

MEMORANDUM

TO: Council and AP Members  
FROM: Chris Oliver *Chris*  
Executive Director  
DATE: December 1, 2005  
SUBJECT: Gulf of Alaska Groundfish Rationalization

ESTIMATED TIME  
6 HOURS  
(all C-5 items)

ACTION REQUIRED

(d) Review discussion paper on crew information

BACKGROUND

In October, the Council requested staff to explore potential systems for the collection of detailed crew participation data and report back to the Council at its December meeting. NMFS and ADF&G, with input from the Council staff, collaborated on a discussion paper which will be presented by ADF&G staff at this meeting. The paper is attached as Item C-5(d)(1).

## **Tracking crew participation in Alaska's commercial fisheries**

### **December 2005 staff discussion paper**

#### **Summary**

This discussion paper provides a preliminary description of issues and information needs for crew data collection in the Gulf of Alaska (GOA) groundfish rationalization program. It examines: (1) the Council's October 2005 crew data collection motion and potential clarifications that would assist in development of an analysis; (2) existing crew data and methods previously considered to enhance data on crew participation; and (3) initial evaluation of the data collection concepts suggested by the Council and specific issues that need to be investigated for further analysis of alternatives for crew data collection.

#### **Clarification of the Council's October 2005 motion**

The Council's crew data collection motion for the GOA groundfish rationalization program describes the general need for information collection to inform the analysis of "crew share elements" in the program. The current GOA groundfish rationalization motion contains two options for including crew in the rationalization program:

1. allocating groundfish quota to skippers and/or crew; and
2. including crew in a license program established for skippers.

The motion implies that a crew data collection program should provide information to help the Council determine appropriate quota share allocations to crew members, should it pursue that option. Evaluation of potential crew data collection methods would be greatly enhanced if the Council clarified the type of award criteria it envisions. For example, data requirements for quota allocations awarded equally to all eligible crew may be much less information intensive than quota allocations based upon payments to crew, or some other relative measure of the value that an individual crew member contributed to a vessel's operations or landings.

If the Council chooses to include crew in a license program developed for skippers instead of issuing quota allocations, linking crew with individual vessel activity (fishery landings) might not be required. Documentation such as tax returns or affidavits might provide enough information to determine eligibility for individual crew members.

Determination of the appropriate method for documenting crew participation will be assisted by identifying, to the extent possible, how the information will be used to include crew members in the GOA groundfish rationalization program.

#### **Existing crew data and previously considered crew data collection concepts**

A crew license registration system is presently administered by the Alaska Department of Fish and Game's (ADF&G) Division of Administration. When issuing a crew license, ADF&G collects individual identifiers for each person intending to participate as a crew member in state waters off Alaska. Data from the crew license registration program are not linked with the landing information collected by ADF&G on paper fish tickets or the electronic reporting system for the Bering Sea and Aleutian Islands rationalized crab fisheries. As a result, the ADF&G fishery landing reporting system does not provide a method to identify crew member participation in individual fisheries or landings. The number of crew licenses issued each year can be identified, but the participation patterns of the licensed crew members are not identified or tracked.

The definition for commercial fishing crew is found in Alaska state statute and includes an individual who fishes commercially for, takes, or attempts to take fish, shellfish, or other fishery resources of the state by any means, and includes every individual aboard a boat operated for fishing purposes who participates directly or indirectly in the taking of these raw fishery products. The definition of commercial fishing crew includes the crews of tenders or other floating craft used in transporting fish, but does not include processing workers on floating fish processing vessels that do not operate fishing gear or engage in activities related to navigation or operation of the vessel. Children under the age of 10 may also purchase a discounted crew license.

State of Alaska staff members have previously examined the possibility of linking crew identifiers to individual fishery landings data by modifying paper fish tickets to include crew identifier fields or using magnetic swipe cards to record crew participation. These ideas were considered to address different objectives than the Council is currently considering. Those examinations determined that the costs of implementing a crew data collection system were prohibitive and the programs were not pursued.

Although there are several potential methods for documenting crew participation, the technical and logistical challenges of linking crew members with individual vessel activity are significant. Implementing a data collection system for crew that is linked to landing records would alter a long-standing fishery landing recordkeeping and reporting system administered by ADF&G that covers all state and many federal commercial fisheries. Nevertheless, improvements in computer and internet access for fishery participants and the advent of an Interagency Electronic Reporting System for groundfish fisheries might provide an opportunity to implement a crew documentation system that meets the Council's objectives.

While more than one concept for crew data collection might be technically feasible, each has a unique set of costs that should be compared to the benefits of including crew members in the GOA rationalization program. There are several issues that may be useful to consider in a thorough analysis of any given concept:

- Does the proposal achieve the Council's policy objective?
- Is it the goal of the Council to produce information only for the purpose of allocating quota for the GOA groundfish rationalization program, or does it include collecting employment data for managing fisheries and responding to other Magnuson Stevens Act objectives?
- When will the crew data collection program be implemented and how will that be coordinated with other data considerations (qualification years, e.g.) for the GOA rationalization program?
- What fisheries should be included in the crew data collection program? Groundfish, halibut, shellfish? EEZ fisheries only?
- Is the proposal administratively simple or complex and how much coordination is required between state and federal agencies?
- Are there legal or jurisdictional authority issues?
- What are the accounting costs to each agency and how would the data collection program be funded?
- What are the relative burdens on vessel owners, operators, and processors?
- How do the benefits of the information collected compare with the costs of collection?
- What other unique policy questions, interest group concerns, constraints or political concerns could impact the various proposals?

### **Council motion from October 2005:**

*The Council wishes to initiate a system to generate verifiable, quantitative data to inform the analysis of crew share elements in the GOA Rationalization package as soon as possible. Toward that end, the Council requests staff to confer with NMFS and the State of Alaska to identify means for crewmembers to legally document their participation in harvesting groundfish beginning in 2006.*

*Concepts to explore might include, but are not limited to:*

- 1. Listing crewmember names, social security numbers, and/or crew license numbers on fish tickets*
- 2. Use of crew contracts*
- 3. Signed affidavit or other form developed expressly for crew participation documentation*
- 4. Crewmember swipe cards or electronic reporting method.*

The skipper and crew provisions in Alternatives 2 and 3 for the Gulf of Alaska groundfish rationalization motion are found in sections 2.2.8 and 3.5, respectively. Both alternatives contain a suboption to include crew in a license limitation program for certified skippers. The motion is fairly clear on the intended purpose and requirements of the skipper license program, but silent on how crew will be incorporated into the program. Alternative 2 contains an additional option that would allocate a specified portion of groundfish quota to skippers and/or crew. Both alternatives defer the developments of the skipper and crew provisions to a trailing amendment that is to be implemented concurrently with GOA groundfish rationalization.

Further analysis of crew member data collection options would be enhanced if the Council identified whether potential proposals to award quota or credit for historical participation to crew will be based on personal history of the crew member in fishery landings. If this is the case, the data collection method must provide a means to link with the ADF&G landing database. If quota is awarded uniformly to all eligible crew members or if a relatively general participation requirement was developed for crew quota, it would not likely be necessary to track crew member participation for each landing record.

### **History of crew data collection efforts**

In 2004, approximately 18,021 licenses were issued for crew member participation in commercial fisheries in Alaska state waters. Of that total 17,688 were adult resident and nonresident crew licenses and 63 licenses were issued to children 10 years of age or less. Other than this aggregate total count of crew licenses, little verifiable data exists regarding the crew labor force in the nation's most productive fishing region. In Alaska, discussion on the tradeoffs for including crew in dedicated access programs date back to the halibut and sablefish IFQ program. While some of those discussions focused on the policy debate and fairness of including various fishery participants in an initial allocation, there were also technical and measurement challenges associated with including crew in these programs.

In addition to providing crew documentation for consideration in rationalization programs, there are other potential benefits from tracking crew participation in commercial fisheries, such as:

1. documenting crew participation where fishing activity might have been impacted from fishery resource damage (e.g., hazardous waste spills);
2. creating options for voluntary crew unemployment insurance, fishery disaster relief and Trade Adjustment Assistance-type programs;
3. applying participation data to provide more reliable and estimates of the change in seafood employment and income in Alaska and elsewhere, and to compare the importance of this sector with other sectors of the economy; and
4. providing data to quantify labor costs for fishery economic modeling and assessment of FMP amendments.

For employment reporting purposes, participants in Alaska's commercial fisheries harvesting industry are considered self-employed and are not required to participate in state unemployment insurance programs. This is also the case in most other states and as a result, the commercial fishery harvesting industry is not generally included in national employment data collection programs coordinated by the U.S. Bureau of Labor Statistics.

Since harvesting businesses are not required to report the identities of crew members working on a given vessel to the state, the only record of crew members in Alaska comes from the annual issuance of a general crew license to each person seeking to crew in Alaska commercial fisheries. The crew licenses are issued and administered by the Alaska Department of Fish and Game (ADF&G) Division of Administration, but crew member identification information is not linked to other permit, landing or vessel data files. The licenses are also generic; there is no indication of which fisheries the crew member might participate in during the license year. Crew licenses issued by ADF&G are similar to sport fishing licenses—they are paper licenses with an assigned unique number. As a result, it is not currently possible to associate individual crew members with the fishery landings they participate in.

#### **State of Alaska definition of crew**

The State of Alaska's definition of commercial fishing crew is found in Alaska Statutes, 16.05.940. Definitions (4):

“commercial fishermen means an individual who fishes commercially for, takes, or attempts to take fish, shellfish, or other fishery resources of the state by any means, and includes every individual aboard a boat operated for fishing purposes who participates directly or indirectly in the taking of these raw fishery products, whether participation is on shares or as an employee or otherwise; however, this definition does not apply to anyone aboard a licensed vessel as a visitor or guest who does not directly or indirectly participate in the taking; commercial fisherman includes the crews of tenders or other floating craft used in transporting fish, but does not include processing workers on floating fish processing vessels who do not operate fishing gear or engage in activities related to navigation or operation of the vessel; in this paragraph, operation of gear means to deploy or remove gear from state water, remove fish from gear during an open fishing season or period, or possess a gill net containing fish during an open fishing period.”

Additionally, Alaska state regulation 5 AAC 39.110, Crew Member Fishing License Requirements states:

- (a) Each commercial fisherman who does not hold a valid interim-use or entry permit card issued by the Commercial Fisheries Entry Commission (CFEC) shall obtain a crew member fishing license before fishing in any waters of Alaska. A crew member fishing license is not required for the holder of a valid interim-use or entry permit card.
- (b) Not more than one crew member fishing license may be obtained by a person during any one calendar year.
- (c) A crew member licensee who does not hold a valid CFEC permit may crew in any fishery if he or she is working for the holder of a valid CFEC permit for that fishery.
- (d) A valid interim-use or entry permit card holder may crew in any fishery.

