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Wilderness Adventure Tours

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January 26, 2016

Dan Hull, Chairman
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252
Fax: (907) 271-2817
npfmc.comments@noaa.gov

Re: Agenda Item C-2, Gulf of Alaska Bycatch Management

Dear Mr. Hull:

Thank you for the opportunity to comment on the February 2016 Gulf of Alaska (GOA) Total Bycatch Management discussion paper. I submit the following comments on behalf of The Boat Company (TBC). TBC is a tax exempt, charitable, education foundation with a long history of operating in southeast Alaska. TBC conducts multi-day conservation and wilderness tours in southeast Alaska aboard its two larger vessels, the 145' M/V Liseron and the 157' M/V Mist Cove. TBC's clients fish for halibut and Chinook salmon populations affected by trawl bycatch in the Gulf of Alaska (GOA). Additionally, TBC's charitable programs support southeast Alaska communities that depend on access to Chinook salmon and halibut for commercial and guided sport fishing, unguided sport fishing and subsistence.

As noted in the October 2015 discussion paper on GOA trawl bycatch management, NMFS and the Council will prepare a Draft Environmental Impact Statement (DEIS) that analyzes a selected range of alternatives. This February 2016 discussion paper is an initial step toward the development of that DEIS, and seeks to develop a preliminary discussion about the relevant merits of Alternative 2, which would allocate target species, and Alternative 3, which would establish PSC quotas managed primarily by cooperatives. The following comments thus emphasize the importance of developing and maintaining a broad range of alternatives for analysis in the DEIS.

In particular, TBC urges the Council to move Alternative 3 forward for analysis in the DEIS. The discussion paper explains that Alternatives 2 and 3 each address the Magnuson-Stevens Act's (MSA's) National Standards in different ways, particularly under National Standards 1 and 4, because Alternative 2 contemplates a catch share system for target species and Alternative 3 exclusively allocates PSC species. [See p. 10-11]. Alternative 3 is significantly distinguishable from Alternative 2 in that it provides a much simpler way to combine PSC limit reductions with one of the primary management tools – cooperative bycatch management – that may assist the industry as it works toward reducing bycatch. Alternative 3 is thus essential to ensuring the development of a range of alternatives in the DEIS that meets the requirements of the National Environmental Policy Act (NEPA). [42 U.S.C. §§ 4321 *et seq.*]. NEPA requires that environmental analyses “[r]igorously explore and objectively evaluate all reasonable alternatives.” [40 C.F.R. § 1502.14(a)]. A “reasonable” range of alternatives includes alternatives “that are practical or feasible” and “may partially or completely meet the proposal’s goal.” [Council on Environmental Quality (CEQ), *Forty Most Asked Questions*, Questions 2A and 2B; 40 C.F.R. §§ 1502.14, 1506.2(d); *City of New York v. U.S. Dep’t of Transp.*, 715 F.2d 732, 742-742 (2nd Cir. 1981)].

The range of alternatives should be sufficient to “sharply defin[e] the issues and provid[e] a clear basis for choice among options by the decision maker and the public.” [40 C.F.R. §§ 1502.14]. The key criterion for determining whether a range of alternatives is reasonable “is whether an EIS’s selection and discussion of alternatives fosters informed decisionmaking and informed public participation.” [*Westlands Water Dist. v. U.S. Dep’t of Interior*, 376 F.3d 853, 872 (9th Cir. 2004)(citations omitted)]. The exploration of alternatives is critical, because “[w]ithout substantive, comparative environmental impact information regarding other possible courses of action, the ability of an EIS to inform agency deliberation and facilitate public involvement would be greatly degraded.” [*New Mexico ex rel. Richardson*, 565 F.3d 683, 708 (10th Cir. 2009)(citations omitted)].

It is thus clear that under NEPA, the range of alternatives should present multiple, different ways of meeting the Council’s purpose and need for the program, even if each individual alternative does not fully achieve all of the objectives. Prior to the Council’s October 2015 motion, which added Alternative 3, there were only two alternatives under consideration, and the second alternative (now Alternative 4) was an option to incorporate either a Community

Fisheries Association (CFA) or an Adaptive Management Program (AMP) as potential add-on to Alternative 2. [See p. 49].

TBC recognizes that one of the most critical issues with regard to the Council's socio-economic goals and objectives pertains to the relationship between harvester and processor efficiency under a target species catch share program and the potential adverse impacts of catch share program on communities, crew, and entry level fishery participants. As noted in the discussion paper, "the most obvious difference" between the two alternatives is the presence or absence of groundfish species allocations. [See p. 28]. The NEPA process provides the opportunity to analyze these socio-economic issues through the comparison of two alternatives in a DEIS.

Another important difference between Alternatives 2 and 3 is that Alternative 3 provides a simpler path to bycatch reduction. Alternative 2 includes fourteen elements, including multiple elements that may entail complex and controversial decisions about qualifying criteria and different baselines for those criteria, use caps, consolidation limits, regionalization measures, sideboards, processor control of shares, and transferability limitations, in addition to a new cost recovery program to address management costs. In contrast, Alternative 3 does not require multiple elements aimed at ameliorating the adverse impacts associated with catch share programs. Instead, it includes just seven elements and aims primarily at improved performance in PSC limited fisheries. [See p. 10]. Measures aimed at limiting consolidation are not necessary because it does not allocate target species. The most difficult and controversial decision under Alternative 3 is also an element under Alternative 2 - the final chosen level of Chinook and halibut PSC limit reductions. Thus Alternative 3 represents a distinct choice that will "sharply defin[e] the issues" – particularly in terms of ease and speed of implementation and other challenges associated with catch share programs - and is essential to the development of the suite of alternatives carried forward for analysis in the DEIS.

Additionally, TBC encourages the Council to continue to consider modifying or adding options or alternatives that maximize conservation benefits through higher levels of PSC limit reductions in Alternatives 2 and 3, or other PSC avoidance incentives through the Alternative 4 programs. The development of an alternative (or modification of existing alternatives) that would minimize environmental harm to a significant degree more than any of the others is a

critical and required part of the NEPA decisionmaking process. [40 C.F.R. § 1505.2]. Notably, the programmatic alternative in the 2004 Groundfish PSEIS that NMFS identified as the environmentally preferable alternative included consideration of overall PSC limit reductions of up to 50%. As explained in the PSEIS:

The environmentally [preferable alternative] will promote the national environmental policy as expressed in Section 101 of NEPA. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; and is the alternative which best protects, preserves, and enhances historic, cultural, and natural resources. [NMFS. 2004].¹

TBC also believes that the range of alternatives for the GOA bycatch management program should provide for distinct choices in terms of how and how much the program will reduce PSC. The one clear similarity between Alternatives 2 and 3 is that both provide for a range of 0 – 25% PSC limit reductions for halibut and Chinook salmon relative to the status quo. TBC's August 2015 scoping comments to NMFS requested that the DEIS provide a broader range of PSC limit reductions. While TBC appreciates the Council's efforts to develop a range of PSC limit reductions of up to 25% relative to the status quo, those alternatives still do not fully address changes in access to the halibut resource that have increased the share to PSC users at the expense of the directed fisheries. TBC has also long maintained that the existing Chinook PSC limit in the GOA pollock fisheries in particular was set way too high. The Council could set limits well below options under consideration (18,750 fish) without constraining the pollock fisheries in light of the reported take of between 10,600 and 13,500 Chinook from 2012 - 2015. TBC encourages the Council to continue to consider analyzing additional ways through the NEPA process to protect and preserve unique cultural and fishery resources such Chinook salmon and halibut beyond the PSC limit reduction options presented in Alternatives 2 and 3.

