

March 26, 2013

Jackie Dragon  
Senior Oceans Campaigner  
Greenpeace  
1661 Mission Street  
San Francisco, CA 94103

Chairman Eric Olson  
North Pacific Fishery Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, AK 99501

Via: email at [npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov).

RE: comments for Council meeting notebooks under D-2 Staff Tasking.

Dear Chairman Olson:

On behalf of Greenpeace, thank you for this opportunity to provide comments for inclusion in the April Council meeting notebooks under Agenda Item D-2 Staff Tasking regarding the Ecosystem Committee, the Council's Three-Meeting Outlook, and the important issue of the Bering Sea canyons. We regret that we will not be able to attend staff tasking during the April Council meeting to provide public testimony, and so we thank the Council for considering our comments as it reviews the Council's committees and discusses scheduling of its June 2013 meeting Agenda.

The Ecosystem Committee - Chair and appointments

Greenpeace would like to thank Chairman Olson and voice our support for the recent appointment of Council member Bill Tweit as Chair of the Ecosystem Committee, and thank former Chair Stephanie Madsen for her years of service and leadership. **In the future, when seats become vacant on the Ecosystem Committee we request advance notice and the opportunity to offer suggested names of individuals suitable for appointment for consideration during the Council's review of the NPFMC Committees and Workgroups.**

The Three-Meeting Outlook- scheduling and Agenda

As of the date of submission of these comments, the Council is scheduled to review the report from the Alaska Fisheries Science Center (AFSC) and a Council staff discussion paper on fishing activities and management of the Bering Sea canyons during the June 2013 meeting. **We request that this issue remain on the June meeting Agenda and that, during its scheduling discussions under staff tasking, the Council not move its review and discussion of the Bering Sea canyons to a later Council meeting.**

Our organization, as well as other stakeholders, are in the process of making costly arrangements to travel to and attend the June Council meeting in Juneau, Alaska specifically to provide public testimony on the AFSC report and staff discussion paper. Postponement of this important issue would seriously disrupt and hinder the efforts of our organization and other stakeholders to participate in the Council process at the June meeting. The Council has stated it believes that a good public, transparent, and responsive process is critically important to help ensure that the best, scientifically-based management decisions are made. While we do not expect that the AFSC report and staff discussion paper will be postponed, we

must take this opportunity to highlight with importance that the Bering Sea canyon issue remain on the June meeting Agenda.

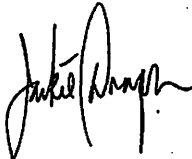
Ecosystem Committee - canyons review

**Further, we request that the Council's Ecosystem Committee meet and take up discussion of the AFSC report and staff discussion paper during the June Council meeting.** The Council has stated its intention to identify issues requiring immediate attention and refer them to the Ecosystem Committee, specifically marine canyons and conservation of deep-sea corals. The Bering Sea canyons and associated ecosystems of deep-sea corals and sponges are an appropriate issue to be referred to and discussed by the Ecosystem Committee at the June Council meeting.

On this point, we wish to thank the Council additionally for bringing Ms. Fan Tsao from the NOAA Coral Reef Conservation Program to the February Council meeting to update the Ecosystem Committee and the Council on the NOAA Strategic Plan for Deep-Sea Coral and Sponge Ecosystems, and the progress being made around the nation for their protection.

The Council has stated that it has an ethos of striving to be at the forefront of national discussions on best fishery management practices and is committed to using the best available scientific information to sustainably manage our nation's most productive fisheries. We hope to see the Council's continued leadership on this front with the implementation of gold-standard management measures to protect and conserve the deep-sea coral and sponge ecosystems of the Bering Sea canyons. Again, on behalf of Greenpeace's 1.6 million U.S. supporters, thank you for your consideration of our comments. We look forward to attending the June Council meeting and reviewing the AFSC report and staff discussion paper on the Bering Sea canyons.

Sincerely,



Jackie Dragon  
Senior Oceans Campaigner  
Greenpeace

CC:

Glenn Merrill, NMFS Alaska Region, Sustainable Fisheries Division

## **Adak Community Development Corporation**

PO Box 1943 Adak, Alaska 99546  
(907) 592-2335

March 26, 2013

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

Re: D-2 Staff Tasking - Crab FMP

Dear Chairman Olson,

The purpose of this letter is to request that the portion of Area O between 171 West and 179 West be removed from the BSAI King and Tanner Crab FMP, to allow the State of Alaska to take full management responsibility for Red King Crab management in that area.

The Council took a step in that direction under Crab Rationalization when the Council excluded the portion of Area O east of 179 West from the IFQ program for RKC.

Under Amendment 24 to the BSAI King and Tanner Crab FMP, the Council removed several state-managed stocks from the FMP.

**Option A: (Preferred)** Remove from the FMP the twelve state-managed stocks for which NMFS and the Council find that the State of Alaska has a legitimate interest in the conservation and management and for which there is either no directed fishery, a limited incidental or exploratory fishery, or the majority of catch occurs in State waters.