The Alaska state definition of crew applies to those operating fishing gear in Alaska state waters, includes crew members working on tenders, and may include properly licensed children. Holders of CFEC interim-use or entry permits may also crew in any state fishery without obtaining a separate crew license.

## Methods currently under consideration for crew data collection

The Council suggested four general methods of crew documentation for consideration. In general, the feasibility of each method depends upon whether the crew member must be linked to individual landing records or if a more general participation threshold is adequate. Methods to link crew information with landing records, whether it involves modifying fish tickets or utilizing an electronic reporting system, will be the most complex and costly to implement. Other methods, such as crew contracts or participation affidavits, are likely less costly to implement, but might not provide the level of participation documentation desired by the Council. The Council should weigh the benefits and costs of each method to determine whether it is feasible for documenting crew participation.

### *1. Listing crewmember names, social security numbers, and/or crew license numbers on fish tickets*

#### Paper fish tickets

The ADF&G fish ticket is a long-standing tool used for management of inshore and offshore fisheries. The fish ticket data are collected by ADF&G and utilized for internal inseason and long-term fisheries management. Recently, the fish ticket database has become a critical component in the allocation of fisheries quota in Council rationalization programs. Fish ticket data were not initially intended to be used as the basis for determining fisheries participation history in rights-based management programs and ADF&G must carefully consider proposed changes to the fish ticket program for this purpose.

Fish tickets are forms to document the landing, harvest and sale of fisheries resources in Alaska. Only licensed buyers, processors, exporters or catcher/sellers may obtain ADF&G fish tickets. As a general rule, fish tickets must be completed by the first purchaser of raw fish for all sales and/or processing of fish within Alaska state boundaries (three nautical miles from shore), and may be completed voluntarily by those participating only in the Exclusive Economic Zone (EEZ). The fish ticket is a legal document and requires the signature of the legally licensed vessel operator and the receiver or buyer. Since the majority of groundfish harvested in the Gulf of Alaska is delivered to shoreside processors, the fish ticket system would appear to be a feasible means to document crew member participation.

In the past, staff members at ADF&G and the Alaska Department of Labor and Workforce Development have evaluated the benefits and costs of utilizing the paper fish ticket as a tool to collect data on crew participation. Modification of the paper fish ticket is costly and time consuming for ADF&G staff and additional data collection is constrained by available space on the standardized form. ADF&G staff indicated that many groundfish landings now require most, if not all, the space on the paper form. Since the number of groundfish crew members can be up to five or six, it would be difficult to find space for crew identifier fields on the paper fish ticket.

Even if the fish ticket is modified, the costs and challenges associated with altering the collection instrument could be significant. Staff would require time to make programming and procedural changes to data collection and reporting systems currently in place. After the paper fish ticket is modified and reprinted, ADF&G must remove existing groundfish fish ticket stock from the field and replace it with new stock.

Altering paper fish tickets to include crew identifiers could also affect data quality on catches, negatively impact response rate and compliance with reporting regulations, and increase the time required to transcribe individual identifier data to the existing fish ticket. In addition, vessel operators are often trying to minimize time off the grounds spent at offload. Any activity, such as recording crew license numbers, that detracts from the focused purpose of the paper fish ticket data system could impose a burden on the fleet and create accuracy issues for fish ticket data sets used by fishery managers.

## Electronic landing records

An electronic reporting system for fisheries landings offers several advantages over paper fish tickets. Most importantly, it reduces duplication of costly manual data entry by the regulatory agencies involved in Alaska commercial fisheries, NOAA Fisheries, the International Pacific Halibut Commission and ADF&G. Implementation of the Interagency Electronic Reporting System (IERS) for the BSAI and GOA groundfish fisheries in the EEZ is scheduled for 2007. NOAA Fisheries will require participants in its eLog system to utilize the IERS for groundfish fisheries. All other groundfish participants may use the system voluntarily. The ADF&G does not plan to require the IERS for groundfish landings.

Implementation of the IERS for the groundfish fisheries might provide an opportunity to collect crew information electronically in conjunction with an individual landing record. Crew identifiers, such as license numbers, could be entered into the electronic landing report at the time of landing. This would add some additional reporting burden to individuals completing fish tickets, but would provide a way to link crew members with landing records. There would also be programming costs associated with changing the IERS to accommodate crew documentation fields.

A backup system utilizing paper fish tickets would have to be provided, however, because as currently envisioned, the IERS will not be mandatory for all participants in federal and state groundfish fisheries. In addition, individual fish buyers might not have internet access and some electronic systems might fail on occasion. Some groundfish participants are not expected to convert to electronic reporting for some time, if ever. If the Council determines that this method should be pursued, groundfish processors could be contacted to determine how many are likely to use the IERS for groundfish reporting to determine the likely coverage level for the IERS. If paper fish tickets must be utilized, they would have to be modified, reprinted, and distributed to those not using the IERS to report groundfish landings.

## General concerns with paper or electronic fish tickets for crew data collection

Current regulations require that the purchaser of the fish or shellfish be the "gatekeeper" of reporting. They make certain that the seller, usually the vessel operator, is properly licensed. If fish tickets were used to collect crew information, who would be the gatekeeper for crew documentation and ensure that crew members have the proper documentation? Who would be responsible for making sure all crew members are recorded? What if a crew member does not want to be recorded on a fish ticket?

In spring 2004, ADF&G staff conducted interviews with processors in Kodiak to gather information about business processes and potential challenges to implementation of the IERS. In general, processors were very concerned about the additional reporting burden of recording individual crew members on landing reports and did not want to be responsible for ensuring compliance.

A final issue to consider with collection of crew information on paper or electronic fish tickets is State of Alaska statutory requirements to protect the confidentiality of individual landing records. If crew member information is included on a fish ticket (or printed report from the IERS), and therefore associated with landing of a particular poundage amount, the crew member would only be able to receive the landing information from ADF&G by securing a third party release approval from the CFEC permit holder (skipper). Vessel owners with hired skippers are also subject to the confidentiality restrictions with respect to fish ticket information; ADF&G may not release landing record information to vessel owners without approval from the CFEC permit holder. However, if the fish ticket landing records are being utilized for a rights-based program, CFEC permit holders would have less incentive to provide crew members with access to their fish ticket landing records than vessel owners since Council rationalization programs have historically allocated most limited access privileges to vessel owners.

Nonetheless, crew members currently accept payment (crew share) based on the landings reported by CFEC permit holders without having guaranteed access to the official landing report. Since crew members are willing to accept the terms of current work agreements, perhaps the confidentiality restrictions would not be a significant concern.

#### Costs for modifying paper fish ticket or electronic reporting form

- Reformatting the paper fish ticket or electronic landing form (ADF&G)
- Reprinting paper tickets (ADF&G)
- Reissuing paper tickets to buyers (ADF&G)
- Potential negative effects on landing record data quality and compliance (ADF&G)

#### *2. Use of crew contracts*

The Council might consider crew contracts as documentation of participation in the groundfish fisheries. Proponents of this method suggest that crew contracts provide the agreed upon share percentages for individual crew members and could be used to determine crew quota share percentages. While crew contracts do usually supply the share percentages for individual crew members, it would be inadvisable to base individual quota allocations on these contracts alone. Contracts are completed prior to the fishing trip or season and might be partially or completely unexecuted due to unforeseen circumstances. Significant staff time would be required to verify fulfillment of the crew contracts to determine if the crew member met the participation criteria, and verification may be impossible in many cases since crew might exit the region, state, or country after a fishery is closed for the season.

This alternative might be feasible if the Council developed a general license or equal share program for crew that does not require a link to individual crew member history. Utilization of crew contracts alone does not provide a method to link crew members with individual landing records.

#### *3. Signed affidavit or other form developed expressly for crew participation documentation*

A signed affidavit offers similar benefits and drawbacks to crew contracts. An affidavit could adequately document an individual's participation in a fishery for the purposes of a general license or equal share program with minimal participation requirements. Without a crew identifier on the landing record, however, any further attempt to link a crew member with individual landings is difficult. Like a crew contract, an affidavit is a post-season data collection tool that creates recordkeeping challenges since crew might exit the region, state, or country after a fishery is closed for the season. Crew member tax returns (form 1099) might provide more reliable post-season documentation of fishing activity than crew contracts.

If a separate form or other reporting tool is developed to document crew participation, coordination with or additional utilization of the current ADF&G crew licensing program would be desirable to take advantage of the data collection method already in place. However, if any changes are made to the ADF&G crew license form or database, they must be approved and performed by the department. As with crew contracts and signed affidavits, a separate reporting form for crew members could provide adequate information for a crew license program, but would not provide a link to individual landing records without a corresponding crew identifier on the landing record.

#### *4. Crewmember swipe cards or electronic reporting method.*

Electronically readable crew cards could potentially provide crew documentation in conjunction with paper fish tickets or the IERS. There are two methods to do this:



- a. At the time of each landing, the crew card could be read electronically, and the fish ticket or electronic landing record number could be manually entered to link the crew member with the landing. This method could be utilized with paper fish tickets or the IERS, if it could not be modified to electronically capture crew information.
- b. If used in conjunction with the IERS, crew information could be captured and linked electronically with the electronic landing record.

The first method would provide a greater challenge for linking crew members to the landing record in that a separate, intermediate database would be created with the crew information. The crew database would have to be linked with ADF&G landing records, which adds analysis time and provides opportunities for error.

The limitations of utilizing the IERS for crew member documentation for GOA groundfish rationalization were outlined in the section discussing modification of fish tickets. These limitations included implementation in 2007 and potentially incomplete fisheries coverage since not all fish buyers are expected to participate beginning in 2007, and some will likely never be able to participate in the program. For those participating in the IERS, however, this approach would create a record of each crew member participating on a vessel and landing logged by the vessel operator, at the point and time that a landing record is created. This would provide a record of each crew member (and individual identifier data) present on a vessel delivering to a buyer. The specific elements of this data collection method are outlined below.

#### Use of existing crew license file

The ADF&G crew license file is presently an unutilized database. Each person intending to work as a crew member in Alaska is required to purchase a license each year and the licenses are sold through the ADF&G web site and at fishing and sporting goods shops and grocery stores. The crew application includes essential identifier data for each applicant, including a Social Security Number, and each license has a unique number assigned to it.<sup>1</sup> The crew license data is electronically captured, but not intensively error checked. The crew card participation program would require that each crew member be issued an electronically readable card (with a bar code, for example) containing the license number or other unique identifier. If used in conjunction with the IERS, the card would be read or swiped by a crew member or the skipper at landing. This collection of information would associate the crew member participation with an individual landing.