Another option, as TBC explained in its October 2015 comment letter, is that modifications to the Alternative 4 programs can enhance the achievement of bycatch reduction goals. For example, the Council could utilize the CFA or AMP to complement existing and future economic and environmental incentives for gear conversion in the Pacific cod fisheries or set aside PSC as a precautionary measure, with possible allocation options after considering the

¹ NEPA sets forth the relevant policy purposes as follows: (1) fulfill the responsibilities of each generation as *trustee of the environment for succeeding generations*; (2) assure for all Americans safe, healthful, productive and esthetically and culturally pleasing surroundings; (3) attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences; (4) *preserve important historic, cultural, and natural aspects of our national heritage*, and maintain, wherever possible, an environment which supports diversity and variety of individual choice; (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources. [42 U.S.C. § 4331(b)(emphases added)].

conservation status of the species and impacts on directed fisheries.² A gear conversion option could meet multiple Council goals and objectives for the program by providing additional entry-level opportunities and opportunities to explore and take advantage of market trends and consumer preferences for higher value species taken with fixed gear, while at the same minimizing bycatch mortality without reducing overall harvests.

Finally, the October 2015 discussion paper considered the potential for reserving a PSC set aside as part of the Alternative 4 program elements. A conservation reserve would provide the flexibility to ensure additional salmon and halibut savings as needed to respond to changes in the conservation status of each species. Such a buffer for halibut and Chinook salmon is a reasonable precautionary measure that could address the possibility that PSC species may not recover quickly enough to restore the balance between directed fisheries and PSC users, or even decline further. Allocations of PSC quota from the reserve could occur in years of higher abundance and strengthen the bycatch reduction performance of the fishery by providing additional incentives to reduce bycatch, limit habitat impacts and encourage innovation and gear modification or conversion.

In sum, TBC appreciates the Council's decision to introduce an additional alternative in its October 2015 motion, and submits that the alternative should move forward for analysis in the DEIS as part of the NEPA process, particularly in light of NEPA's requirement to consider a reasonable range of alternatives. Additionally, the analysis will ultimately need to identify an environmentally preferable alternative, and TBC encourages the Council to continue to consider modifying or developing alternatives that provide for distinctly higher levels of protection for Chinook salmon and halibut.

Sincerely,

Paul Olson

² As TBC explained in its October 2015 comment letter, the PFMC's catch share program included a detailed analysis of gear conversion options as part of its adaptive management program in order to address changing market conditions, public relations issues, and increase the ability of the fisheries to remain within bycatch limits. See NMFS. 2010. Rationalization of the Pacific Coast Groundfish Limited Entry Trawl Fishery; Final Environmental Impact Statement, Including Regulatory Impact Review and Initial Regulatory Flexibility Analysis at 296-296, 359, 381. Pacific Fishery Management Council, Portland, OR. June 2010 (identifying an interest in gear conversion by some fishermen and a trend toward higher prices for non-trawl caught groundfish due to public scrutiny of bottom trawl gear). Also, the NPFMC's economic analysis of halibut PSC in the BSAI groundfish fisheries showed that overall, fixed gear hook and line fisheries generate twice as much economic value as trawl fisheries relative to their take of halibut PSC, and the "very low" bycatch rate in the pot cod fisheries is "generally at least an order of magnitude lower than any of the other sectors," so that it generates "extremely high" economic value per unit of halibut PSC relative to other gear types. See Northern Economics. 2014. A quantitative examination of halibut mortality in BSAI Groundfish fisheries at 25-26, 29, Table 15.

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01/26/2016

Honorable Council Members,

Re: Gulf of Alaska Trawl Bycatch Management Plan:

As you consider the Gulf of Alaska Trawl Bycatch Management Plan, we want to be sure you understand that Seward contributes to the economic viability of groundfish harvesters, processors and support industries. Geography and good fortune situate Seward as a deep water ice-free port, on the road system, with rail and air access to major markets that capitalize on that location and bring added value to landed product. Seward is consistently in the top twenty landing by volume ports in the US, with demonstrated capacity and logistic support to efficiently move large volumes of product. Processor capacity is increasing.

A vibrant and growing vessel support and repair industry, along with over \$20 million in harbor improvements designed to support Gulf trawl-sized vessels, offers catcher, processor and tendering operators a cost and time effective maintenance value equation that delivers on budget, time and quality.

We appreciate the challenges you face and the goals and objectives established to guide the process, in particular the charge to “Promote community stability and minimize adverse economic impacts by limiting consolidation, providing employment and entry opportunities, and increasing the economic viability of the groundfish harvesters, processors, and support industries.”

Just as no community should expect a fixed percentage of a resource dynamic in volume and range within the region, no community within the region should expect to become ineligible. Besides impacts to the communities involved, imposing landing requirements in order to meet set-asides can drive costs up and become an artificial economic influence.

Thank you for your consideration,

Jim Hunt

January 24 2016

Agenda Item C2, Gulf Trawl Bycatch Management

Chairman Dan Hull and Council
North Pacific Management Council
605 4th Ave. Suite 306
Anchorage, AK

Dear Chairman Hull and Council Members,

My name is Jody Cook. I am an owner/operator of a 58' trawler that is home ported in Petersburg, Alaska. I do most of my trawling out of Sand Point in the Western Gulf.

I am writing in regards to the "Trawl Bycatch Management" alternatives, currently before the council. As I have mentioned before,. I feel that the current Alternative 3 was added in a way that circumvented the proper council process. And now the council and all stake holders are having to invent a new process for analyzing and including the Alternative. It is unfortunate that one person's agenda can upset the whole process, in such a way. I understand the State wanting to protect Alaskan's and their resource. But,.. I believe that the new Alternative will bring as much hardship and disadvantage to Alaskan stakeholders, along with any other Trawl fishermen. And, on top of this,.. it provides absolutely zero incentive for saving or protecting by catch, over the other alternatives. A co-op may provide a pool of psc that can be shared, but it gives limited incentive for working together. The bottom line will always come back to the "race for fish". If I am racing for fish, the incentive would be more toward hoping that others were in the penalty box because of by catch hits. You may imagine that fishers would work together to share ways for the co-op to save psc. Like sharing hot spot areas and how their excluders may be working or not. I can assure you,.. while there is an open pool of target species,.. the main focus for every fisher, will be how to increase their share. This has always included secret radio frequencies, deceptions of where and when catch was made. Deceptions on what kind of gear may or may not be the best. In short,... a combination of increasing your own chances, and decreasing your competitors chances.

So, in Alternative 3, any kind of co-op, will only be a "co-op" in word and management. While there is a "race for fish", there will be no fleet co-operation that reduces by catch, beyond what happens now. In fact , there may be increased incentive to see others being penalized and having to stand down for by catch. Also, if the season is close to over, then guys with a decent season may not care about high by catch rates. They would fish out their own share and keep fishing until they got penalized and then call it a season and gear up for the next.... Just a couple of examples, but I think there are plenty more, not even thought of. My point is, that as long as there is still a race for fish, you have no significant incentive to work together to reduce by catch. It seems so simple and I just don't understand why this Alternative was ever given any life. The other alternatives were fully analyzed and survived a long due process of council scrutiny. If this is a new manner of council action, I hope that, as a fisherman, I will also be allowed to come in at the latter part of council action and introduce a completely new concept

into the process. I hope that the council sees Alternative 3 as the “monkey wrench” that I believe it was intended to be, and removes it from the Alternatives being considered.

