

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

re: E 1 Staff Tasking

Dear Chairman Hull,

My name is Robert Hanson, I am currently the captain of the FV Oracle but in the past have been involved with the FV Stanley K, FV Shemya, FV Risky Business and FV Lisa Marie. I harvest over 90% of my fish from the Bering Sea, specifically area 4D/C.

We have had a systemic Orca problem since the late 90's that has gotten steadily worse. Culminating in this year having literally the worst trip of my career. Me and other longline fishers have noticed a persistent increase in the amount of juvenile and baby orcas along with greater numbers of pods especially the last 3-4 springs.

I feel partially this is a result of the freezer longliner fleet being present more of the year giving the whales a consistent food source as well as the whales learning our habits and adapting to our efforts to avoid them. For instance recently they have started to eat fish off my sets at greater depths and even ate fish off my line when I was not near our gear. I could determine this from half eaten fish with dirt in the wound.

This last April trip was the worst I have seen. In the past I have been able to lose pods and get some gear hauled before being discovered by another group of whales. This year there were so many pods spread out along the continental shelf that we were harassed nonstop. During this trip I estimate we lost a minimum of 12000#'s of sellable halibut not to mention wasted fuel 4000 gallons, and bait. All this for a 4,500# halibut landing.

The first day of fishing I set 2 strings out and ran back to the first set within 2 hours to pull it up. By the time I had the anchor at the rail we had 14 killer whales around us. So, I dropped the set and waited 14 hours hoping to lose them. That did not work and the whales ate all the fish that the fleas did not eat.

I then traveled 180 miles to the 4d edge to a spot isolated from major canyon areas. As I was setting 9 killer whales showed themselves one skate into the set. So I stopped immediately and we hauled the one skate after a 10min soak. I had 13 fish on the skate that we had set out.

I knew there were more whales on another boat up in Zhemchug canyon so, we went farther west to Prevenets canyon. I got one day of fishing in with not a lot of fish before another huge pod of 50+ killer whales showed up and harassed me for two days before I gave up. That pod tracked me 30 miles north of the edge and 35 miles west I drifted for 18 hours up there with no machinery running and they just sat with me.

We then headed back to the se for 48 hours and I attempted to fish but didn't even put a hook in the water because 12-20 killer whales were following me when I slowed down.

We then went to St. George Island and fished for 3 days on the last day we had 7 whales again. They robbed my line when it was on the bottom at about 42 fathoms.

We tried the St. George canyon on the way south but, did not get any fish because there were 20 whales.

Some of the pods we saw were the same ones but I am certain I encountered at least 4 different pods of Orcas.

We did not have an observer this trip but past years even carrying an observer I have been informed they do not account for our interaction with Orcas. Me and other halibut captains are concerned about the degradation of the halibut resource and underreported harvest due to Orcas's taking our fish, factory longliner's unobserved halibut by catch and also fish that don't make it off the bottom because we don't want to feed them to the whales.

During the spring through the middle of June halibut school up in certain depth curves along the edge of the continental shelf and in a few canyons. Pots would be a perfect way to harvest halibut at this time of year. I don't think pots will harvest as many of the "large" halibut, fish over 100#'s helping to rebuild our stocks. Using pots would also greatly reduce if not totally eliminate the incidental catch of all rockfish. I have Never caught a rockfish in a sablefish pot and have hauled thousands of those pots.

I implore you to alter the rules to allow halibut to be retained if caught in a sablefish pot in the Bering Sea. When we were allowed to use pots for sablefish it changed that fishery completely and I think the same can be accomplished with halibut retention. Pots are an ecologically friendly more efficient way to catch certain bottom fish.

Sincerely, Robert Hanson

Peninsula Fishermen's Coalition

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Dan Hull, Chairman

May 26, 2017

North Pacific Fishery Management Council

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In Re:
Observer Annual Report and E1 Staff Tasking

Dear Chairman Hull:

Thank you for the opportunity to comment on the Observer Annual Report. The Peninsula Fishermen's Coalition is still very concerned about the way in which landings are calculated for the <60' foot fleet, particularly for those vessels delivering to tenders. We are also concerned about how tender deliveries are assigned to a port of delivery. PFC continues to have issues with the accuracy of basket samples for salmon, and continues to push for a census for salmon. You should have received comments from members Ben Ley and Jody Cook which will contain more detailed discussion of these issues.

Kiley Thompson has spoken to NMFS about one of the tables, and any comments on that issue would be premature today. The question was about Table 3.7 which does not ascribe deliveries into King Cove. This is no doubt a problem arising out of the difficulties dealing with tender deliveries.

I had the opportunity to review a preliminary report on the OAC's recent meeting, and as regards the WGOA, we agree with the committee's recommendations.

In terms of PFC member participation in GOA trawl bycatch management overall, the Peninsula Fishermen's Coalition appreciates the efforts the Council has made to schedule GOA Trawl Bycatch Management discussions during meetings that allow maximum participation by our members.

We respectfully ask that the Council note that our fleet participates in the salmon purse seine fishery as well as the P. cod pot and trawl fisheries, the pollock trawl fishery, and many of the vessels also have halibut IFQ.

Therefore, we would ask that if at all possible, GOA Trawl Bycatch Management issues be scheduled December. The April meeting is not ideal, but some members could also participate in that meeting.

We continue to look forward to addressing salmon and halibut bycatch proposals for the WGOA, and working within the Council process to find solutions.

Thank you for taking our comments.

Sincerely,

Beth Stewart (for Kiley Thompson)