Alaska state law allows a CFEC permit holder to crew on any vessel operating in state waters without purchasing a separate crew license. If a crew participation program were implemented, it is unclear whether CFEC permit holders wishing to participate as crew would need to acquire a crew license as well. Ideally, proof of a current CFEC permit would be sufficient for participation in the crew program to maintain consistency with current state regulations allowing CFEC permit holders to crew on vessels.

Tracking CFEC permit holders acting as crew members will be an important component to consider as there may be a significant number of individuals who switch between operating a vessel and crewing during the year. Some CFEC permit holders might also use their CFEC permit solely to participate as a crew member during any given year. These participants would not be included in the ADF&G crew license file as it is currently collected.

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<sup>1</sup>The Right to Privacy act of 1974 mandates that if an applicant is required to provide a Social Security Number to government agencies, the agency must inform applicants why it is being collected and what the agency plans to do with the information.

### Capturing crew information

There are two primary options for electronically capturing crew identifiers in conjunction with the IERS: bar code and magnetic strip cards. A NMFS contractor familiar with bar code and magnetic swipe card readers and the IERS indicated that the required technology is readily available and relatively inexpensive. A wedge reader is a device that is plugged in between the PC and keyboard with few compatibility issues, installation complications or extra software requirements. The card reader is in the form of a swipe, gun or pen.

As a rough calculation, a preliminary study of the processors and technology could be conducted for approximately \$20,000 to investigate and verify the utility of capturing readable crew cards. If the simplest and most commonly adaptable option was viable (e.g. wedge reader), then the addition of a module to capture crew information from a bar code or data entry could be added to the IERS for approximately \$100,000 and four months time. Developing and issuing readable crew cards would be an additional expense. Of course, additional costs would be borne by all processors using the IERS for the purchase and use of the actual bar code readers. All of these costs should be considered when determining the feasibility of a crew card program.

The Intent to Operate registration system established by ADF&G is one potential tool for determining what processors or buying stations would be required to have the crew card reader. Each year, active fish buyers are required under Alaska state regulation 5 AAC 39.130 (a)(1) to submit an Intent to Operate application to ADF&G, which indicates the species they expect to purchase. Using the listed fisheries on the application as a reference, only those buyers participating in fisheries included in the crew data collection program would be required to have the crew card reader on site. In the past, many buyers, processors and exporters selected all fisheries available on the Intent to Operate application, whether or not they actually intend to participate in those fisheries. It is possible that buyers would provide a more accurate list of the fisheries in which they intend to participate if the listed fisheries were used to determine what facilities were required to have a crew card reader.

### Error Checking and Auditing

Crew member incentives for maintaining an accurate and independent recordkeeping of participation are likely to be substantial. Most participants in Alaska fisheries are aware of continuing efforts to develop dedicated access programs, and recognize that history associated with access can be valuable. Industry auditing of the crew participation data might be possible by allowing each crew member to access their participation records. For example, a crew member could go to a designated web site, enter their personal identification information, and view their record of participation on a vessel by CFEC permit number or name, or landing record number. While State of Alaska confidentiality regulations would prohibit landings information from being included on this record, it does not appear to prohibit provision of a record of a crew member presence on a vessel by fish ticket number, date and permit number. Many errors in participation records could be identified by such a user access system.

### Cost categories to assess and outstanding issues

Integrating a crew card program with paper fish tickets or the IERS would establish a system to collect verifiable and quantitative data, as specified in the Council's October 2005 motion. Collecting information on crew members might be more important for some groundfish fisheries than others, and the relative needs for documenting crew participation for various fisheries should be assessed. Some areas to consider for establishing costs estimates include:

- Annual costs of issuing crew cards (ADF&G)
- Assess need and costs to issue new CFEC permit cards with bar codes (ADF&G/CFEC)
- Initial cost of purchasing bar code readers
- Programming and set up costs for NMFS and/or State of Alaska
- Training in use of bar code readers (or other appropriate magnetic reader).
- Individual burden cost on permit holders

NOV 29 2005

Dear Stephanie,

Along with my wife Joan we own the 58 ft F/V Sea Dream. We have owned the Sea Dream since 1985 and have been fishing Pacific Cod with pots since 1990. We find it very disturbing that the State of Alaska is trying to take our fishing history inside 3miles away from us. How can this be after we have fished pacific cod for almost 16 years, never missing a season, and now we are threatened with the very good possibility of not receiving any shares at all!

We urge the North Pacific Fishery Management Council to please not leave us out of their rationalization plan. We have raised 2 children on Kodiak and are full time residents who just want we have worked for nothing more nothing less. I could go on but realize you are probably busy reading many faxes and letters pertaining to this very important issue. We appreciate your time and hope that you will do the fair thing and include us in your plan.

Sincerely,

Mark&Joan Levenson  
 Box 1284  
 Kodiak Ak 99615

*Joan Levenson*  
*Mark Levenson*

*To Stephanie Madsen Chair*

*NP FMC*

*605 West 4th Ave.*

*Suite 300*

*Anch AK 99501*

*From Mark + Joan Levenson*

*907-487408*

Ms Stephanie Madsen  
North Pacific Fishery Management Council

Re: Agenda Item C-5 Gulf of Alaska Groundfish Rationalization

Madam Chair

My name is Charlie Parsons I am owner operator of the 74ft. F/V NightWatch. I have Twenty Years experience in the Cod and Polluck fishery in the Gulf of Alaska. I've seen it go from eight to ten month fishery to eight to ten days! I see my expenditures go up by over 50 percent and my income go down by over 70 percent. I need rationalization now not tomorrow not next week now! The race for fish has to come to an end, for the fishery, for safety and for the economics.

Charlie Parsons  
P/O Box 2339  
Homer Alaska 99603

REC

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NOV 2 2005

Ms Stephanie Madsen  
North Pacific Fishery Management Council

Re: Agenda Item C-5 Gulf of Alaska Groundfish Rationalization

Dear Madam Chair,

My name is Rick Willis and have been the captain of the trawler Cape Kiwanda for the last sixteen years. We fish in the Gulf of Alaska, out of Kodiak, and in the Bering Sea. I believe we are one of the smallest trawlers in the AFA. Since rationalization has gone into effect in the Bering Sea it has benefited us greatly. We are no longer forced to fish in extremely unsafe weather conditions to compete with larger boats.

Also I believe the price of fish would increase, because we could slow the fisheries down and provide a more quality product for a longer time period of the year.

I also know that bycatch would be greatly reduced. Because we would have more choice of when to fish. Trawlers want to fish clean!

The current race for fish is detrimental for safety, the environment, and the economy.

I am asking you to support the trawl sector in our effort to move forward immediately with establishing rationalized co-ops for all Gulf of Alaska groundfish species.

Thank You Very Much, Rick Willis

**RECEIVED**  
NOV 30 2005**CREWMEN'S ASSOCIATION****"Where the rubber meets the deck"**November 30, 2005 **P.F.M.C.**

Attn; Chris Oliver, Exec. Dir.

To; Mr. Secretary and members of council

Re; GOA Rationalization

As you well know, in BSAI crab rationalization the majority of working crab fishermen were excluded in allocations of fishing rights and displaced by the rapid consolidation of the fleet. If increased safety was really an objective, there would have been some consideration of the effects of privatization on the livelihoods of so many American fishermen. It seems that in the pursuit of "ending the race for fish" a race for private ownership of our nations public resources has been provoked. Why the hurry? Our crab stocks are increasing in the Bering Sea, GOA groundfish aren't threatened. It seems the powerful trawl and processor lobbies are more of a driving force in this policy formation than any other factor. Ownership of our resources by boat owners and of the markets by processing corporations benefit the few, at the expense of many.

Therefore, we respectfully suggest the following proposals;

**1. Maintain status quo**

A. Our GOA groundfish fisheries presently support a wide range of fishermen, their families, marine support businesses, coastal communities, and tax bases. If Crab Rat is an example of successful rationalization, GOA Rat is not a viable option for the majority of stakeholders.

B. Implement an independent study of the established socioeconomic effects of Crab Rat, and the possible effects of GOA rationalization before any further privatization of our public resources.

2. If you must push forward with the privatization of our GOA groundfish, make certain all American fishermen involved in the harvest of said resource are meaningfully included.

A. Skippers and crew should be allocated a portion of the resource, proportionate to their respective historic shares in each gear sector.

B. To facilitate this, a crew registrar should be implemented by the council, with crew contracts presented by boat owners and substantiated by skipper and crew affidavits and income tax records.

3. Allocate NO harvest rights to processors.

A. Ownership of our resources by domestic or foreign processors would effectively control our seafood markets.

B. Bypassing American fishermen would be detrimental to their families and

communities.

C. Allocation of harvest quota to foreign owned corporations would, in effect, re-foreignize America's fisheries, contrary to the MSA.

4. In the event of no skipper/crew harvest allocation, any harvest co-op formed in GOA Rat that reduces the catcher fleet, eliminating skipper and crew positions, should have provisions for continued crewshare distribution, just like absentee owner lease fees in BSAI Crab Rationalization.

A. If this option isn't acceptable, outright grants, or a "buyback myback" program should be implemented to ease the transition of displaced fishermen into other industries or relocation to areas of opportunity.

5. Duplicate the skipper and crew provisions vaguely mentioned in alternative 2 of GOA rationalization into alternative three, and specify such provisions.

6. Implement owner on board provision in all privatization schemes to prevent absentee ownership and consolidation of quota.

Your careful and fair consideration of all involved stakeholders will ensure the continued success of our fishing communities, Thank You

Steve Branson

  
President,

Crewmen's Association

## Alaska Draggers Association

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**P.O. Box 991  
Kodiak, AK 99615  
(907) 486-3910  
alaska@ptialaska.net**

November 28, 2005

Ms. Stephanie Madsen, Chair NPFMC  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252

RECEIVED  
NOV 30 2005  
NPFMC

Re: Gulf Groundfish Rationalization, Dec. 5 NPFMC Meeting, Agenda Item C-5

Dear Ms. Madsen:

The Alaska Draggers Association urges you and the North Pacific Fishery Management Council to continue the process of rationalizing the Gulf of Alaska groundfish fishery. We also would like to see the process remain on track to keep the Gulf trawl fleet from being further marginalized in relation to other competing fisheries.

The Council and the Gulf trawl fleet have worked hard over many years to establish a sustainable fishery, however we need additional tools to compete in the changing global marketplace and provide economic and ecological stability long into the future. We believe it is vital that the Gulf trawl fleet be rationalized as soon as possible in order to maintain the stability of our fishery and enhancement economic and cultural fabric of our sector of the Gulf groundfish fisheries.