I believe that Alternative 2 is the best option to deal with “Trawl Bycatch Management”. The main advantage is that it ends “the race for fish”. This brings in a host of other benefits, along with the incentive for fishermen to work together to reduce and manage by catch and psc. 1. It increases safety by taking the urgency out of fishing. You are not racing for your share, so you don't fish in some of the rougher weather. 2. The fishermen have incentive to share all information concerning hotspots and excluder efficiency, and any other psc saving factors, like fishing in day vs night, etc... As long as there is no race for fish, there is no incentive to deceive or manipulate the competition. There is no competition. 3. Generally, in catch share programs, there is always a positive affect on fish quality. Cod and pollock are often coming to the processors in high volumes, with fish sitting in tenders, fish boats, holding tanks, and iced totes, for days. With no race for fish, the boats can get on a delivery schedule that keeps fish fresher going into the freezer. These are just 3 obvious benefits. There are many others that ending the race for fish brings. It would give fishers the ability to start at dates that have the least amount of by catch and psc around. The cod build up and school during spawning season and other species seem to be driven away from these areas, at that time.

Of the 14 goals and objectives, I believe that Alternative 2 has, by far, the most potential to fulfill the most. And any questionable areas could be satisfied with additions or adjustments to existing options, or adding or subtracting options.

The only goal and objective that it has been argued Alt. 2 may not meet, is #6. It covers community stability, limiting consolidation, and new entry opportunity.

Alt. 2 currently includes regionalized landing, to protect communities. Alt. 2 currently includes owner, vessel, and processor use caps. Alt. 2 currently includes a cost recovery and loan program to offer up to 25% of proceeds to support a loan program for new entrants.

In previous proposals from Peninsula Fishermen's Coalition, (a Western Gulf Trawlers group), there were skipper shares that were included. This could give hired skippers extra value and stability in the fishery. A natural process is often that a hired skipper will be offered a share of a vessel. This would enhance or at least keep the hired Skippers on a level playing field with the process.

I would like to speak to the observer issue, briefly. I believe that there should be the partial coverage to see if there is a smoking gun and to see if the trawlers are way out of line with by catch and psc. I ask that the Gulf trawl fleet be seriously considered for electronic monitoring. If there is no extreme revelation through the first 5 years of the observer program, then I would propose a continued partial coverage with a fishers psc extrapolated, and applied in a pool through a co-op structure. I feel that the prohibitive costs of the observer program out weigh the benefits. In the Gulf, and especially in Western Gulf, we are not multi million dollar Corporations that can handle the expenses of a 100% observer program that the Bering Sea Co-ops and corporations can handle.

I am also apposed to Alternative 4. Any CFA options that address community stability, can be better applied in some fashion through Alternative 2. And this, without the added expense of

managing the association and taking quota away from the traditional fishers, who have invested and developed the fishery.

Another issue that I feel deserves being considered is a reduction of a number of the Sea Lion restricted fishing zones. In light of recent findings, I believe that reducing many of the larger restricted rings to the 3 mile ring, would pose no threat to Sea Lions. These include traditional trawl areas that used to be fished in spawning season. I can guarantee that if these areas were open, that the by catch and psc would be near zero, when fished at the right time.

I ask for the council to recognize the merit in Alternative 2, in regards to the goals and objectives of the motion. First and foremost,. the benefits of **ending the race for fish**.

Sincerely,

Jody Cook
F/V Cape Reliant

January 12, 2016

Agenda Item C-2 GOA Trawl Bycatch Management

Chairman Dan Hull
North Pacific Management Council
605 4th Ave. Suite 306
Anchorage Alaska 99501-2252

Dear Chairman Hull,

I own and operate a 58' combination trawler/seiner based out of Sand Point, Alaska. As I have stated previously, I support Alternative 2 of the GOA trawl by-catch management plan. If Alternative 2 fails to move forward I support status quo. I adamantly oppose Alternative 3.

The first problem I have is the title "Alternative 3". It should be renamed, "Put trawlers that depend on GOA ground fish out of business plan", because that is exactly what Alternative 3 would ultimately do. Whoever authored this plan does not have a fundamental understanding of commercial fishing as a business, or human nature for that matter. The following are my comments by section:

1) **100% Observer Coverage and Monitoring.** This has worried me most of any of these plans. Using the figure of \$550 a day, which some argue is conservative, we would have had over \$75,000 in observer costs in 2015. I was willing to swallow increased observer costs with Alternative 2, because we would have some stability and there would be more flexibility on how we conduct the fishery. One of the advantages of a rationalized fishery is that you can wring more pennies out of a pound of fish. Alternative 3 would give us zero advantages, plus add these observer costs. Small vessels in the Western GOA just do not gross enough income from ground fish to be able to justify these costs.

3) **Sector allocation of PSC.** You might as well go ahead and reduce the by-catch caps, one of the options in this section. This will just accelerate the inevitable of putting some or all of us out of business. Under Alternative 3 there will be no financial gain where an owner can invest in gear or technology that may further reduce by-catch. We will not, cannot risk losing target species by experimenting with new excluders or different types of gear if continuing to race for fish.

4) **Voluntary inshore cooperative structure.** What's the point of forming a co-op? It is my understanding that forming a co-op allows the members to organize the harvest and the processing of the fish to maximize the value of the fishery. For example, I envision that my processor would not want the fleet all fishing at the same time in order to smooth out production, resulting in more value and a better product. This may require that boats fishing early or late may need more by-catch than boats fishing at a different time of the season or year. Alternative 3 requires that we race for fish and it is also extremely restrictive on the transfer of by-catch. I see no need for the further expense of a co-op manager. I can't imagine how to come up with an "annual fishing plan". I will do exactly what I am

doing now and start at the beginning of the season and try to catch more than the other boats, and hope and pray that there is not too much by-catch. In this section under b) options 1, the words "equal shares" repulsed me more than anything else in this plan. Is this just social engineering? "Equal share" does not represent my time in the fishery. "Equal share" does not represent the investments that I have made, and "equal share" does not reflect the work that myself and my crew have done, often in adverse conditions. Myself and my crew would be much better off with status quo, or better yet, Alternative 2.

Whoever typed "**Goals and Objectives**" must not have read the previous 5 pages. I don't understand how any of these objectives would be met, because we are still racing for fish. Safety? This plan would actually make the fishery more dangerous. If the meter is running on an observer I am going to be more inclined to fish when I shouldn't just to continue to cover observer costs.

This is really very discouraging. I could go on at length what is wrong with Alternative 3. Why do we need to reinvent the wheel? We now have plenty of examples where if a fishery is rationalized it stabilizes it economically. Washington and Oregon have proven that you can reduce by-catch and rebuild depleted stocks. To my knowledge there is no place in the world where only the by-catch has been rationalized. So why attempt a grand experiment in the GOA? If Alternative 3 were implemented, and it failed, which I am convinced it would, then how much money would that cost industry, the communities and the state? Is this a gamble the state can afford to make in these times of serious financial distress?

Three times now since 2000, we have been to the water's edge trying to rationalize the Gulf. We are now surrounded by rationalized fisheries, any of which I would accept in a heartbeat. I truly understand the desire (need?) to control by-catch in the GOA, but at the end of the day the fishing boats themselves actually have to show a profit. If that cannot be accomplished there is no need to worry about crew jobs, which seemed to be the main concern the last time we were close to rationalization, or no need to worry about the communities, where all the focus is now. Alternative 3 has done one thing that I have never witnessed since becoming involved with the council process, and that is we are all united in opposition to it. I have not talked to one person that finds anything positive in this plan.

I ask the council, please, let's not waste any more of every one's time. Flush alternative 3, move on alternative 2, or table it all and we continue status quo until sometime in the future there is a more business friendly environment.

