998 (Table 2). Commercial harvests over the recent 5 year (1998-2012) period averaged 127 king salmon, which represents a 98% decline from the historical commercial average. However, these fish were not caught in a directed king salmon fishery. Since 2001, the commercial harvest of king salmon has been incidental to directed chum, pink and coho salmon fisheries, except for a small directed commercial harvest of king salmon in 2005." (Kent and Bergstrom, 2012, page 4 and table 2)

"Subdistricts 5 and 6 subsistence harvests averaged 1,547 king salmon from 2008-2012, a 67% decline from the 1004-1998 average subsistence harvest of 4,624 king salmon." (Kent and Bergstrom, 2012, page 4 and table 2)

Serving western Alaska small boat fisheries since 1980

"Additionally, the average combined harvest (commercial and subsistence) of both subdistricts 5 and 6 from 2008-2012 (1,674 king salmon) decreased 86% from the historic 1994-1998 average combined harvest of 12,217 king salmon." (Kent and Bergstrom, 2012, page 5, table 2 and figure 6)

Unalakleet River sport harvest: "The recent 5-year (2007-2011) average king salmon catch of 544 king salmon, which includes fish that were released, in addition to fish harvested, dropped by 63% from the average 1990-1998 average catch of 1,489 king salmon." (Kent and Bergstrom, 2012, page 5)

Yukon

While the Yukon River's Chinook stocks had been in decline, it had only experienced one recent and severely weak run (2008) prior to the Council's adoption of Amendment 91. The trend has continued to decline, with 2011 and 2012 being among the worst runs ever observed.

US Department of Commerce disaster declaration has been made every for every single year for the past 5 years (2008-2012). (USDOC website)

The Alaska Board of Fisheries has designated the Yukon River Chinook salmon stock as a Stock of Concern since 2000. (Schmidt and Newland, 2012)

"Poor runs observed since 2007 do not appear to be related to poor escapements. Parent year escapements in 2001-2006 were mostly above average and nearly all escapement goals were met." (Schmidt and Newland, 2012)

No directed commercial fishery for Chinook salmon since 2007. Recent 5 yr (2008-2012) average commercial Chinook harvest of Yukon River Chinook salmon is down 96% from long term average (1980-2007). (Schmidt and Newland, 2012)

Failed to deliver negotiated treaty obligation for Chinook salmon into Canada in 3 of last 5 years (and Canada typically produces 50% of the entire Yukon drainage Chinook salmon return). (JTC, 2013)

The Yukon River area typically has the second largest subsistence harvest of Chinook salmon (after the Kuskokwim area), and in 2007 subsistence harvest of Chinook salmon in the Yukon River area represented 35% of the Statewide subsistence harvest of Chinook salmon. (Fall, et al, 2009)

Amount necessary for subsistence (old, 45,500-66,704) failed to achieve minimum of range every single year for last 5 (since 2008), missed by nearly 50% in recent years. (note: 2012 is estimated based on personal communication with ADFG staff as subsistence harvest numbers are not yet final). (Brown and Jallen, 2012)

Kuskokwim River

At time of Am91, the Kuskokwim River didn't appear in as serious trouble as Norton Sound's chronic problem, nor the Yukon's recent (at the time) serious, developing problems. Since that time however, the River appears to have suffered at least two of the worst runs ever observed (2010 and 2012).

The Kuskokwim drainage typically has the largest Chinook salmon run in Alaska, and the Kuskokwim Area also typically has the largest subsistence, by area, of Chinook salmon statewide. In 2007, the Kuskokwim area represented 45% of the statewide subsistence harvest of Chinook salmon. (Fall, et al, 2009)

Failed to meet minimum ANS for the Kuskokwim River drainage (64,500-83,000 in Kusko drainage, revised by BOF 2013) for 2011 and 2012. Note: 2012 are numbers not yet final, but indications are that it might have been missed the minimum by as much as 60%, based on personal communication with ADFG staff. (Ikuta, 2012)

Literature Cited:

Brown, C. and D. Jallen. 2012. Options for amounts reasonably necessary for subsistence uses of salmon: Yukon Management Area; prepared for the January 2013 Anchorage Alaska Board of Fisheries meeting. Alaska Department of Fish and Game, Division of Subsistence Special Publication No. BOF 2012-08, Fairbanks.
http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2012-2013/ayk/sp2_sp2012_008.pdf

Fall, J.A., C. Brown, M.F. Turek, N. Braem, J.J. Simon, W.E. Simeone, D.L. Holen, L. Naves, L. Hutchinson-Scarborough, T. Lemons, V. Ciccone, T.M. Krieg, and D. Koster. 2009. Alaska subsistence salmon fisheries 2007 annual report. Alaska Department of Fish and Game Division of Subsistence, Technical Paper No. 346, Anchorage.
<http://www.subsistence.adfg.state.ak.us/techpap/TP346.pdf>

Ikuta, Hiroko. 2012. Options for amounts reasonably necessary for subsistence uses of salmon: Kuskokwim Area; prepared for the January 2013 Anchorage Alaska Board of Fisheries meeting. Alaska Department of Fish and Game Division of Subsistence Special Publication No. BOF 2012-07, Fairbanks.
http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2012-2013/ayk/sp2_spP2012_007.pdf

JTC (Joint Technical Committee of the Yukon River US/Canada Panel). 2013. Yukon River salmon 2012 season summary and 2013 season outlook. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report 3A13-02, Anchorage.
<http://www.adfg.alaska.gov/FedAidPDFs/RIR.3A.2013.02.pdf>

Kent, S. M. and D. J. Bergstrom. 2012. Norton Sound Subdistrict 5 (Shaktoolik) and Subdistrict 6 (Unalakleet) king salmon stock status and action plan, 2013: a report to the Alaska Board of Fisheries. Alaska Department of Fish and Game, Special Publication No. 12-28, Anchorage.
http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2012-2013/ayk/sp12_28.pdf

Schmidt, S. N. and E. Newland. 2012. Yukon River king salmon stock status, action plan and summer chum salmon fishery, 2012; a report to the Alaska Board of Fisheries. Alaska Department of Fish and Game, Special Publication No. 12-30 Anchorage.
http://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2012-2013/ayk/sp12_30.pdf