The future of the Kodiak-based trawl fleet is more than just a local issue. Our fisheries are sustainable and our product is healthy. It's important that we continue to protect and enhance the production of the Kodiak fleet to develop market-driven products that will maintain our position in the larger market place.

The Gulf groundfish fleet is experiencing considerable economic stress. Our fleet is largely made up of family-owned businesses which are struggling, as are Kodiak's resident processing workers. The trawl fleet accounted for 49% of the total Kodiak port landing by volume for 2004. This volume is critical to maintain the year-round processing capabilities of the largest landing port in the Gulf of Alaska.

Kodiak's processing workers are unique in that they are largely local residents who live in town year-round. They are a vital part of our community's population and culture. It is imperative that we maintain year-round processing activities that provide stable jobs for this vital sector of Kodiak's workforce. We have already begun losing processor workers with the resulting detrimental domino

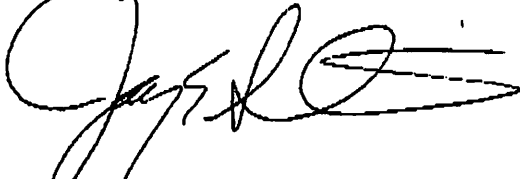


effect on our schools, housing markets, and local retail segments. Rationalizing the Gulf groundfish fisheries will allow us to spread out catches and processing work to periods that make more sense in a market-driven industry, and will extend the work year for the processing fleet, stabilizing that sector of our workforce.

As the major groundfish producers in the Gulf of Alaska and vested stakeholders, we feel it is extremely important that the agenda item concerning Gulf Rationalization continues moving forward and that the council adheres to its projected schedule.

Thank you for your consideration and hard work related to developing a rationalization plan for federal fisheries in the Gulf of Alaska.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay E. Stinson", with a long horizontal flourish extending to the right.

Jay E. Stinson, president  
Alaska Driggers Association

December 2005

Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave., Suite 306  
Anchorage, AK 99501-2252

Agenda Item C-5 Gulf of Alaska Groundfish Rationalization

Dear Members of the NPFMC,

My name is Theresa Peterson and I am a longtime commercial fisher from Kodiak Island. My family and I own a small fishing vessel and harvest Tanner crab, pacific cod, halibut, herring and salmon. Access to each of these fisheries provides a link to our abilities to maintain a viable fishing business in this community. The management system requiring owner on board and active participation in the fishery is what sustains us as we can afford to buy in and are willing to go out and catch fish. However, the policy shift toward rationalized programs threatens to undermine our abilities to compete as the trend leans toward too much money chasing too few fish. I am seeing a number of parallels that concern me in established rationalization programs around the world and what is now taking place in the waters of Alaska. The greatest consequences are falling on the shoulders of the smaller, independent, coastal resident fishermen.

Quota management systems were established in New Zealand in 1986 to increase the biological and economic productivity of their fisheries. Today the quota system governs 85% of New Zealand commercial catch and after 20 years over fishing still remains and excessive consolidation of quota has created monopolies. In the mid 1990's quota holders began forming quota owner associations with liberal limits on the amount of quota an individual or company could own. As a result, by 1997 only three large fishing companies control 60% of quota shares. Someone has to lose access for others to gain and in this case it was the small scale and native fishermen.

In British Columbia a similar trend has been occurring since the implementation of history based allocation and quota systems was established. Coastal community residents, historically dependent on access to the fisheries, have lost the rights to fish as they are unable to compete with those with deep pockets. As Eric Enno Tamm from Ecotrust Canada writes, "Individual quotas create big winners and big losers. Those initially granted quotas by the government earn a windfall profit because the public resource is given to them for free. But as the price for quotas rise, poorer fishermen find it impossible to buy these expensive fishing privileges." The ownership of licenses and quota is migrating to the metropolitan areas such as Victoria and Vancouver and away from rural communities. This policy, whether intentional or not, favors urban-based corporations and individuals with greater access to capital and economic opportunities.

Closer to home, the surf clam and ocean quahog IFQ programs off the coast of New Jersey allocated shares based on past history and the shares were transferable. The result

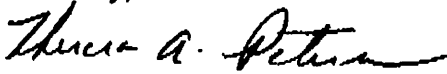
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was a decline by 74% for participating fishing vessels in the surf clams and for ocean quahog it was 40%. The General Accounting office has determined that one entity now controls 27% of the surf clam quota.

Those of us who live in fishing communities such as Kodiak are aware of similar consolidation trends in the halibut/ sablefish where large quota holders are bending the rules to acquire more quota by placing the quota in other peoples names. It is difficult if not impossible to control and the trend is well established. The price of halibut has risen so that it is no longer possible for the average income earner to purchase shares. This income bracket encompasses the bulk of the residents in rural communities. Crab quota can be found now at brokerage firms for upward of \$30.00 per unit already. Who can afford to buy this except for very wealthy fishermen owning substantial amounts of quota. The rich seem to be getting all the gain here.

I urge the Council to continue exploring options that may serve to reverse this trend that results in negative impacts toward Alaska's coastal communities. Let us learn from past mistakes and strive to implement fishing policies which preserve the unique fishing cultures which are desperately hanging on.

Sincerely,



Theresa Peterson

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ALBERRG

Charles G. Johnson  
F/V Irene H - F/V Midnite Sun - F/V Linnea - F/V El Tigre  
Box 813, Kodiak, AK 99615  
phone: (907) 486-4320, fax: (907) 486-2633  
November 30, 2005

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Ms. Stephanie Madsen, Chair  
North Pacific Management Council  
Anchorage, AK 99501

C-5 (b): GOA Groundfish Rationalization/need to rationalize the Pacific cod pot fleet together with other sectors, and to not expedite rationalization of the trawl fleet

Dear Chair Madsen,

I am opposed to the rationalization of the Gulf of Alaska groundfish trawl fishery separately from rationalization of the GOA p. cod pot fishery. I object to a process that expedites the time line for rationalization of the GOA trawl fishery at the expense of rationalizing the GOA p. cod pot fishery. All sectors of the GOA groundfish fishery should be rationalized together. It especially makes no sense to rationalize the GOA trawl p. cod sector separate from the GOA fixed gear p. cod sectors, and especially separate from the GOA p. cod pot sector. The GOA p. cod sectors impact each other, and it is not sensible to rationalize the trawl sector separate from the pot and longline sectors. The GOA p. cod sectors have interrelated influence and impacts on each other, and it is important that the interrelated influences and impacts should be analyzed and considered together, before any sector is rationalized. Any rationalization plan for the GOA p. cod fishery must analyze, balance and consider these interrelated impacts. The development, planning, analysis and implementation of rationalization for all GOA groundfish sectors, and especially for the GOA p. cod sectors, must proceed simultaneously. It appears obvious that implementation of a rationalization program for the trawl and pot p. cod fisheries must commence at the same time. Otherwise, the GOA trawl sector will accrue many pricing, marketing and safety advantages and benefits at the expense of the GOA p. cod pot fleet. Not only will this circumstance leave the p. cod pot fleet in a destabilizing and economically destructive race for fish, but it will, in a comparative sense, put the p. cod pot fleet at a significant competitive disadvantage to the trawl fleet.

The GOA trawlers should not be provided with any more advantages over the p. cod pot fishery, and they should not be given any more special benefits that result in any more delays in the rationalization of the other sectors. The Central GOA trawl fleet was recently responsible for delaying forward progress of GOA rationalization for all of the other GOA groundfish sectors by having successfully lobbied Congress to order the Council to split out their Central GOA trawl rockfish sector for special treatment and rationalization. The Council should not provide any more special advantages for rationalization to the trawl sector that negatively impacts the rationalization needs of the other sectors.

The GOA p. cod pot fleet needs to be rationalized. The stability and value of my investment and profitability, and the stability of the investment and profitability of many others like me, is at greater and greater risk the longer that the rationalization of the GOA p. cod pot fishery is delayed. For example, further delays in the development of the analysis and the implementation date for GOA p. cod pot rationalization can eventually undermine the value of my historical participation in this fishery, and my standing in the qualifying years. In addition to the impacts to my comparative and relative standing with respect to my historical participation and qualifying years, the current race for fish is unhealthy, unprofitable, and limits opportunities for maximizing the profitability and value of my product.

On a related issue, I understand that the state of Alaska is trying to figure out a way to take the GOA p. cod fishing history away from many small fishermen who fished in the federal p. cod fishery inside three miles. It is shocking that the state of Alaska is trying to seize this history from these people, and by doing so, push these folks to the brink of economic ruin. I also understand that the state position in this matter may be partially responsible for the delay in moving forward with rationalization of the p. cod pot sector, and that their position may also be partially responsible for the initiative to rationalize the trawl sector on a faster time line and in advance of the p. cod pot sector. If this is true, the Council and NMFS should not permit the state to use this purpose to further delay the process of moving forward with rationalization of the GOA p. cod pot sector. And, the Council and NMFS should not let the state take this history from these fishermen. The state does not have to take the position of taking this history away from these people, and the Council and NMFS do not have to give in to the state on this issue. These fishermen have every right to be awarded the history that they earned, and they should have the opportunity to use their history to participate in a rationalized p. cod fishery.

I am a partner in several vessels that participate in the Gulf of Alaska federal p. cod fishery. I have been fishing in Alaska since 1967, and I have been fishing p. cod with pots since the late 1980s. My partners and I will receive a reasonable assignment of fishing privileges under GOA groundfish rationalization. Continued delays in GOA rationalization undermine and diminish the value of our past, historical, current and future participation in the GOA p. cod pot fishery. Please do not rationalize the GOA trawl fishery before you rationalize the p. cod pot fishery. Please move forward with rationalization of the p. cod pot fishery. Please consider that the needs of the p. cod pot fleet should not be considered as any less important than those of the trawl fleet.

Sincerely,



Charles G. Johnson

Norman Mullan Fisheries, Inc.  
Norman Mullan, Owner/Operator  
F/V Cindria Gene  
Box 92  
Kodiak, AK 99815  
November 29, 2005

RECEIVED  
NOV 30 2005  
N.P.F.M.C.

Ms. Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
805 West 4th Avenue Suite 306  
Anchorage, AK 99501-2252

Agenda Item C-5 (b): Allocation of my federal p. cod pot fishing history, and my qualification to participate in GOA groundfish rationalization

Dear Ms. Madsen,

I am a participant in the federal GOA p. cod pot fishery. Commercial fishing represents 100 per cent of my income. I am a small independent businessman. I own and operate the F/V Cindria Gene (a 53' steel combination vessel). I have been fishing for 34 years. I am a third generation Kodiak fisherman.

