

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: D-2 Staff Tasking

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
X 1	Paul A. Shaghorn 4th	KPFA D(1)(b)
X 2	DAVE GOLDSTEIN	PWS Eco-CHARTERS
X 3	Karin Holser	Pinklof Island Stewardship An key Cals recom
X 4	Rhonda Hubbard	Self
X 5	JACKIE DRAGON	GREENPEACE
X 6	Dorothy Childers	AMCC
X 7	Kenny Down	Freezer Longline Coalition
X 8	Merrick Burden	Marine Conservation Alliance
X 9	Tacon Anderson	Alaska Seafood Coop.
X 10	Stephen Taufen (Lu Dochtermann)	FV STORMBIRD, FV NORTHPOINT
X 11	Vernor Wilson	WWF
X 12	Julia Pennig	ALPB
X 13	Jeff Stephon	UFMA
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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.

DRAFT NPFMC THREE-MEETING OUTLOOK - updated 12/12/11

January 30 - February 7, 2012 Seattle, WA	March 26 - April 3, 2012 Anchorage, AK	June 4 - 12, 2012 Kodiak, AK
SOPP: <i>Review and Approve</i> SSL CIE: <i>Review Terms of Reference</i> IPHC Report	Halibut CSP: <i>Review and action as necessary</i>	
		Halibut workshop report: <i>Review</i>
GOA Halibut PSC: <i>Initial Review</i>	GOA Halibut PSC: <i>Final Action</i>	
GOA Pacific cod A-season opening dates: <i>Discussion paper</i>		
GOA Pollock D-season: <i>Discussion paper</i>	P.Cod Jig Management: <i>Review Progress</i>	
CQE in Area 4B: <i>Final Action</i>	Northern Bering Sea Research: <i>Discussion paper</i>	
		Halibut/sablefish IFQ changes: <i>Discussion paper (T)</i> Halibut/Sablefish IFQ Leasing prohibition: <i>Discussion paper</i>
GOA Chinook Bycatch All Trawl Fisheries: <i>Discussion Paper</i>	BSAI Chum Salmon Bycatch: <i>Initial Review</i>	
	GOA Flatfish Trawl Sweep Modifications: <i>Initial Review</i>	GOA Flatfish Trawl Sweep Modifications: <i>Final Action</i>
BSAI Flatfish specification flexibility: <i>Discussion Paper</i>		
FLL Vessel Replacement: <i>Final Action (T)</i> AFA Vessel Replacement GOA Sideboards: <i>Discussion Paper (T)</i>	Grenadiers: <i>Discussion paper</i>	BSAI Crab active participation: <i>Initial Review</i> Crab Coop Agreement Provisions: <i>Discussion paper</i> ROFR Workgroup: <i>Report; action as necessary</i>
Crab EDR Revisions: <i>Final Action</i>	Scallop SAFE: Approve harvest specifications BS Habitat Conservation Area Boundary: <i>Review</i> Pribilof BKC Rebuilding Plan: <i>Final Action</i>	
BSAI Tanner Crab rebuilding plan: <i>Preliminary Review</i> BSAI Crab Model Workshop Report: <i>SSC only</i> HAPC - Skate sites: <i>Initial Review</i>	BSAI Tanner Crab rebuilding plan: <i>Initial Review</i> HAPC - Skate sites: <i>Final Action</i>	
BBRKC spawning area/fishery effects: <i>Updated Disc paper (T)</i>		ITEMS BELOW FOR FUTURE MEETINGS
<i>Groundfish PSEIS: Discuss schedule</i>		Crab PSC numbers to weight: Discussion paper Crab bycatch limits in BSAI groundfish fisheries AI P.cod Processing Sideboards: Initial Review Greenland turbot allocation: Discussion paper VMS use and requirements: Discussion paper BSAI halibut PSC limit: Discussion paper GOA comprehensive halibut bycatch amendments: Disc paper BS FLL GOA cod sideboards: Discussion paper MPA Nominations: Discuss and consider nominations
2012-2015 Deep Sea Coral Research: <i>Report</i>		

AI - Aleutian Islands
AFA - American Fisheries Act
BIOp - Biological Opinion
BSAI - Bering Sea and Aleutian Islands
BKC - Blue King Crab
BOF - Board of Fisheries
CQE - Community Quota Entity
CDQ - Community Development Quota
EDR - Economic Data Reporting
EFP - Exempted Fishing Permit
EIS - Environmental Impact Statement
EFH - Essential Fish Habitat
FLL - Freezer longliners
GOA - Gulf of Alaska

GKC - Golden King Crab
GHL - Guideline Harvest Level
HAPC - Habitat Areas of Particular Concern
IFQ - Individual Fishing Quota
IBQ - Individual Bycatch Quota
MPA - Marine Protected Area
PSEIS - Programmatic Supplemental Impact Statement
PSC - Prohibited Species Catch
RKC - Red King Crab
ROFR - Right of First Refusal
SSC - Scientific and Statistical Committee
SAFE - Stock Assessment and Fishery Evaluation
SSL - Steller Sea Lion
TAC - Total Allowable Catch