Sincerely,

Tom Evich
F/V Karen Evich



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

GOT Trawl By catch Management

1 message

paul frizzell <frizzellpaf@yahoo.com>

Tue, Jan 26, 2016 at 11:51 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Hello my name is Paul Frizzell, I have been a trawl fisherman out of Kodiak, AK on the F/V Collier Brothers for over 10 years. Proposal 3 would be the worst thing to have, fisherman vs fisherman instead of working together and could cause fisheries to close from by catch being caught individual ending their year. Proposal 2 would be for the best everyone working together and make the best for now in the time of change.

Thank You For Your Time
Respectively Paul Frizzell

[Sent from Yahoo Mail on Android](#)

January 26, 2016

Agenda Item C-2 GOA Trawl Bycatch Management

Chairman Dan Hull

North Pacific Management Council

605 4th Avenue. Suite 306

Anchorage, AK 99501-2252

Dear Chairman Hull,

Hello, my name is Ron Naughton, I operate the F/V Cape Kiwanda, a shoreside trawler based in Kodiak, AK. I was born and raised in Kodiak, been a fisherman since I was 16 years old and a trawler for the past 26 years. I rely on the Gulf fisheries to provide for my family and would like to see the fisheries and my community remain healthy for many years to come.

With the reduced bycatch caps that have recently been put in place, the GOA trawl fleet needs the tools to better control PSC in order to stay in business. I believe Alternative 2 is a far better choice than Alternative 3 to achieve this. Also, if not Alternative 2, the status quo would also be preferable to Alternative 3.

Alternative 2 is more like other rationalization plans that are already in place and have been proven to reduce bycatch, increase safety and operational efficiencies, primarily by removing the race for fish. Removing the race for fish is the cornerstone of these programs and I believe without this element Alternative 3 will not work.

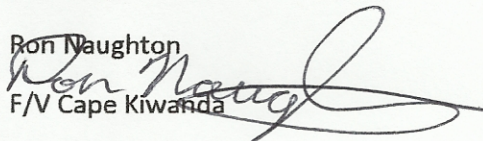
Alternative 3 is a radical departure from programs that have a proven record of reducing PSC and I for one do not want my fishery to be the test subject for such a program.

A great deal of work has already been done in designing Alternative 2 with input from the many facets of the trawl industry, the general public and community stakeholders. In contrast Alternative 3 does not seem well thought out and does not seem to me to meet many of the Councils stated objectives such as #'s 2,4,7,8, & 9.

Please continue to work on adopting Alternative 2 and forget about Alternative 3 altogether.

Sincerely,

Ron Naughton
F/V Cape Kiwanda



January 23, 2016

Agenda item C-2 GOA Trawl Bycatch Management.

Chairman Dan Hull

North Pacific Fishery Management Council.

605 4th Ave Suite 306.

Anchorage Alaska 99501-2252

Dear Chairman Hull,

My name is Bill Connor from Petersburg, Alaska. I am an owner in the F/V Cape Reliant a shore side trawler out of Petersburg Alaska. **I live in Petersburg, Alaska a coastal fishing village that is getting no recognition in this plan.** I have been involved in trawling out of Sandpoint, Kodiak and Seward since 1992. I depend on the Gulf of Alaska Fisheries for my livelihood and the livelihood of my crew of 4. I want our fisheries and our communities, **(Petersburg also)** to remain healthy for many generations. We need to have the tools to deal with all the bycatch measures that have been put in place on us over the years. We have been promised the tools yet here we are still waiting. I believe there are way too many new chefs in the kitchen with a line just outside waiting for their soup.

I only support alternative 2 of the GOA trawl bycatch plan. If Alternative 2 fails to move forward as the Councils preferred alternative, I would support status quo.

Alternative 3 is a non-option, in my eyes it does not remove the race for fish and I do not see how it creates efficiency or safety or cooperation within the fleet.

With 100% observer coverage the race needs to end so we can constrain the days at sea fishing in order to mitigate the very high cost of trawling. Which in turn will allow us to lower bycatch through communication amongst the fleet and picking weather windows that allow safer fishing trips because the race has ended.

Alternative 3 has so many hands reaching out for a piece of this pie it will cause consolidation and lost crew jobs. From CFAs to coop managers, to 100% observer coverage, I am Obamad out.

Toss alternative 3.

Move forward on alternative 2, it will stop the race for fish, provide stability; provide bycatch management tools, and that will bring more safety to or crew and ourselves.

Thank you for your time,

Sincerely,

Bill Connor, F/V Cape Reliant

January 26, 2016

Agenda Item C-2 GOA Trawl Bycatch Management

Chairman Dan Hull

North Pacific Fishery Management Council

605 4th ave. Suite 306

Anchorage Alaska 99501-2252

Dear Chairman Hull,

My name is Stefan Iankov, my family and I own and operate the F/V Michelle Renee, a shore side trawler out of Kodiak Alaska. I live and own a home here in Kodiak, my family has been involved in the Kodiak trawl fisheries for the past 31 years. I depend on the Gulf of Alaska Fisheries for my livelihood and I want our fisheries and our community to grow stronger and remain healthy for many generations. Alternative 2 will guarantee all of the above. We need the tools that have been promised to us for a long time now to deal with all the bycatch measures that have been put in place over the last few years!

Since I've been involved in harvesting ground fish out of the Gulf of Alaska I have not understood the reason for reductions in the Halibut PSC cap and the most recent Chinook PSC cap when I see no shortage of Halibut and Chinook, unless the reason is to shut us down for good, because that is what will happen if we don't move forward with alternative 2 !

I strongly oppose Alternative 3 because it will be the end of every GOA dependent vessel. We will be racing for fish! There are catch share programs in place that are successful in the North Pacific "AFA, AM 80, Rockfish Program" and in Washington, Oregon and California, Catch shares with allocated target species. They work! And they will continue to work as long as we keep from reducing the tools that make it possible to harvest fish out of our very thriving oceans.

Alternative 2 has been a work in progress since 2012; a lot of effort has been spent designing Alternative 2. PLEASE let's move forward with alternative 2, and drop alternative 3 and 4 no reason to put GOA dependent vessel out of business!

Sincerely,

Stefan Iankov



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

Agenda Item C-2 GOA Trawl Bycatch Management

2 messages

Ocean Hope 3 <isioh3@gmn-usa.com>

Mon, Jan 25, 2016 at 12:15 PM

To: simonburn7@gmail.com, "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Chairman Hull.

My name is Simon Burn, I am the primary Captain of the Ocean Hope 3, A trawler based out of Kodiak for the past several decades...I personally have been involved in Kodiak's trawl fisheries for the past 26 years. I live in Oregon, but spend most of my years living on the boat in Alaska, pursuing my livelihood. It is to my core that I want and need, passionately, for our Alaska Communities to remain healthy and sustainable for many generations to come. It is imperative for us to have adequate bycatch measures in place in order to maintain this objective.

Vessel level PSC use accountability is not possible with basket sampling. Someone needs to get a hit (salmon or halibut) in the sample to make up for all the zeros- only Pollock trips with salmon census would allow for vessel level PSC use. Without census, accountability needs to be coop level (several vessels accountable for their combined PSC use) - this will likely encourage large coops, excluding small coops around small processors.

I support Alternative 2 of the GOA trawl Bycatch management plan. If that one fails to move forward, I support Status Quo. I am adamant in my opposition to Alternative 3, as it doesn't remove the derby style race for fish. It has been my experience, since being involved in Kodiak's fisheries as a whole for over 30 years, (I longlined as a lad there), and now more recently as a Captain, that this "RACE PACE" is a sure way to stack Bycatch and decrease safety while doing it. Alternative 3 is a dangerous proposition, in my opinion.