I have been harvesting GOA p. cod with pots continuously since 1991. Approximately 98 percent of my entire federal GOA p. cod pot fishing history during the federal GOA p. cod fishery has been earned within three miles. My crewmembers, their families and myself (all local Kodiak residents) rely heavily on the federal GOA p. cod pot fishery. I have had a GOA groundfish LLP since LLPs were required for harvesting GOA groundfish. I have had a federal fisheries permit in all of the years that a federal fisheries permit was required. In fact, I was required to fill out a federal groundfish logbook until vessels under 60 feet became exempt from the federal logbook requirement. If the Council uses the criteria that is currently included in your alternatives for GOA groundfish rationalization, I want to retain my rights to participate in the federally rationalized GOA p. cod pot fishery.

I believe that the Council should rationalize all gear types in the federal GOA groundfish fishery at the earliest opportunity.

As I have previously testified to the Council, I object to the fact that the State of Alaska continues to unjustly attempt to confiscate my federal p. cod pot fishing history. The state of Alaska did not earn my federal p. cod pot history, I did. For the past 15 years, my crew and I have taken a great deal of risk to participate in the federal GOA p. cod quota. The state of Alaska took no risk, and yet, they continue to claim the rights to my hard earned federal p. cod history. I have invested a great deal of money and sweat equity on a continual basis over the past 15 years to continually re-equip my vessel so that it is safe, efficient, and competitive. The state of Alaska did not invest one penny in my vessel.

I deserve to receive the same rights and privileges for the federal GOA p. cod history that I earned during the federal GOA p. cod fishery inside of three miles as will apply to fishermen who earned their federal history outside of three miles during the same federal fishery. I deserve the same rights and privileges to own, use and transfer the fishing rights that I earned in the federal GOA p. cod fishery inside three miles as those fishermen who earned their history outside of three miles.

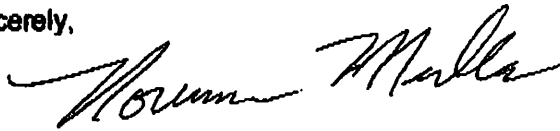
As I have previously testified, I am agreeable to harvest my allocation of federal fishing rights under a federally rationalized GOA p. cod fishery outside of three miles.

I respectfully request the Council and the Secretary of Commerce to not allow my federal GOA p. cod history and fishing rights to be made available by the state of Alaska to fishermen who may have never even previously fished in the federal GOA p. cod fishery, or even to fishermen who will receive fishing rights to participate in the federally rationalized p. cod fishery.

I respectfully request the Council and the Secretary of Commerce to not transfer to the state of Alaska any of my personal federal fishing history, my qualifications or my rights that I earned in the federal GOA p. cod pot fishery. I want to participate in a rationalized federal GOA p. cod pot fishery. I earned the qualifications and the rights to participate in a rationalized federal GOA p. cod pot fishery. My business will be seriously harmed and damaged if the Council and the Secretary of Commerce allow the state of Alaska to confiscate my personal federal fishing history, my qualifications, and my fishing rights that allow me to participate in a federal GOA p. cod fishery.

I would like to add that Doug Hoedel, a NPFMC member fished this same fishery in the early 1990's. I am sure he could explain the situation if there were questions of the parallel fishery matter.

Sincerely,



Norman Mullan  
Telephone 907-486-5012  
Fax 907-486-6048  
njmullan@alaska.com

11.30.05

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Dear Members of the NPFMC

My name is Rhonda Maker and I have lived in Kodiak since 1981. I worked in the fishing industry for 13 yrs, incl. 10yrs. as a ~~setter~~ set-netter in Kodiak.

I now own 2 businesses, The Treasury (gifts) + The Treasury Home! (Furniture).

I am writing to oppose your NOT PASS C-5, Gulf Rationalization.

The fish in the ocean are ~~not~~ a public resource, not a commodity that anyone has a right to put a name on, to give to anyone.

I got my start by fishing on boats that went out there + caught fish. What a person needed was guts + will + a chance + they could be successful in the fishing industry. I feel it is Un-American to give fish to anyone, as rationalization does. It creates a monopoly for a privileged + Lucky few + leaves everyone else out, unless you have a ton of money already to buy in, which leaves so many people out of the equation.

Our town is dependant on the fisheries. Remaining open access. We need those little gyp who come + go, not a ~~to~~ few big owners who spend their money in Seattle!

Please do not endanger our economy any more than I.F.Q.s + Crab Rationalization already ~~has~~ has!

The point should not be to make management easier, it should be to ~~sustain~~



facilitate a fair & sustainable  
fisheries, with communities, as  
real folks, in mind!

I want to continue to live & do  
business ~~in~~ Kodak, and I firmly  
Believe that Rationalization is  
Bad For Business!

Pls. listen to us! Thank you!  
Sincerely  
Klonda Maker

**Mar Del Norte, Inc.****F/V Mar Del Norte**

PO Box 471

Kodiak, AK 99615

mardelnorte@msn.com

11/30/2005

Ms Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, AK. 99501-2253

RECEIVED  
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NPFMC

Re: Item C-5 Gulf of Alaska Rationalization

Dear Madam Chair:

I am writing you to ask for your support in continuing to move forward with the rationalization of the trawl fisheries in the Gulf of Alaska. I understand that the rationalization of all gear types, for all areas, for all species, is a daunting task. My preference is to keep the full program moving forward but if that is not possible I implore you to keep the trawl fisheries rationalization program moving forward.

The present state of the trawl fisheries has become a real gamble with short openings (many no more than 24 hours) necessitating very intense fishing activity. These short, intense openings result in many negative impacts on the fisheries:

- 1) Safety Vessels are being forced to fish in horrible weather conditions or risk losing out on an entire opening.
- 2) Conservation These short openings give us very little opportunity to look for areas of less bycatch. By the time a new area is located the fishery is already over.
- 3) Fisheries Management These very short, intense fishing periods are very hard to manage with resulting periods of under-harvest, which results in the need for further openings, or over-harvest, which removes fish from future fisheries.
- 4) Economics There is great risk of missing the fish during the opening, with no opportunity to move to an area where there are fish to be harvested as well as the risk of having mechanical problems that can result in losing the income from an entire opening.

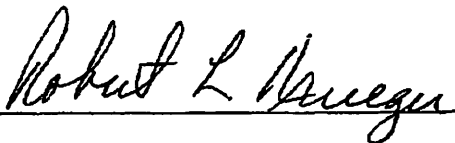
It is my understanding that the City of Kodiak and the Kodiak Borough are requesting an 18-month stand down period for the GOA Rationalization program so that the effects of the Bering Sea Crab rationalization program can be analyzed. I do not believe that there is any value in analyzing the effects of the crab program since these fisheries have nothing in common. While I understand the concern that the City of Kodiak and the Borough of Kodiak have regarding the effects of rationalization, I believe that it is shortsighted of them to try to stall this program. Their concerns that delivery patterns will change with the resulting negative impact on their economies are unfounded. The infrastructure required for receiving, processing, and shipping the large volumes of trawl

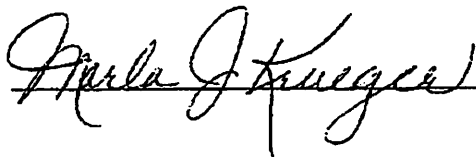
NPFMC  
Item C5 GOA Rationalization  
F/V Mar Del Norte  
Page #2

caught fish necessitate facilities located only in the major fishing ports in the Gulf of Alaska. Regionalization provisions in the rationalization program will insure that product will be delivered to traditional fisheries ports. It is my firm belief that the traditional fishing ports in the Gulf of Alaska will be major beneficiaries of the GOA rationalization program. Product will be delivered to the processors over longer periods of time allowing for increased recoveries when processing already established product forms. Slowing down the prosecution of these fisheries will also allow for the development of value added products being brought to market. The eventual outcome of rationalization will be to enhance the value of all fisheries in the GOA. The increased value of product being harvested and processed will have a direct and positive impact on the economies of the entire Gulf of Alaska, including fishing communities, processors, crewmembers and vessel owners.

The Council has been working for many years on this program. There have been thousands of hours of labor put into developing this program. Please do not let all of this labor be for nothing. Again, I ask that you please keep the rationalization program of the GOA fisheries moving forward as quickly as possible.

Respectfully,

  
\_\_\_\_\_

  
\_\_\_\_\_

Mark A. Vickstrom  
F/V Irene H  
PO Box 318, Kodiak, AK 99615  
Phone: 907-486-7622; Fax: 907-486-0418; Email: jlmonroe68@yahoo.com

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N.P.F.M.C.

Ms. Stephanie Madsen, Chair  
North Pacific Fishery Management Council

November 21, 2005

**C-5: Gulf of Alaska Groundfish Rationalization/need to rationalize the Pacific cod pot fleet**

Dear Ms. Madsen,

I am opposed to the rationalization of the GOA groundfish trawl sector separately from and in advance of rationalization of the GOA p. cod pot sector. I understand that representatives of the GOA groundfish trawl and processing sectors wish to convince the Council to develop and implement rationalization of the GOA groundfish trawl and processing sectors in advance of and on a faster time track than the development and implementation of rationalization for the GOA p. cod pot sector.

It has been obvious that rationalization has been clearly needed for many years in all GOA groundfish fisheries. It is important that the Council rationalize all GOA groundfish fisheries at the earliest possible moment. In many respects, the GOA p. cod pot fishery is in greater need of rationalization than the trawl fishery. However, rationalizing only one of the GOA p. cod sectors, while delaying and denying the benefits of rationalization to the other sectors, is very unwise, unjustified and inequitable. The GOA p. cod pot and trawl sectors have to be considered concurrently with each other.

I am an operator of and a partner in the F/V Irene H (83' LOA). I have fished for GOA p. cod with pots since approximately 1990. My partner and I were among the very early participants who developed this fishery. I have fished in Alaska for approximately 30 years. I am an Alaskan resident, with three sons and two daughters. I employ approximately 5 persons on my vessel. All of my crew have been almost entirely either Alaskan or Kodiak residents. Since I primarily fish GOA p. cod with pots, I will comment primarily on the need to rationalize the GOA p. cod pot fishery.

I have a long-standing participation, and a very significant fishing history, in the GOA p. cod pot fishery. My participation and history is currently recognized in the ongoing Council plan to rationalize GOA groundfish. My fishing history will represent very important fishing rights, and will permit me to participate in a rationalized GOA p. cod pot fishery. I have worked very hard, at great cost, and with a significant personal and financial investment and sacrifice, to earn my fishing history, and the anticipated rights to participate in this fishery, and to enjoy the benefits of rationalization. I have consistently supported rationalization of the GOA p. cod pot fishery. I have been frustrated with the many delays that have impeded rationalization of the GOA p. cod pot fishery, including the costly delay that was caused by the trawl and processing sectors when they convinced Congress to tell the Council how to go about their business by way of a Congressional mandate to the Council to focus their time and attention to the rationalization of the Central GOA rockfish fishery, and at the expense of the other fisheries that were then, and still are, in need of rationalization.