We believe that RKC east of 179 West meet the criteria under which state managed stocks were removed from the FMP under Amendment 24.

There has not been a directed fishery in the eastern portion of Area O for well over a decade, and even when there was a fishery in Area O in the 1990's the majority of the catch came from the area west of 179 West (Petrel Bank), which is managed under Crab Rationalization. The majority of the harvest that did occur east of 179 West occurred in state waters.

Currently the OFL for RKC is set for Area O as a whole, which complicates the ability of the State to manage an exploratory fishery in state waters in the Adak area.

Table E-4 of the FMP describes Aleutian Islands red king crab as: *"One or several distinct groups that are geographically separated by deep water trenches in passes between islands and from Bering Sea stocks by an area of sparse king crab abundance north of Unimak Pass."*

The May 2012 SAFE (pg. 6) section on stock structure in for Aleutian RKC states: *"However, given the expansiveness of the Adak Area and the canyons between some islands that are deep (>1,000 m) relative to the depth zone restrictions of red king crab (see above), at least some weak structuring within the Adak red king crab stock would be expected."*

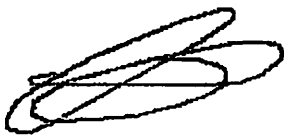
Amchitka Pass is a very deep pass at 179 West, that separates the rationalized Petrel Bank RKC fishery from the eastern portion of Area O.

There is no regular survey done in Area O to establish an area wide OFL. The last fishery on Petrel Bank was managed based on a test fishery specific to that area. We believe that there is evidence of some RKC rebuilding in the area around Adak, that could justify a small exploratory fishery, if carefully managed.

Last week the Board of Fish took action to limit vessel size to 60 feet and adopted a 10 pot limit for the portion of Area O east of 179 West, as a first step to managing small state water fishery on a local level. However, state management of a local fishery is hampered by an area wide OFL. This problem could be addressed by removing RKC in the eastern portion of Area O from the FMP.

Thank you for your consideration of our request.

Sincerely,



dave fraser  
ACDC



# Alaska House Bush Caucus

Representative Bryce Edgmon, Chair  
Alaska State Legislature  
Capitol Building, Room 410  
Juneau, AK 99801

March 15, 2013

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

RE: Gulf of Alaska Bycatch

Dear Chairman Olson and Members of the Council:

Alaska's Chinook salmon and halibut fisheries are of utmost importance to our state. They are cultural icons for Alaska Natives and non-Natives, a significant source of food in both subsistence and recreational fisheries, and a critical source of income for our commercial and charter fisheries.

The Bush Caucus is a bipartisan working group composed of 12 of the 40 members of the Alaska House of Representatives. The Bush Caucus represents rural and coastal Alaska. Our districts cover approximately 98% of Alaska's 6,649-mile coastline, from the Alexander Archipelago to the Arctic Ocean. We, along with many of our commercial, subsistence and recreational fisherman constituents, are very concerned about the effects of trawl bycatch on the increasingly poor Chinook runs and declining halibut stocks.

Federal fishery disasters have been declared for 2008-2012 for the Yukon River, 2011-2012 for the Kuskokwim River, and 2012 for Cook Inlet. As a result of the poor Chinook salmon returns, subsistence, commercial and sport fisheries have been severely restricted to protect our Chinook salmon stocks. However, these same Chinook salmon are caught as bycatch and discarded in both the Bering Sea pollock and Gulf of Alaska (GOA) groundfish fisheries.

Halibut stocks are also in decline throughout Alaska. Stock size is declining for unknown reasons and the number of fish is declining in many regions as well. Commercial and sport charter halibut fisheries have also been dramatically reduced in response to the declining resource: in some areas commercial catch limits have been reduced by over 60%. These same halibut are caught as bycatch in the GOA – under current regulations over 4 million pounds of halibut can be legally caught and discarded in all combined fisheries. The high GOA bycatch allowance in the pollock trawl fishery and lack of any cap in the non-pollock fishery are simply unacceptable.

As subsistence, commercial, and sport fishers reduce their catches of these critically important species, the Council must require the GOA trawl fisheries to reduce their bycatch of both

Chinook and halibut species. Specifically, we ask that you:

1. Reduce the Chinook salmon bycatch cap limit in the GOA pollock trawl fishery. The cap is currently set at 25,000 fish, which exceeds the ten-year bycatch average of the fishery.
2. Establish a hard cap of 5,000 Chinook or less for the GOA non-pollock trawl fishery, which currently operates without limits.
3. Implement additional reductions in halibut bycatch caps in the GOA via the GOA trawl bycatch management program which the Council is currently developing. Your action last year to further reduce the halibut bycatch cap by 15% is a good start and we support your efforts to focus on trawl halibut bycatch management in the Gulf. However, the health of the halibut stocks requires more immediate reductions to bycatch.
4. Increase observer coverage in the GOA trawl fisheries to 100% in order to gather accurate assessment of bycatch numbers. It is unacceptable that the current observer program only allows for 14-15% coverage in the fisheries that have the highest bycatch of Chinook and halibut.