Future Meeting Dates and Locations

January 30-February 7, 2012 - Renaissance Hotel, Seattle
March 26-April 3, 2012 - Hilton Hotel, Anchorage
June 4-12, 2012 - Best Western, Kodiak
October 1-9, 2012 - Hilton Hotel, Anchorage
December 3-11, 2012 - Anchorage
February 4-12, 2013, Portland
April 1-9, 2013, Anchorage
June 3-11, 2013, Juneau
September 30-Oct 8, 2013 Anchorage
December 9-17, 2013, Anchorage
(T) Tentatively scheduled



Marine Conservation Alliance

promoting sustainable fisheries to feed the world

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Adak Community Development Corporation

Alaska Bering Sea Crabbers

Alaska Longline Co.

Alaska Whitefish Trawlers Association

Alaska Groundfish Data Bank

Alaska Scallop Association

Aleutian Pribilof Island Community Development Association

Akutan, Atka, False Pass, Nelson Lagoon, Nikolski, St. George

Arctic Storm Management Group

Bristol Bay Economic Development Corporation

Aknagik, Clark's Point, Dillingham, Eggek, Ekuk, Elwok, King Salmon, Levelock, Manskotak, Naknek, Pilot Point, Port Heiden, Portage Creek, South Naknek, Topiak, Twin Hills, Ugashik

Central Bering Sea Fishermen's Association

St. Paul

City of Unalaska

Coastal Villages Region Fund
Chefornak, Chevak, Ekik, Goodnews Bay, Hooper Bay, Kipnuk, Kongiganak, Kwigillingok, Makoryuk, Napakiak, Napaskiak, Newtok, Nighimute, Oscarville, Platsum, Quinhagak, Scammon Bay, Toksook Bay, Tunulilik, Tununak

Glacier Fish Company

Groundfish Forum

High Seas Vessels

Ocean Harvester, Sea Storm, Neahkahnie

Icicle Seafoods

North Pacific Seafoods

Norton Sound Economic Development Corporation

Brevig Mission, Diomedes, Elim, Gambell, Golovin, Koyuk, Nome, Saint Michael, Savoonga, Shaktoolik, Stebbins, Teller, Unalakleet, Wales, White Mountain

Trident

United Catcher Boats

Akutan Catcher Vessel Association
Mothership Fleet Cooperative
Northern Victor Fleet
Peter Pan Fleet Cooperative
Unalaska Co-op
Unisa Fleet Cooperative
FV Arctic Wind, FV Caitlin Ann, FV Dona Martta, FV Pacific Prince

U.S. Seafoods

Waterfront Associates

Western Alaska Fisheries, Inc.

December 13, 2011

Dear Chairman Olson,

The Marine Conservation Alliance is an organization made up of fishermen, processors, and communities involved in the groundfish, crab, and scallop fisheries of the North Pacific and Bering Sea. We have been working alongside the Freezer Longline Coalition, the At Sea Processors Association, and the United Fishermen's Marketing Association on the development of a recommendation regarding the management of groundfish fisheries under the Pribilof Island Blue King Crab (PIBKC) rebuilding plan, including two meetings which have occurred during this week's NPFMC meeting. Our goal is the development of measures which will help the groundfish fisheries potentially affected by this action to prosecute fisheries in the most orderly and rational way possible in the face of restrictive limits intended to help foster the rebuilding of PIBKC. While we do not have a formal recommendation at this time, we do have several requests for the PIBKC NEPA analysis that we hope can be addressed in time for the Council to take final action at the January/February meeting.

With that in mind, we respectfully request that you direct staff to include several perspectives and clarifications in the PIBKC analysis which are described below:

Specifying Rollover Mechanics:

The most recent version of the PIBKC analysis makes available only 4,000 lbs under the OFL. Since that document was released, the OFL was reduced by about 25%. That leaves even smaller amounts available as a trigger cap that might close additional areas to fishing, especially if the cap is sub-divided into sector allocations. The revised analysis, to be used for taking final action, could be improved by specifying how a rollover of PIBKC bycatch could be done to maximize the ability of the sectors to fish successfully in the face of this cap. Under Alternative 5, sub-option 4, closure option 5d, sub-options 3 and 4, there is an additional allocation of the cap to the trawl, pot, and hook and line gear sectors. In addition, NMFS has indicated that roll overs are a common inseason practice and that rollovers could be applied here. We recommend the following clarifying language that would guide NMFS in their rollover activities of PIBKC bycatch:

- *Allow rollover of unused PIBKC bycatch from one sector to another when a fleet has been adequately surveyed and conveyed no need for its remaining bycatch.*

Clarifying the Existing Option for Increased Observer Coverage:

The lack of accurate and vessel level catch data regarding PIBKC could prove problematic to vessels engaged in a PIBKC management arrangement. More accurate data on inseason PIBKC catch would appear necessary in order to implement a private bycatch management arrangement (more accurate data facilitates better expectations about bycatch events and usage), and this will likely need to come in the form of 100% observer coverage. For each of the Alternatives, there is an option to increase observer coverage but it lacks specificity regarding what is meant by that option. We recommend the analysis include a discussion that

assumes a 100% observer coverage requirement for vessels affected by this action while they are operating in the PIBKC accounting area (the Pribilof district).