There are numerous examples of successful trawl catch share programs in the North Pacific. I have been involved in the longline halibut, hake, pollock, crab and rockfish programs personally. These programs work well when properly designed. There is no precedent for PSC only. It is imperative to our businesses, our jobs, livelihoods and those of our communities, to not have to be put to such risk just to see if it's going to work. Please consider the consequences to us all if it doesn't.

There may need to be some adjustments to Alternative 2 over time. But it is a design that we can live with. Alternative 3 is a disaster in the making. Alternative 2 has been a work in progress since 2012, there has been a lot of effort put forth into it. Please move forward with Alternative 2, and drop Alternative 3.

thank you for your consideration,

Sincerely,

Captain,

January 26, 2016

Re: C-2 GOA Trawl Bycatch Management

Chairman Dan Hull

North Pacific Fishery Management Council

Chairman Hull,

I am Mark Chandler, an owner of the F/V Topaz, a family owned vessel that has been fishing in the GOA for 35 years. We have been participating in the groundfish fishery since its inception. I would like to provide my support for Alternative 2 of the management plan being developed for GOA bycatch management.

This Alternative has been crafted over a number of years with a great deal of support by the fleet and the processing community. It is largely modeled after the very successful Rockfish Program and satisfies the objectives of the purpose and needs statement very well. Alternative 3 does not adequately address the race for fish, so is bound to fall short in bycatch reduction. It is also implicitly unfair to those vessels, crews, and families that have been highly dependent on GOA groundfish. Alternative 4 has far too many unknowns associated with it, and would delay a much needed resolution to the long standing problem of responsible management of bycatch in the GOA groundfish fishery.

Please support moving Alternative 2 forward as the preferred alternative. The fishing fleet, the processing industry and the community of Kodiak are dependent on a successful, timely, and fair management plan.

Mark Chandler

240 Rhododendron Dr.

Florence, OR 97439

Groundfish Forum

4241 21st Avenue West, Suite 302
Seattle, WA 98199
206-213-5270 Fax 206-213-5272
www.groundfishforum.org

January 26, 2016

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

Re: Agenda Item C2, GOA Trawl Bycatch Management

Dear Chairman Hull,

Groundfish Forum represents 18 trawl catcher-processors operating in the Amendment 80 sector in federal waters off Alaska. Many of our vessels have a long history of operations in the Gulf of Alaska and are significantly dependent on these fisheries. We are writing to comment on the suite of alternatives contained in the current discussion paper on GOA trawl bycatch management.

As the Council is beginning to review and refine the alternatives under consideration, we would like to offer the following recommendations:

Observer coverage

While both Alternatives 2 and 3 mandate 100% observer coverage for all vessels, the analysis indicates that NMFS would like to have 200% coverage on CPs with one Lead Level II observer. We suggest the analysis review the availability of Lead Level II observers in light of the difficulties that some sectors have experienced obtaining them. It may be more appropriate to simply mandate 200% coverage.

Sector definitions

We recommend the sector definitions contained in Alternative 2, section 2, be incorporated in Alternative 3, section 2 for consistency and clarity:

***Inshore sector:** Shoreside processors with an eligible FPP and harvesters with an eligible FPP and LLP endorsed for GOA trawl. Allocations are based on trawl landings during the qualifying years with a CV trawl LLP or a CP trawl LLP that did not process catch on board.*

***Offshore sector:** Am 80 vessels defined in Table 31 CFR Part 679 and their replacement vessels, and their current GOA trawl LLP. Allocations are based on trawl landings during the qualifying years with a CP trawl LLP that processed catch on board.*

Assigning CP history to the LLP (Alternative 2, section 7, part a)

As per the industry letter submitted to the Council in October 2014, we request that CP history allocation to the LLP options include ‘drop year’ provisions as follows:

Option 1. 2008-2012

Suboption 1. Drop 1 year

Option 2. 2007-2012

Suboption 1. Drop 1 year

Suboption 2. Drop 2 years

Option 3. 2003-20012

Suboption 1. Drop 1 year

Suboption 2. Drop 2 years

Suboption 3. Drop 3 years.

Chinook salmon PSC:

Under the Council’s recent action on Chinook salmon limits for the non-pollock fisheries (Amendment 97 to the GOA FMP), the limits for each sector are specified in a table at CFR 679.21(d)(3)(i) as shown:

For the following sectors defined at § 679.21(i)(2)...	The total Chinook salmon PSC limit in each calendar year is...	Unless, the use of the Chinook salmon PSC limit for that sector in a calendar year does not exceed...	If so, in the following calendar year, the Chinook salmon PSC limit for that sector will be...
(A) Trawl catcher/processor sector	3,600	3,120	4,080
(B) Rockfish Program catcher vessel sector	1,200	N/A	
(C) Non-Rockfish Program catcher vessel sector	2,700	2,340	3,060

Both Alternatives 2 and 3 should reference this table explicitly.

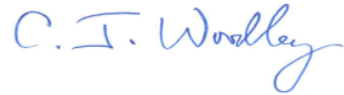
Use of PSC apportionments (Alternative 2, Section 7, part b)

We note that under Amendment 97 (Chinook salmon PSC limits for non-pollock fisheries) there is a seasonal limit for the CP sector prior to June 1st [CFR 679.21(d)(3)(ii)(A)]. This limit should be maintained to preserve access to the summer rockfish fishery. Further, CP PSC allocations should not have area designations (WGOA or CGOA). The last sentence of part b should read:

Once in the cooperative, PSC can be used to support the target fisheries within the cooperative at any time in any area, except that the seasonal limit prior to June 1st defined in Amendment 97 will be maintained.

Thank you for the opportunity to comment. We look forward to working with you and other stakeholders to develop a fair and meaningful program for the Gulf of Alaska trawl fisheries.

Sincerely,

A handwritten signature in blue ink that reads "C. J. Woodley". The signature is written in a cursive style with a large, looping "y" at the end.

Chris Woodley
Executive Director



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

Agenda item C-2 GOA

1 message

mike helligso <mikehelligso@gmail.com>

Tue, Jan 26, 2016 at 1:48 PM

To: npfmc.comments@noaa.gov

Dear Chairman Hull,

My name is Mike Helligso. I operate the f/v Collier Brothers and own a portion of the f/v Laura. I was born in Kodiak 35 years ago, have lived here my whole life and am starting a new family here. I have been working in the kodiak trawl fishery full time since 1997. My family and I heavily depend on the central gulf trawl fishery. Alternative 3 WILL ruin the trawl fishery and devastate the Kodiak community. I honestly don't understand how anything in that alternative will have a positive on the Kodiak community. I support a lot of the aspects in alternative 2 and status quo. I love living in Kodiak and being able to raise a family here. If alternative 3 is adopted I really fear that won't continue.

Sincerely Michael Helligso



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

GOA trawl bycatch management

1 message

Beaux Howard <beauxregardhoward@hotmail.com>

Tue, Jan 26, 2016 at 11:52 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Chairman Hull,

My name is Beaux Howard. I'm 29 years old. My family owns and operates the F/V Collier Brothers. I started working on the boat in the summers when I was 10 years old, and after graduating high school started fishing full time on our boat. I have been involved in trawling in Kodiak and the gulf of alaska for 19 years and am the 3rd generation family member to do so. Everyone in my family is a commercial fisherman, and our families and livelihood depend on gulf fisheries. We need and have been promised for a long time tools to deal with all the bycatch measures that have been put in place over the last few years.