I am opposed to the exclusion of the p. cod pot fleet from GOA groundfish rationalization. I am opposed to rationalizing the trawl sector separately from the p. cod pot sector. Rationalization of the GOA trawl sector separately from the p. cod pot sector provides the trawl sector with the many advantages of rationalization, while placing the p. cod pot sector at a significant competitive disadvantage as compared to the trawl sector. The needs of the p. cod pot fleet should not be considered as less important than those of the trawl fleet. In fact, the p. cod pot sector probably has more reason to be rationalized ahead of the trawl fleet, especially since the trawl sector has already been able to benefit from Council and Congressional action to rationalize the CGOA rockfish fishery, and, in so doing, has taken more p. cod from the other users of the GOA p. cod resource than they needed to prosecute their rockfish fishery.

The GOA groundfish fisheries, and especially the p. cod trawl and pot fisheries, are closely associated in many ways, and have significant impact on each other. It is obvious that the same safety, marketing, economic stability, social stability, and efficiency factors and considerations that are used to justify rationalization in general, and rationalization of the GOA trawl fleet specifically, are equally and similarly present for the GOA p. cod pot fleet. Why would anyone consider that these factors are any more important for the trawl fleet than for the p. cod pot fleet, or provide preferential treatment to the trawl fleet, or treat the GOA pot fleet less equitably than the trawl fleet?

Addressing the development and implementation of a rationalization plan for the GOA p. cod pot fishery on a timetable that is

less beneficial than that for the trawl fishery will put the p. cod pot fleet at a disproportionately inferior position with respect to safety, economic and harvesting efficiency, and economic stability. An unrationalized race for fish in the p. cod pot fishery will put this fleet at a significant competitive disadvantage to the trawl fleet. Delay in the rationalization of the GOA p. cod pot fleet will mean that a very large number of GOA p. cod pot fishermen will stand to lose traditional economic standing, and stability in the GOA groundfish fishery, including their standing in many of the very important qualification criteria that are currently used as the basis of GOA groundfish rationalization. For example, recent participation is very important to the qualifications criteria of any rationalization plan, and a delay in rationalizing the p. cod pot fleet will mean that there will almost certainly be a shift in the qualification years that will be ultimately be used for rationalization of the p. cod pot fleet. This shift in the qualification years will cause my standing in the GOA groundfish fishery, and the standing of many other GOA p. cod pot fishermen, to be significantly diminished. Any delay in the rationalization of the p. cod pot fleet will almost certainly represent a direct economic loss to my fishing business, and to the economic stability and value of my fishing business; the same will occur to other p. cod pot fishing businesses that have established a traditional and economic dependence on the GOA p. cod pot fishery.

The GOA p. cod pot fleet does not want to be left in a race for fish; it needs to be rationalized as soon as possible, and it needs rationalization more than the trawl fleet. It is not wise or justified to delay the rationalization of any sector of the GOA groundfish fishery. If you wish to delay the rationalization of any sector or gear type, you should delay the development and implementation of rationalization for all sectors and gear types on the same schedule.

I respectfully request that you concurrently develop and implement rationalization of the p. cod pot fleet with the same dedication, on the same schedule, and at the same time, as you develop and implement rationalization of the trawl sector. The p. cod pot fleet should not be treated less equitably than the trawl fleet.

Respectfully,



Mark A. Vickstrom

**CITY OF HOMER**

Shadle

**HOMER, ALASKA**

**RESOLUTION 05-117**

A RESOLUTION OF THE CITY COUNCIL OF HOMER, ALASKA SUPPORTING INDEPENDENT FISHERMEN AND URGING THAT A THOROUGH ANALYSIS OF THE SOCIAL AND ECONOMIC IMPACTS OF EXCISING SHARE-BASED PROGRAMS IN ALASKA MUST OCCUR PRIOR TO FURTHER USE IN ALASKA ESPECIALLY PROCESSOR QUOTA.

WHEREAS the Homer City Council has an extensive history of supporting independent fishermen, sustainable fishery management and conservation; and

WHEREAS the Constitution of the State of Alaska provides, "fish...are reserved to the people for their common use" and legislation or rules should never be passed that would infringe or dilute the meaning, purpose or rights of that provision but should protect and provide equal opportunity for commercial fishermen to be independent now and into the future; and

WHEREAS the Bering Sea Aleutian Island Crab Individual Fishing Quota (IFQs) system that mandates fishermen by law to deliver their catch to specific processors who have Individual Processor Quota (IPQ) called the "two pie system" is in its first year of implementation; and

WHEREAS the "two pie system" has not resulted in safer working conditions for fishermen or higher prices paid for crab; and

WHEREAS the "two pie system" has resulted in hundreds of direct job losses in the fishing fleet, many of those jobs were based in Homer; and

WHEREAS the "two pie system" has adversely affected the Homer marine trades industry that did repair, equip and supply both the crew and vessels that had participated in the Bering Sea Aleutian Island crab fishery that were based in Homer; and

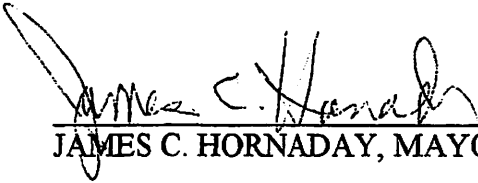
WHEREAS the North Pacific Fishery Management Council is currently developing regulations for the Gulf of Alaska groundfish that could link fishermen to processors similar to the "two pie system"; and

WHEREAS the Homer City Council supports an eighteen month postponement in any new Individual Fishing Quota (IFQs) system or similar programs either in federal or state managed fisheries until a full and thorough analysis of the social and economic impacts of excising share-based programs in Alaska, especially Individual Processor Quota (IPQs)

NOW THEREFORE BE IT BE RESOLVED by the City Council of Homer, Alaska that this resolution be sent to Governor Murkowski, Senator Ted Stevens, Senator Lisa Murkowski,

State Senator Gary Stevens, Representative Paul Seaton, members of the State House Special Committee on Fisheries, members of the North Pacific Fishery Management Council, Commissioner of Alaska Department of Fish and Game McKie Campbell, Alaska Department of Fish and Game Director of Commercial Fisheries Denby Lloyd.

CITY OF HOMER

  
\_\_\_\_\_  
JAMES C. HORNADAY, MAYOR

ATTEST:

  
\_\_\_\_\_  
MARY L. CALHOUN, CMC, CITY CLERK

Fiscal note: NA

**CITY OF KODIAK  
RESOLUTION NUMBER 05-45a**

**RECEIVED**  
NOV 23 2005  
N.P.F.M.C.

**A RESOLUTION OF THE CITY OF KODIAK, REQUESTING NORTH PACIFIC FISHERY MANAGEMENT COUNCIL CONSIDERATION OF COMMUNITY CONCERNS IN THE PENDING GULF OF ALASKA RATIONALIZATION PROGRAM**

WHEREAS, the harvesting and processing sectors of the Kodiak fishing community are substantially involved in and substantially dependent upon the Gulf of Alaska groundfish fisheries; and

WHEREAS, Kodiak's economic and social health is inherently dependent on the community's sustained participation in all aspects of the Gulf groundfish fisheries; and

WHEREAS, the City of Kodiak has made substantial investments in support of and in reliance upon the Gulf groundfish fishery, such as water system expansion and improvements and port and harbor expansion and improvements; and

WHEREAS, the North Pacific Fishery Management Council has developed a suite of fishery allocation alternatives for the Gulf of Alaska groundfish fisheries and is working toward adoption of a preferred alternative for implementation; and

WHEREAS, allocating exclusive harvesting and/or processing privileges promotes consolidation in the fishing fleet and the processing sector, which may improve efficiency, but also results in skippers, crew members, and processing workers bearing the costs of consolidation without fully sharing in the related benefits; and

WHEREAS, fishery rationalization may create opportunities and incentives to produce more and higher value products, it also changes the distribution of fishery revenues among participants by altering the balance of market power between fishermen and processors, with potentially disruptive effects on the communities in which they live; and

WHEREAS, by awarding harvesting and/or processing privileges, fishery allocations make possible orderly harvesting and processing, but also facilitate migration of landings to communities with infrastructure advantages (such as road system access) and create barriers to entry for later generations of fishery participants; and

WHEREAS, it is essential that the potential adverse affects of Gulf groundfish rationalization be identified and analyzed, and that program adjustments be made to mitigate the potential adverse effects of Gulf groundfish rationalization on Kodiak and its residents prior to implementation.

NOW, THEREFORE, BE IT RESOLVED, by the City Council of the City of Kodiak, Alaska, that the North Pacific Fishery Management Council (the Council) is hereby requested to take



the following actions in connection with its development of a Gulf of Alaska groundfish rationalization program:

1. Delay adoption of a ~~preferred alternative~~ **Gulf of Alaska rationalization program** until such time as the Council has conducted its 18- month review of the Bering Sea crab rationalization program to enable the public to evaluate and comment on the impacts of crab rationalization and to enable the Council to make appropriate adjustments to the Gulf rationalization program in response.
2. Preserve the catch history of vessels that are currently participating in the fishery, during the 18-month delay, to ensure that their interests are not diluted in any final allocation scheme that may be adopted.
3. Thoroughly analyze each alternative being considered by the Council before eliminating any of the alternatives to provide the public with the opportunity to compare the effects of the various alternatives on harvesters (including skippers and crew members), processors, and Gulf fishing communities.
4. Include limits on harvesting consolidation through vessel use caps that apply without exemption, and that are calculated to sustain skipper and crew employment opportunities and compensation.
5. Include measures to maintain a diverse, competitive processing market by providing a substantial pool of groundfish privileges for each sector that can be harvested without penalty and are not subject to processor linkage or processor closed class delivery requirements.
6. If processing privileges are included, limit consolidation of such privileges through processor and facility use caps.
7. Designate Federal harvesting privileges by region to reflect landing patterns similar to those occurring prior to program adoption, and require that fish harvested under such privileges be landed in their designated region.
8. Include a reasonable groundfish allocation that may be harvested and processed without holding any Federal or State dedicated access privilege, subject to restrictions that the State of Alaska may deem necessary to maintain the entry level character of such allocation.
9. Include a community fisheries quota program that
  - provides an opportunity for small Gulf coastal communities to enhance their residents' participation in the Gulf groundfish fishery, under the conditions that the allocation to such program does not disrupt other Gulf of Alaska fishery dependent communities by displacing their fishermen
  - is required to be harvested by residents of the eligible communities
  - requires that harvests made under such program be delivered on shore within the region of their allocation.