- *Require 100% observer coverage for all fisheries which are affected by the PIBKC action while they are fishing in the Pribilof district.*

Whole Haul Sampling:

With 100% observer coverage, whole-haul sampling in the affected areas is a viable option and would improve the capacity of the fishery to self monitor bycatch and self manage that bycatch. While it may not be a viable option for all fisheries, any step in this direction will improve the data available on PIBKC and potentially provide protection to fishery participants negatively impacted by triggered closures caused by extrapolation of data from a small sample of a vessel's harvest. We recommend that the analysis of "increased observer coverage" described above include – as part of that analysis – a description of whole haul sampling and the effects of whole haul sampling.

- *Allow whole haul sampling on board vessels that can meet the necessary requirements for whole haul sampling. This would apply to all fisheries which are affected by the PIBKC action while fishing in the PIBKC accounting district.*

Seasonal Release of PIBKC Bycatch

An alternative to specifying sector based allocations of PIBKC bycatch is to specify seasonal releases of bycatch. Such seasonal releases may help foster year round fishing opportunities and prevent a "race for bycatch" from occurring which results in attainment of a trigger cap early in the year. While we do not have a recommendation on seasonal releases of bycatch versus sector based allocations of bycatch, we do request that the analysis consider and describe a seasonal release strategy. Information on how this seasonal release could occur may be based on the seasonality of target species harvest that occurs in the Pribilof district, or similar data.

- *Analyze a seasonal release strategy of PIBKC bycatch where seasonal releases may be based on the seasonality of fishing activity that occurs in the Pribilof district, or similar data.*

Discard Mortality Rates

Catch induced mortality affects stock status and in most cases some portion of discarded catch will survive. Stock assessments frequently incorporate discard mortality rates as part of the data that goes in to the assessment, yet inseason management does not incorporate these rates. In order to manage fisheries as precisely as possible, discard mortality rates could be incorporated for inseason management purposes. We understand that incorporating these rates in to the PIBKC action may not be feasible, yet we request the Council begin to consider the benefits, drawbacks, and impacts of using DMRs inseason to track the discard mortality of catch occurring in fisheries.

- *Task staff with the development of a white paper that explores the use of discard mortality rates for purposes of inseason catch tracking*

Sincerely,

Merrick Burden
Executive Director

To The North Pacific Management Council

Re: Staff Tasking on Pribilof Blue King Crab Rebuilding Plan

The Pribilof Island Habitat Conservation Zone was implemented to help ~~recover~~ the Pribilof king crab stock recover, however we must remember that the lines that became the boundary of the Pribilof Island Habitat Conservation Zone were not drawn with the knowledge available today of EFH or ecosystem approaches and were adjusted to avoid direct conflict with the distribution of groundfish fisheries.

The work of Dr. Stabeno's group at the Alaska Fisheries Science Center and Dr. Flint's group at the Russian Academy of Sciences have documented the unique oceanographic properties of Pribilof Domain. They have reported on the flow onto the shelf circling clockwise around the Pribilof Islands - this gyre draws in food and plankton, contributing to the abundance of crab, seabirds, marine mammals and forage fish. We need to recognize that the Pribilof Domain also includes the EFH for the Pribilof King crab stock.

I am concerned because of your recent action of increasing the pollack TAC, that there is going to be a lot more trawling as they try to find the fish that you heard in testimony is getting harder and harder to find. Lets be realistic this WILL have an impact on crab habitat because their nets bounce off the bottom 70% of the time. That much more habitat destroyed and crab smashed. The State of Alaska has a long record recognizing the impacts of trawling on crab - this is one reason for the ban on trawling in almost all state waters.

The Nation looks to you for progressive fisheries management. This was reiterated by Senator Begich when addressed this council. He first bragged about Alaska's great king crab, then he said "we need to get it right". You have the opportunity to do what is necessary to help Pribilof king crab stocks recover by putting ecosystem based management into action.

Toward this end, Please add alternative 4 - **Closure which covers the entire distribution of the Pribilof Island blue king crab stock** - back to the suite of alternatives for consideration. **AND, include whether a fishery does or does not meet the thresh hold quantified in your discussion, if the gear damages habitat, prey field or the crabs themselves, it should be considered for curtailed activity in the Pribilof kind crab EFH.** That would even mean no research trawling. Lets get this right and improve fisheries yields in the future.

Thank you.