I support alternative 2 of the GOA trawl bycatch management plan. I oppose alternative 3 because it does not remove the race for fish. Alternative 3 would put the fisherman against each other and put them out of business for the year so there would be less competition for the everyone else left, and the less boats that fish has a huge effect not only on the families that are dependent on the income from the boats that catch fish, but it also hurts the communities where those boats deliver their fish. Alternative 2 would encourage the fishermen to work together. When everyone works together, the vessels, the families involved with and dependent on the vessel and the community all prosper, and that's what we all want.

Thank you very much for taking the time to listen to the people and families affected by this.

Sincerely,

Beaux Howard
Deckhand on Family Owned and operated
F/V Collier Brothers

Sent from my iPhone

January 26, 2016

Agenda Item C-2 GOA Trawl Bycatch Management

Chairman Dan Hull
North Pacific Fishery Management Council
605 4th Ave. Suite 306
Anchorage Alaska 99501-2252

Dear Chairman Hull,

My name is Stoian Iankov, my family and I own/operate the Michelle Renee, a shore side trawler based in Kodiak, Alaska. We have been involved in Kodiak's trawl fisheries for 31 years. I depend on the Gulf fisheries for my livelihood and I want our fisheries and our communities to remain healthy for many generations. Alternative 2 will guarantee all of the above. We need and have been promised for a long time now the tools to deal with all the bycatch measures that have been put in place over the last few years.

The Council should not reduce the halibut and chinook PSC caps unless the goal is to put us out of business. 15% reduction in the halibut PSC cap means 15% less product going into the GOA communities. In 2015 the 2700 chinook salmon cap shut down the non-Pollock and non-Rockfish fisheries for 4 months. The only meaningful way to reduce bycatch is through co-op style management where everyone works together.

I strongly oppose Alternative 3 because:

1. There was no public input. Top/Down ideas never work.
2. If implemented will have a detrimental effect on the GOA dependent vessels. Because of allocating PSC on equal share or vessel capacity we will lose significant part of our historical access to the resource. Are We in the old Soviet Union?
3. Alternative 3 will not work no matter how much time is spent trying to adjust all the parts.
4. Our industry, our businesses, our community cannot afford the risk of implementing an experiment.

There are numerous examples of trawl catch share programs in the North Pacific: AFA, AM 80, Rockfish Program and the Fisheries in Washington, Oregon and California, that have stabilized fisheries and the communities. Catch shares with allocated target species have been in existence for over 30 years. These programs work great. **THEY ARE SUCCESS STORIES.** And the proof is here for everyone to see.

Alternative 2 has been a work in progress since 2012 and a lot of effort has been spent designing this alternative. Please move forward with Alternative 2 and drop alternative 3 and 4
No need to reinvent the wheel.

Sincerely,

Stoian Iankov



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

C-2 GOA Trawl Bycatch Management: Attn: Chairman Hull

1 message

Tanny Johnson <tjohnson@lexiconsolutions.com>

Tue, Jan 26, 2016 at 1:16 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

January 26, 2016

Agenda Item C-2 GOA Trawl Bycatch Management

Chairman Dan Hull

North Pacific Fishery Management Council

605 4th Ave. Suite 306

Anchorage Alaska 99501-2252

npfmc.comments@noaa.gov

Dear Chairman Hull,

My name is Mike Schones and I own/operate/work on the F/V Collier Brothers. 3 generations of my family have fished on the F/V Collier Brothers in the GOA; including my Dad, myself and my nephew for a combined total of 60 years.

I live in Oregon and have been personally involved in Kodiak's trawl fisheries for 30 years. I depend on the Gulf fisheries for my livelihood and I want our fisheries and our communities to remain healthy for many generations. We need and have been promised for a long time now the tools to deal with all the bycatch measures that have been put in place over the last few years.

I am heavily concerned at the radical way in which Alternative 3 has come about as a potentially viable option.

I support Alternative 2 of the GOA trawl bycatch management plan. If Alternative 2 fails to move forward as the Council's preferred alternative, I support status quo. I adamantly oppose Alternative 3 because it does not remove the race for fish, the critical component of a management program to foster cooperation and efficiency.

Below are my two main grievances with Alternative 3:

- Alternative 3 offers harvesters that have not fully participated in the fisheries the same advantage as harvesters

that have been heavily participated in the GOA fisheries. This allows non-invested harvesters the same benefit as the boats, crew and families that have been supporting these fisheries more fully, and it does not seem fair. It would allow harvesters who are not heavily invested in these fisheries the same benefits-- yet they have not paid the price, and put in the time.

- Moreover, Alternative 3 has been designed by people who do not work the fishery, and without the guidance and insights of the Captains and crews that understand the potential issues, and the financial risk to the people and communities that a change like this will likely incur. A solution must be achieved by the council working with the boats, captains and crews that have and have a track record of working with NOAA, State of Alaska, and NPFMC for a healthy and viable fishery.

Sincerely,

Mike Schones

Captain

F/V Collier Brothers



NPFMC comments - NOAA Service Account <npfmc.comments@noaa.gov>

Agenda Item C-2 GOA Trawl By Catch Management

1 message

Ocean Hope 3 <isioh3@gmn-usa.com>

Mon, Jan 25, 2016 at 3:15 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Chairman Hull.

My name is Marty Knott, and I work on the Ocean Hope 3, a shoreside trawler based in Kodiak. I have been involved in Kodiak's trawl fisheries for literally decades. I depend on the Gulf fisheries for my livelihood and I want our fisheries and our communities to remain healthy for for the generations to follow. We need and have been promised for a long time now the tools to deal with all the bycatch measures that have been put in place over the last few years.

I support Alternative 2 of the GOA trawl bycatch management plan. If Alternative 2 fails to move forward as the Councils preferred alternative, I support status quo. I adamantly oppose Alternative 3 because it does not remove the race for fish, the critical component of a management program to foster cooperation and efficiency.

please move forward with Alternative 2 and drop Alternative 3.

sincerely,

Marty Knott

This e-mail was delivered via satellite phone using GMN's XGate software.
Please be kind and keep your replies short.

Patrick O'Donnell
PO Box 3075
Kodiak, Alaska 99615

January 26, 2016

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

Agenda Item C-2 GOA Trawl Bycatch Management

Dear Chairman Hull and members of the Council,

My name is Patrick O'Donnell. I own and operate the F/V Caravelle out of Kodiak where I have fished and lived for the last 22 years.

I bought the Caravelle in September 2002 and over the course of the last 13 years have invested heavily in rebuilding the boat to get it to a level where it can be competitive with the Trawl vessels in Kodiak as well as making the vessel safer.

I am opposed to Alternative 3 because it is likely to cripple the Trawl industry in the GOA and have a major impact on the city of Kodiak where over half of the fish across the docks is groundfish, and 70% of all is harvested by Trawlers.

There are no PSC ONLY Trawl management programs anywhere in the world so why would we want to go down an unpaved road and experiment with the livelihood of fishermen as well as the economy of Kodiak? Allocating shares of PSC without allocating target fish will not end the race for fish and is more likely to result in closures, which will hurt local trawl businesses, Kodiak processors and the community of Kodiak.

In June 2012 the council took action on Amendment 95 to reduce GOA Halibut PSC limits to Trawl catcher vessels phased in over 3 years, 7% in 2014 5% in 2015 and 3% in 2016. At that time the council promised that this was a first step and began the process of working towards a Trawl Bycatch management Program to provide the fleet with tools to meet the new PSC limits.

Here we are four years later under further restrictions and no tools to help the fleet. Amendment 95 reduced Halibut PSC by 3% in 2016. Amendment 97 set a cap of 2,700 Chinook, which shut down the fishery in May, 2015, and today we are no closer to having the tools we need to function, including catch shares or cooperative structures that that would end the race for fish.