9. Include a community purchase program that provides Gulf coastal communities with the opportunity to maintain participation by their residents in the Gulf groundfish fishery by acquiring harvesting privileges for use by their residents, under the conditions that the City of Kodiak is an eligible community, and such program includes reasonable limits on the amount of harvesting privileges that any single eligible community may hold.
10. Consider, analyze, evaluate, and include all major sectors and gear types together, at the same time, and in combination with each other as an interconnected fishery, as the Council proceeds with the process of developing and implementing a rationalization regime for Gulf of Alaska groundfish.



CITY OF KODIAK

*Carolyn Floyd*

MAYOR

ATTEST:

*Delora Mauldin*

CITY CLERK

Adopted: November 17, 2005

Christine Holland  
Kenneth N. Holland Jr.  
F/V Point Omega  
PO Box 608, Kodiak, AK 99615  
Tel/fax 907-486-3764  
November 24, 2005

RECEIVED  
NOV 27 2005  
N.P.F.M.C.

Stephanie Madsen, Chair  
North Pacific Fishery Management Council

Dear Stephanie,

**Agenda Item C-5 (b): GOA Groundfish Rationalization/obligation to allocate federal parallel fishing history to the people who earned it**

My husband Ken and I own and operate the 72 ft F/V Point Omega. We live and work out of Kodiak. Ken has been fishing since 1963, and he is the primary operator of our vessel. Ken has been fishing pacific cod with pots since 1987, and he is one of the early pioneers in this fishery. We participate in the federal Gulf of Alaska p. cod pot sector. We, along with many other federal p. cod pot sector fishermen, have consistently supported federal rationalization of the p. cod pot sector.

We are concerned that the State of Alaska advocates a policy that intends to extinguish our right to fully receive, own, use and transfer our federal fishing history, and our right to benefit from the associated federal qualifications, fishing rights and fishing privileges that provide us with the opportunity to participate in a federally rationalized GOA p. cod pot fishery. We have earned our federal fishing history, and the associated federal qualifications, rights and privileges, during our many years of participation and qualification in the federal Gulf of Alaska p. cod pot fishery that occurred inside three miles, fishing on a federal p. cod TAC, during a federal p. cod season.

We are concerned that the State of Alaska advocates a policy that intends to influence the North Pacific Fishery Management Council to extinguish, and to deny the recognition of, our hard-earned federal GOA p. cod pot fishing history and qualifications for GOA groundfish rationalization, and also, to withhold from us the allocation of the associated fishing rights and privileges to participate in a federally rationalized GOA p. cod pot fishery. We are disappointed that the State of Alaska encourages the Council and the federal government to confiscate our fishing history, qualifications, rights and privileges, and, in turn, to re-allocate these to itself, the State of Alaska, rather than to us, and to many like us, who are the individuals who have earned these histories, qualifications, and rights and privileges through hard work, investment, sacrifice, significant risk to life and property, etc.

The State of Alaska did not earn our federal GOA p. cod pot fishing history, did not earn the qualifications for federal GOA groundfish rationalization that come with that federal history, and did not earn the federal fishing rights and privileges that provide us with the opportunity to participate in a federally rationalized GOA p. cod pot fishery. The State of Alaska has no moral or legitimate claim to our federal GOA p. cod pot history, or to our associated qualifications that make us eligible to receive the rights and privileges to participate in a federally rationalized GOA p. cod pot fishery.

We have earned approximately 95% of our federal GOA p. cod harvest history and qualifications to participate in a federally rationalized GOA p. cod pot fishery during the federal GOA p. cod pot fishery that occurred inside three miles, fishing on a federal p. cod TAC, during a federal p. cod season. We possessed the required Federal Fishing Permit and the required Federal License Limitation Permit for all the years that NMFS required that we carry these documents as a prerequisite to participate in the federal fishery for GOA p. cod with pots. Fishermen who harvested p. cod during the federal GOA p. cod pot fishery that occurred inside three miles, fishing on a federal p. cod TAC, during a federal p.

NPFMC GOA Groundfish Rationalization Agenda C-5 (b)  
November 26, 2005/Page 2 of 3

cod season, understood that they were participating in a federal fishery, and earning federal p. cod fishing history and qualifications that provided them with the rights and privileges to participate in some future federally rationalized p. cod pot fishery. Trawlers, longliners, pot fishermen, etc. began fishing on the federal GOA p. cod TAC when NMFS opened the GOA p. cod fishery, and we all had to stop fishing, wherever we fished, when NMFS closed the GOA p. cod fishery to comply with federal regulations that applied to the federal GOA p. cod TAC.

We anticipate that the Council and the federal government have no option but to recognize our federal p. cod pot fishing history and qualifications, and to allocate the same fishing rights and privileges to us that provide us with the same opportunity to participate in the same federally rationalized GOA groundfish fishery as you recognize and allocate to those fishermen who fished outside three miles during the same federal GOA p. cod fishery, fishing on the same federal p. cod TAC, during the same federal p. cod season.

We respectfully request that the Council and federal government do not submit to the State of Alaska desire for federal action to extinguish and expropriate our federal p. cod pot fishing history, or to deny us our earned and rightful qualification to fully receive, own, use or transfer any rights or privileges to participate in a federally rationalized GOA p. cod pot fishery.

We respectfully request that the Council and federal government do not establish discriminatory requirements and criteria that deny or extinguish the recognition of our federal GOA p. cod pot history and qualifications, and the associated rights and privileges to participate in a federally rationalized GOA p. cod pot fishery. We respectfully request that the Council and federal government do not establish discriminatory requirements and criteria that treat us inequitably, or differently, as compared to those federal requirements and criteria that govern the recognition of GOA p. cod history and qualifications for fishermen who have earned their history and qualifications by fishing outside of three miles during the same federal GOA p. cod fishery, fishing in the same federal p. cod TAC, during the same federal p. cod season.

Our federal GOA p. cod pot history and qualifications are a very significant factor to the success and survival of our fishing business, and to many independent small businesspersons like us. We, and many like us, have earned our federal histories and qualifications through a significant dedication over many years of hard work, the investment of personal energy and financial resources, financial and personal sacrifice, risk to life and property, etc. We anticipate that we, and many like us, will qualify for a significant allocation of federal rights and privileges to harvest GOA p. cod in a federally rationalized fishery under almost any qualification criteria that may be eventually adopted by the Council and the Secretary of Commerce for GOA Groundfish Rationalization. As a qualified federal groundfish fishery participant, we expect and desire to receive federal rights and privileges for the federal history and qualifications that meet the qualification criteria for GOA groundfish rationalization that we earned.

If the State of Alaska is successful in convincing the Council and federal government to allocate our fishing history, qualifications, and associated rights and privileges to the state, we will be unable to participate in a federally rationalized GOA p. cod fishery; therefore, we are out of business. What reason or rationale can support such a damaging, unreasonable and indefensible policy? There is no justification for the State of Alaska to attempt to engage the Council or the federal government in the confiscation of, or for the State of Alaska to claim, our federal GOA p. cod fishing history, or our qualifications to participate in a federally rationalized GOA p. cod fishery.

NPFMC GOA Groundfish Rationalization Agenda C-5 (b)  
November 26, 2005/Page 3 of 3

The State of Alaska does not have to claim, or attempt to convince the Council and federal government to expropriate or deny us, our fishing history, fishing qualifications, and the associated rights and privileges to participate in a federally rationalized GOA p. cod pot fishery. The State of Alaska could and should correctly back away from such an unreasonable and indefensible scheme that damages so many Alaska-resident and other small and independent businesspersons. We are long-time residents of Alaska. Our family's future, and our ability to continue to operate our fishing business in the GOA p. cod pot fishery is severely damaged by the position that has been put forth by the State of Alaska; and, there are many like us who are similarly situated. The State of Alaska does not have to work to deprive us, or to obstruct the just and rightful allocation, of our fishing history and fishing qualifications. It is enough that the State of Alaska has already taken 25 percent of the federal GOA p. cod TAC.

We respectfully request that the Council and federal government adopt the same alternatives, options, criteria and regulations that govern the recognition of our GOA p. cod federal history and qualifications, and the history and qualifications that have been earned by many who are similarly situated, as you do to govern the recognition of the GOA p. cod federal history and qualifications that have been by earned by fishermen who have fished outside of three miles during the same federal GOA p. cod fishery, fishing in the same federal p. cod TAC, during the same federal p. cod season.

We respectfully request that the Council and federal government adopt alternatives, options, criteria and regulations for GOA groundfish rationalization that fully recognize our federal p. cod pot fishing history and our federal qualifications that permit us to fully receive, own, use or transfer any rights or privileges that come with such federal history and qualifications to participate in a federally rationalized GOA p. cod pot fishery.

Thank you.

Sincerely

*Ken Holland*  
*Chris Holland*

Ken and Chris Holland

November 28, 2005

John Rotter, Captain  
William Gilbert, Owner  
F/V Alaska Dawn  
PO Box 405  
Sand Point, AK 99661

Ms. Stephanie Madsen, Chair  
North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

RECEIVED

NOV 29 2005

N.P.F.M.C.

Re: Agenda Item C-5 GOA Groundfish Rationalization

Dear Madam Chair:

I am writing to protest the designation of the FV Alaska Dawn as "*Subject to GOA groundfish directed fishery "sideboard" closures, not including Pacific cod closures.*" The FV Alaska Dawn catch history clearly proves that the boat is a long-term "true" GOA trawl catcher vessel and dependent on those fisheries. Opilio crab (BSS) fishing has been a minor part of our fishing plan for many years compared to GOA trawl fishing, and it will continue in that vein in the future. The FV Alaska Dawn consistently fishes pollock in the WGOA and the CGOA and p-cod in the WGOA, along with occasional participation in Adak and other Bering Sea p-cod fisheries. The FV Alaska Dawn receives so little allocation of Bering Sea Snow crab (BSS) that given a chance we would relinquish it if we could be exempt from GOA groundfish sideboards.

Under the BSS crab sideboard program we will be prohibited from fishing economically in the GOA. Since our major focus has been GOA groundfish trawling for many years, we fear that if this new sideboard program now limits us we will also lose our place in GOA groundfish rationalization as well. We are appealing the sideboard designation with NMFS at this time in hopes that we can at least fish this coming season while we pursue this matter at the NPFMC. When the NPFMC does take up BSAI crab issues we ask for your consideration of our situation. Until that time please also consider our plight in regards to GOA groundfish rationalization, which is our bread and butter.

I am attaching our appeal letter to NMFS on this sideboard issue.