We believe that setting lower limits in the pollock and non-pollock GOA fisheries for Chinook and halibut, providing more effective incentive programs, and increasing observer coverage to 100% would be the most responsible conservation actions that the Council can take in restoring and preserving our declining stocks. We appreciate the great responsibility of the Council to manage the future of our fisheries and we encourage expedient, comprehensive decisions that protect our Chinook, halibut, and the fishers who depend on them for food and livelihood.

Sincerely,

The Alaska House Bush Caucus

Representative Bryce Edgmon (Chair)  
Representative Alan Austerman  
Representative Eric Feige  
Representative Neal Foster  
Representative David Guttenberg  
Representative Bob Herron  
Representative Beth Kerttula  
Representative Jonathan Kreiss-Tomkins  
Representative Cathy Muñoz  
Representative Benjamin Nageak  
Representative Paul Seaton  
Representative Peggy Wilson

JH

Paul Keaton

Beth Kuttel

Byu Edgmon

Peggy Wilson

Daniel J. J. J.

Stewart King

2.2

Alan Austerman

Wood Jester

B. P. Nagel

Jim



**Kodiak Island Borough**  
710 Mill Bay Road, Rm. 101  
Kodiak, AK 99615  
907.486.9310



**City of Kodiak**  
710 Mill Bay Road, Rm. 220  
Kodiak, AK 99615  
907.486.8636

April 5, 2013

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

Dear Chairman Olson:

Re: Agenda Item D-2, Staff Tasking

The communities of Kodiak Island request that the North Pacific Fishery Management Council (NPFMC) develop a discussion paper on the issue of tendering of trawl-caught groundfish in the Western, Central, and West Yakutat areas of the Gulf of Alaska (GOA). As you may have heard, a high proportion of the trawl harvest of pollock and Pacific cod from Area 620 has been delivered to processors in Sand Point and Akutan this spring, whereas in past years almost all of this trawl harvest had been delivered to processing plants in Kodiak. This shift was facilitated by the use of tenders accepting deliveries from catcher vessels on the grounds, allowing the harvest and delivery to western processors to proceed at a very fast pace.

Initial estimates suggest that this change in fishing and tendering behavior has resulted in a loss of over 14 million pounds of pollock and cod to Kodiak plants, equivalent to about \$3.25 million in exvessel revenue alone. Of course, the impacts to Kodiak go further, affecting wholesale values, employment hours, and tax revenues.

This change in tendering behavior also complicates the trawl fishery's ability to effectively control the bycatch of Chinook salmon as well as the estimation of what the Chinook salmon bycatch actually is. Moreover, tendering poses a challenge for the random sampling of trawl fishery catches by the restructured observer program. And, at a time when the North Pacific Council is considering the establishment of catch shares for the trawl fishery, this accelerated tendering actually accentuates the race for fish.

We therefore request that the Council commission a discussion paper to evaluate the benefits and impacts of tendering trawl-caught groundfish in the Western and Central GOA, and West Yakutat. We also recommend that such a discussion paper be brought back for Council and public review at your June meeting in Juneau, so that it can be considered in concert with other GOA trawl issues on your June agenda. As always, we appreciate your consideration.

Sincerely,

Jerome Selby, Mayor  
Kodiak Island Borough

Pat Branson, Mayor  
City of Kodiak



D-2

D-2 STAR

# PUBLIC TESTIMONY SIGN-UP SHEET

Tasking

Sign Tasking

Agenda Item: ~~D-2 STAR~~ ~~Progress Report~~

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	<del>Mark Anderson</del>	<del>Star</del>
2	Clay Tillion	AEC
3	Roy Ashentel	Kaworak
4	John Tomewank	Elim
5	Art Nelson	BSFA
6	Sky Starkey	AVCP
7	Frank Kelly	UNFA
8	Kelly Wade, Simon	UNAlaska, AER, STR
9	JOHN GRUVER	UNITED CATCHER BOATS
10	Stephani Madson	At-sea Processors
11	HENRY MITCHELL	CVRF
12	Becca Robinson Gisclear	Yukon River Damage Fishery Assoc.
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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.

Frank Kelty  
D-2

April 7, 2013

North Pacific Fishery Management Council

The Unalaska Native Fishermen's Association (UNFA) is very concerned on the number of vessels participating in the under 60 feet fixed gear BSAI Pacific Cod fishery, in our opinion the number of vessels is sufficient. This sector has gone from a season that lasted all year long just 10 years ago, to one that has closed after 6 weeks this year. The time has come to shut the gate. We would like the North Pacific Fishery Management Council to look at all options that would limit the number of LLPs eligible to fish in this category.

Sincerely

  
Dustan Dickerson,

Unalaska Native Fishermen's Association Vice President