Council Goals and Objectives of a Gulf Trawl Bycatch Management Program

I think the Council needs to take a hard look at the Goals and Objectives and explain how Alternative 3 will meet the Goals and Objectives as laid out by the Council. As a fisherman who has spent all of my life fishing I cannot see how Alternative 3 will function to meet any of the Goals and Objectives, rather, I see this as a means for destroying a perfectly sound and stable industry. Alternative 3 does not provide the

flexibility needed by the fleet to operate successfully under existing PSC hard caps. I do not agree with allocating PSC equally among all license holders because this approach does not reflect historical participation or investments made into the fishery and could result in a 30% increase in "participation" by allocating PSC to licenses that do not currently fish. Besides weakening existing businesses this would also encourage novice participation that might result in even more PSC being taken.

We are now getting in to the tenth year of having the rockfish program in place, with five years under the Pilot program and four years under the rockfish program. The rockfish program has proven to work very well in regards to lowering bycatch rates in halibut. The program provides flexibility for the fleet by stopping the race for fish and providing mechanisms for coop managers to slow down the fleet based on Chinook and halibut rates.

I do not support 100% observer at this time because the additional cost on the fleet will be a significant new burden without providing a commensurate benefit to anyone. Based on the cost of observers for the Caravelle in the 2014 rockfish program, the cost for my vessel in 2015 would have been \$120,000 dollars under 100% observer coverage. This amount does not include weather days or travel days, and represents from 5%-8% of my gross income. The agency has done a good job with the existing program as it is today and has increased the statistical reliability of data collected by the program. Recall that one of the most important goals for restructuring the observer program was to reduce bias and expand observer coverage to a broader range of participants in the groundfish and halibut fishery. I feel that the observer program should stay the same as it is right now where the agency has the ability to continue to increase the coverage rates based on the amount of data required.

I support Alternative 2 moving forward at this time and having it fleshed out in more detail. The fleet needs a program put in place, and has been waiting for too long. The new program can be looked at during the five year review and at that time if the council feels the need for further reductions in PSC then that is when it should take place, not on the front side of the program.

Sincerely,

Patrick O'Donnell



January 24, 2016

Agenda Item C-2 GOA Trawl Bycatch Management

Chairman Dan Hull
North Pacific Fishery Management Council
605 4th Ave. Suite 306
Anchorage Alaska 99501-2252
npfmc.comments@noaa.gov

Dear Chairman Hull,

Please accept these comments on behalf of Pacific Seafood:

Recently Pacific Seafood was asked by the Kodiak Borough and Council Fisheries Work Group to submit comments regarding the trawl alternatives that are presently be considered and analyzed by the Council. I believe some of the questions and concerns the Community of Kodiak has wrestled with are also a good base for the Council to use in their evaluation. This does not mean to suggest that the Kodiak community has only one perspective or agrees with Pacific's conclusions, however many of their questions pertain directly to what the economic outcomes are that the alternatives may deliver to their community, their residents, harvesters that work the waters adjacent to Kodiak, and the processors that have made large investments on the Kodiak waterfront.

One question is presented in this commentary along with a summary of our original answer and additional comments. We hope you will give our comments consideration in your deliberative process to analyze the bycatch alternatives you have selected.

Working Group question for Processors: **What opportunities and risks do you see with respect to each alternative?**

Summary of Reply: Pacific has a long experience in trawl fisheries, including open access, limited entry, and some years working under two IFQ management systems, on the US West Coast, and in Canada. We have operated vessels and processing plants in these regions and under each of the above management frameworks. Our vessels and plants are managed for the most part by local residents who have long term ties to their communities. Through our collective experience we feel qualified to speak to the above question.

First: CFA: In general US fisheries are myriad in number and diverse in character. Industrial scale fishing is much different than artisanal scale. This is displayed in capital needs, vessel and plant size, and approach to markets. Without going into great detail, Pacific does not believe that a CFA management system is an appropriate match to an industrial scale fishery such as the GOA trawl fishery. It is not pragmatic for a third party with objectives that may not be aligned with the primary stakeholders to manage quota allocation and disposition, and may be contrary to best business practices and best long term, sustainable use of the resource. The Seafood Industry is already one of the riskiest and most regulated industries in the United States. While we agree that fishing communities have vested interests in the economic and biological health of the fisheries, it is our view that the collective community is not the entity that should assume a primary management role in the GOA fishery itself. Fishermen and processors have made the economic and human investment in the development of the fishery and the processing plants, and who have dependence on access to a healthy and sustainable resource.

The critical nature of this dependence should be well understood and safeguarded by managers and management framework. Too often it is tenuous and risky. Inefficient or poorly functioning management systems that do not promote each of the elements; conservation, habitat protection, ecological function, and optimum yield, are an impediment to business and investment. Perhaps worse, such programs may stray from meeting specific economic and conservation objectives outlined in MSA and the National Standards. Fishermen and processors have the most vested interest in protecting our fisheries and insuring that we are using best operational practices to preserve habitat and conserve target and bycatch stocks. Their investments and livelihoods are directly dependent on sustainable fisheries, flexible management, responsible behavior, and resource access.

We see it as equally true, that the harvesters and processors who rely on the community to conduct their business have a civic and shared responsibility to protect the interests of that community. We distinguish however that this does not equate to community control of harvest quota share or the disposition of the derivative harvest pounds that are associated with those shares.

NMFS IFQ programs, including coop based programs, are based on economic market principle and individual and collective accountability. A fundamental proposition is that those who have invested their capital and lives in the fishery have the most to gain (or lose) through responsible behavior in prosecuting the fishery. The assets that are most valuable to these primary stakeholders are the fisheries stocks themselves. In order to protect those assets, along with their deployed capital assets, fishermen and processors need to work within a management system that protects the stocks, including bycatch stocks, while allowing equitable, flexible, and efficient access to the resource.

As we have seen, when management systems allow a race for fish, inherent primary stakeholder motivation for protection of the resource, habitat, and environment loses priority. The dominate motivation is now the race for survival. Missing opportunity to fish may equate to a career ending outcome or loss of investment. In many fisheries it has led to overcapitalization as harvesters gear up to catch, or processors to process, more volume in shorter intervals.

While proponents of Alternative 3 believe an allocation of PSC bycatch quota to harvesters and/or processors is the solution to bycatch reduction, Pacific believes assertions about Bycatch reduction through a PSC quota system are unsubstantiated and will produce deleterious consequences to the fishermen, processors, and fishing communities.

We would argue that with an allocation of PSC bycatch quota, and no allocation of Target species, there will still be a race to harvest the target species when all is said and done. Simply put if fisherman A does not race to catch the target species Fisherman B will. Although trawl gear modifications are showing some signs of mitigating bycatch the two basic methods to reduce bycatch are, Time and Geography. The allocation of PSC quota alone will make harvest more of a risk proposition, however the risk pivots on a choice between slowing down and picking the best location to avoid bycatch, and the alterative of having the target species quota taken by your competition while you were avoiding bycatch.

PSC quota allocation only produces a classic conundrum. Avoid bycatch, but gamble on losing your entire season

Juxtapose the PSC only quota allocation with a more standardized IFQ-Coop system with allocations of Target and PSC species: If you have control of your own target species quota, or are in a coop quota pool, you have the option of waiting or moving without being punished for making a responsible choice. You are now highly motivated to wait or change areas to avoid the risk of catching too much bycatch. You could forego your “access privilege” to your target species quota allocation. The main difference in a PSC only or a Target species/PSC quota system is, you will still have your target species in your wallet while minimizing the chance of a “shut out” event that eliminates your season. The high risk of losing your Target species quota allocation by excessive bycatch, dissuades harvesters in a catch share/coop based fishery from taking the chance of having a bycatch disaster event that shuts them down. When they know they can wait or move without the fear of losing access to the target species they can afford to take the time to move to another less risky locale or wait until the PSC bycatch risk diminishes. You still have “your” allocation of quota to catch and you do not fear that someone else racing for the “common” target quota in a PSC only quota fishery will eclipse your ability to harvest the target species.

The coop element reinforces this concept through peer pressure and coop bylaws and rules of conduct. In short it has been proven under AFA and other coop programs to reinforce behavior that will optimize your probability to harvest your entire allocated quota of target fish and minimize bycatch. A PSC quota only allocation fishery, even in a coop, will never achieve this end in our view, and may lead to a painful future overhaul of the regulations that govern the PSC quota only fishery; or worse trigger a long term erosion of economic stability and viability for harvesters and processors. In our estimation the downstream economic impact to the community could prove disastrous if a PSC only quota program as outlined in Alternative 3 is enacted.

For this reason we strongly recommend that Alternative 2 presented by the Industry Working Group is the only practical alternative that can realize the Council’s stated goal of Bycatch reduction while strengthening the GAO Trawl fishery and adding value to the sustainable public resource the Gulf of Alaska provides.

Sincerely, Mike Okoniewski

Alaska Operations Manager/Advisor: Fisheries Policy & Management
Pacific Seafood

Cc.
Dan Occhipinti
General Counsel and Director of Government Affairs
Pacific Seafood

Simon E. Burn

This e-mail was delivered via satellite phone using GMN's XGate software.
Please be kind and keep your replies short.

Ocean Hope 3 <isioh3@gmn-usa.com>
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Mon, Jan 25, 2016 at 3:59 PM

Dear Chairman Hull,

My name is Sean Serano and i co-operate the Ocean Hope 3, a shore side trawler based in Kodiak,Alaska. I live in Seattle Wa, and have been involved in Kodiak's trawl fisheries for 4 years. I depend on the Gulf fisheries for my livelihood and i want our fisheries and our communities to remain healthy for many generations. We need and have been promised for a long time now the tools to deal with bycatch measures that have been put in place over the past few years.

I support Alternative 2 of the GOA trawl bycatch management plan. If Alternative 2 fails to move forward as the council,s preferred alternative, i support support status quo. I adamantly oppose Alternative 3 because it does not remove the race for fish, the critical component of a management program to foster cooperation and efficiency.

Alternative 2 allows for changes in bycatch for the TOA and its what we have become accustom to and allows the trawl fisherman,s livelihood to continue. Alternative 3 does not allow this and could and would destroy the livelihood of individual trawlers and owners by creating unsafe working situations and or an accidental overage in bycatch which would shut down trawling for the year and devastate the ability of trawl fisherman the maintain a living and the up keep of vessels.

There are numerous examples of successful trawl catch share programs in the North Pacific: AFA,AM80 and the rock fish program. Catch shares with allocated target species have been in existence for over 30 years. These kind of programs work well when properly designed. There is no precedent for PSC-only co-ops-none, its never been done before. Our industry, our community cannot afford the risk to be the guinea pig.

Elements of Alternative 2 may need to be adjustment over the next year or so, but it is a design that we can work with. Alternative 3 will not work no matter how much time is spent trying tyo adjust the parts. Alternative 2 has been a working progress since 2012 and a lot of effort has been spent designing the alternative. Please move forward with alternative 2 and drop alternative 3.

Sincerely,

Sean Serano
Ocean Hope 3
[Quoted text hidden]

January 25, 2016

Agenda Item C-2 GOA Trawl Bycatch Management

Chairman Dan Hull
North Pacific Fishery Management Council
605 4th Ave. Suite 306
Anchorage Alaska 99501-2252
npfmc.comments@noaa.gov

Chairman Hull,

I am Lee Woodard and I am an Owner Operator of two Trawlers in the central G.O.A. I have operated the Leslie Lee as Captain for 25 years. I first came to Kodiak in 1980 and I was 15 1/2 years old. It was the last year of any King Crab harvest in the G.O.A. To say that I have seen many changes in the fisheries in the G.O.A. is a massive understatement. As a Trawler I have endured years of discrimination. At every turn my opponents, which are my fellow fisherman here, have consistently persecuted trawling.

The common factor in every argument against trawling, without exception, comes down to efficiency. I have caught fish in every way possible. I believe with every cell in my being, after 35 years of fishing, Trawling is possibly the best fishery I have witnessed. Bycatch, let's think about that term. It has been thrown in the face of Trawlers for as long as I remember, and that goes back to 1980. The fact is that if Bycatch, and its associated scrutiny, were pointed at any, and I mean ANY other fishery, they would be trembling. Fishing for crab in the Central Gulf and the Bering Sea I have seen Bycatch rates as high as 90%. I have also longlined for Halibut several times, for several years. Back in those days it was an all-out derby beginning with 72 hour seasons, to 48 hour seasons, to 24 hour seasons, and even 12 hour openers prior to I.F.Q.'s. All the while Trawlers have been blamed for any fishery to collapse, from the crab fishery, to the problems in the Halibut and Salmon fisheries.

At this point I am very aware how I sound. My words are very clear and to the point. The fact is, that Trawling competes only with Salmon as the largest money return to the state of Alaska. The problem with Salmon is that it only supports the communities in the Gulf for three to four months at best. Trawlers not only fill the gaps in between, but they provide a MAJOR role in the economics of the G.O.A. I testified to this council about crab bycatch. In my testimony I expressed the fact that with the extremely small bycatch of crab (1% of the biomass) and the removal of hundreds of thousands of tons of predatory species on the crab, that Trawlers are the only plausible advantage to the biomass of crab in the G.O.A. Crabbers only diminish the population by focusing on large adult males, and discarding all the rest. Meanwhile Trawlers are closed out of abundant and safe waters close to land.

I only have 36 years of experience as a fisherman, and so I do not expect any special consideration, but I have some very deep concerns with the situation before this council. We have a hard cap on Chinook Salmon in the non-pollock fisheries in the G.O.A. with absolutely no provision from management to deal with it. To this point, out of sheer desperation, the Trawlers have, with unprecedented action, taken steps to fix the problems management has given us. I personally have sacrificed hundreds of thousands of dollars to sign catch share agreements. Given my market potential, this is simply a fact.

I am not here to gripe about the past, I am here to say in a resounding voice, that this council needs to address and resolve the problems that Trawlers in the G.O.A. are facing. No other gear type has ever been on a level field with Trawlers on the issue of bycatch. Observer coverage, bycatch limits, discrimination, no other fishery has stood up through such opposition and survived. Shrimp collapsed in the G.O.A., Crab collapsed in the G.O.A. Salmon are cyclical in nature, what has remained sustainable above all else, TRAWLING. Give us the tools (complete rationalized management), what is the downside?

I have two vessels and over 15 million dollars invested into trawling in Alaska. I guess you can accurately say I have a definite stake in this. I have brought safe and reliable income for my crew and all the vendors in Alaska for decades. Have I made my point? If not, I fear that truth and reason are no longer a consideration of this council. It is not my intention to offend anyone when I say that I am deeply offended. Statistics, reason, consideration, concern and truth are what is behind Trawling. Trawling in the G.O.A. is important to the viability and stability of everyone that relies on G.O.A. fisheries.

Thank you for your time and efforts in this difficult matter,

Lee L. Woodard II.