Thank you for your consideration,

Sincerely,

  
John Rotter, Captain

  
William Gilbert, Owner

attachment

November 27, 2005

John Rotter, Captain  
William Gilbert, Owner  
F/V Alaska Dawn  
PO Box 405  
Sand Point, AK 99661

United States Department of Commerce  
National Oceanic and Atmospheric Administration  
National Marine Fisheries Service  
Po Box 21668  
Juneau, Ak 99802-1668

RECEIVED

NOV 29 2005

N.P.F.M.C.

Dear Sir or Madam:

We wish to protest the preliminary determination for a GOA directed groundfish sideboard endorsement restriction for the FV Alaska Dawn. Your letter dated November 4, 2005, indicated that the FV Alaska Dawn was "*Subject to GOA groundfish directed fishery "sideboard" closures, not including Pacific cod closures.*" We are now in receipt of a second letter dated November 16, 2005, in which you modifies your initial determination and now the FV Alaska Dawn is "*Subject to GOA groundfish directed fishery "sideboard" closures, including Pacific cod closures.*" We agreed initially that the FV Alaska Dawn should be Pacific cod exempt for the GOA, but we also felt that the vessel should be exempt for other groundfish as well. Now under the subsequent determination we are forced to protest vigorously.

The FV Alaska Dawn catch history clearly proves that the boat is a long-term "true" GOA trawl catcher vessel. Opilio crab (BSS) fishing has been a minor part of our fishing plan for many years compared to GOA trawl fishing, and it will continue in that vein in the future. The FV Alaska Dawn consistently fishes pollock in the WGOA and the CGOA and p-cod in the WGOA, along with occasional participation in Adak and other Bering Sea p-cod fisheries. The FV Alaska Dawn receives so little allocation of Bering Sea Snow crab (BSS) that given a chance we would relinquish it if we could be exempt from GOA groundfish sideboards.

The FV Alaska Dawn has been and continues to be a very competitive vessel in the GOA groundfish fisheries and has caught a high liner share for many years. Our business will be destroyed if we are somehow sideboarded to an aggregate share of p-cod and especially pollock that was primarily caught by pot boats during the 1996-2000 time period. If we should be subject to groundfish sideboards, we should be aggregated with vessels that operate like us. The only other boats that operate remotely like we do are a few AFA trawl catcher vessels with BSS crab history. The FV Alaska Dawn is exempt from the AFA sideboards because we relinquished our very minor allocation under the AFA program. We should be allowed the same opportunity under this program. If we cannot relinquish our BSS allocation, then we should be sideboarded in the GOA along

with other non-AFA trawl catcher vessels with small BSS allocations, like ourselves. We are not aware of any other vessel that will fit that description.


We are certain that quick review of this sideboard program and the associated vessel database will demonstrate that the FV Alaska Dawn is unique in that it is obviously a GOA dependent trawl catcher vessel. The other exempt boats are pot boats with some harvest history of GOA p-cod. The Alaska Dawn has very significant harvest of both p-cod and pollock in both the WGOA and the CGOA. If the FV Alaska Dawn is restricted to fishing to a share of the sideboard amounts of pollock caught in the CGOA and WGOA during the qualifying period 1995-2000, the vessel will likely be bankrupted. So little pollock was harvested in the CGOA by sideboarded vessels in this category during the qualifying years, that the sideboard fishery might not even be opened. Virtually all of the pollock caught during that time frame by the sideboarded fleet was apparently the result of pollock bycatch in directed p-cod pot fisheries. The sideboard allocation for CGOA pollock will be so small, that a directed fishery is absurd. Our participation during the years since 2000 as a GOA pollock trawler is very significant. If the GOA groundfish sideboards confine us, we will lose the mainstay fishery that we depend upon above any other.

GOA pollock and p-cod fishing is not a new fill in fishery for us. We have been totally involved for many years. If anything, Opilio fishing was a fill in. If we are forced out of our usual and accustomed fishery because of our relatively casual participation in Opilio fishing, this will be a travesty and a complete contradiction in the whole purpose of the sideboard program.

In conclusion, we vigorously protest your determination that the FV Alaska Dawn is subject to GOA groundfish sideboards. We protest on the grounds that we should be considered as a GOA groundfish dependent trawl catcher vessel. We request to be identified and if necessary, sideboarded, with other similar vessels. That group would be non-AFA, trawlers, with extensive GOA groundfish participation in both p-cod and pollock fisheries, in both the WGOA and the CGOA. The FV Alaska Dawn is not now and has never been primarily a pot-fishing vessel for GOA groundfish. This sideboard program is absolutely in error if it forces us into that designation.

Thank you for your consideration.

Sincerely,

  
John Rotter, Captain  
Owner

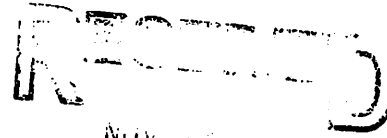
  
William Gilbert,



1 of 2 pages

November 29, 2005

Ms. Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2253



N.P.F.M.C.

Dear Madame Chair:

Attached please find a copy of my letter dated May 30, 2000 to your predecessor Richard Lauber. In that document I urged the Council to move forward with Agenda Item C-5 (Gulf of Alaska Groundfish Rationalization). I am including it as a reminder of how long we have waited for our opportunity for Council action. At this time I am once again urging the Council to move forward with item C-5.

My 58' EXCELLER has fished groundfish since 1987. While most of our landings were into our home port of Kodiak, we also made significant deliveries into Sand Point and Adak during portions of seven different years. That vessel has mainly employed trawl gear for cod and pollock, with some additional history using longline gear, and pot gear to catch cod. Our involvement in the flatfish and rockfish fisheries has mostly been limited to bycatch. Back in 1987, the trawl season rarely closed. The winter season in 2005 lasted less than one week. In my opinion, the present situation will never improve without rationalization.

2005 was the first year since 1987 that EXCELLER did not participate in the Alaska trawl fishery. After incurring a net operating loss from trawling the pervious year, I made a decision to not gear up for trawling this year. Since writing the Council in 2000, we have found it increasingly difficult to fish profitably as a small trawler considering skyrocketing operating costs and fewer fishing days. It should be noted that the only Alaskan fishery I did participate in during 2005 was IFQ halibut, where efficiency does offset the increased costs of operating a fishing boat.

I feel that I have a legitimate claim to the groundfish fishery in the Gulf based on tenure, landing history, and level of investment, but am struggling to access it under the present management system.

Any further delay by the Council in addressing this issue is unwarranted. At a minimum, the trawl sector should be allowed to proceed with rationalization. I believe the Council will be shown that a significant majority of trawl stakeholders support it.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Dan Macdonald', is written over a rectangular stamp.

Dan Macdonald  
201 Hawthorn Road  
Bellingham, WA 98225  
[dan@excellerfisheries.com](mailto:dan@excellerfisheries.com)

2 of 2 pages

May 30, 2000

Mr. Richard Lauber, Chairman  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2253  
Sent via telefax to 907-271-2817

RECEIVED

NOV 29 2000

N.P.F.M.C.

Re: Agenda items C-5

Dear Mr. Lauber:

My name is Dan Macdonald. I have owned the 58' fishing vessel EXCELLER since 1985.

In 1987, I was recruited by a Kodiak processor to convert my boat to become a groundfish trawler, and it has since that time participated continuously in the groundfish fisheries.

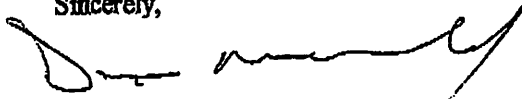
I am writing you today to express my support for Comprehensive Rationalization in GOA groundfish. You should know that I have not been an advocate for Co-ops or IFQ's until recently, however, recent events have demonstrated to me the immediate urgency for regulatory change. Those events include;

- the Sea Lion problem which could close down the fisheries upon which I depend.
- Changes in the Bering Sea (AFA) have allowed trawl vessels to enter the Gulf fisheries when they would previously have been fishing in the Bering Sea.
- Moving the Opilio season back to April also allowed a number of large, efficient, pot vessels to enter the GOA cod fishery and contributed to a shortened season for the boats like mine who have historically depended upon this fishery.

It is time for the Council to move to protect the interests of the Gulf of Alaska. Boats that have a history in groundfish have a right to continue to fish, and those who recently jumped into our fisheries should not. Proposals are circulating around which would include almost everyone who has delivered fish in any year including this year (vessels under 60'), or in any two years (vessels over 60'). Such a plan would not recognize the effort of boats like mine that invested and gambled in groundfish when processors needed the support of a local small boat fleet to keep the plants going at a time when crab stocks were dwindling, and groundfish ex-vessel prices were low.

Therefore, I urge the Council to immediately adopt a Co-op or IFQ program using the years 1995-1999, and allow participants to pick their *three* best years during that period. This would be the most equitable way to include the boats that have a legitimate claim to the fisheries, and not over-inflate the quota share pool with the speculators who have only recently rushed in.

Sincerely,



Dan Macdonald

Christine Holland  
Kenneth N. Holland Jr.  
F/V Point Omega  
PO Box 608, Kodiak, AK 99615  
tel/fax 907-486-3764

RECEIVED

NOV 29 2005

N.P.F.M.C.

November 28, 2005

Stephanie Madsen, Chair  
North Pacific Fishery Management Council

Agenda Item C-5 (b): GOA Groundfish Rationalization/need to rationalize the GOA Pacific cod pot sector, and at the same time as the trawl sector

Dear Stephanie,

My husband Ken and I own and operate the 72 ft F/V Point Omega. We live and work out of Kodiak. Ken has been fishing since 1963, and he is the primary operator of our vessel. Ken has been fishing pacific cod with pots since 1987, and he is one of the early pioneers in this fishery. We participate in the federal Gulf of Alaska p. cod pot sector. We, along with many other federal p. cod pot sector fishermen, have consistently supported federal rationalization of the p. cod pot sector.

During the recent October meeting of the North Pacific Fishery Management Council, we were disappointed and surprised to hear some individuals advocate for the development and implementation of rationalization for the Gulf of Alaska groundfish trawl sector separately from rationalization of the other GOA groundfish sectors.

We object to further rationalization of the trawl sector separately from other sectors of the GOA groundfish fishery. Specifically, we object to rationalizing the GOA trawl sector separate from the GOA p. cod pot sector. It is important that the plan to rationalize the GOA groundfish fishery include all sectors, and that any plan for GOA groundfish rationalization proceed jointly for all sectors, and on the same development and implementation schedule.

It has been very apparent for many years that rationalization of all sectors of the GOA groundfish fishery is needed (with the possible exception of the jig fishery). From our way of thinking, the GOA p. cod pot fishery is more in need of rationalization than the trawl fishery. It is important for the Council to remember that the trawl sector recently went around the Council and convinced the U.S. Congress to mandate the Council to rationalize the Central GOA trawl rockfish fishery. This mandate caused the Council to further delay rationalization of the other sectors and species of the GOA groundfish fishery, including our p. cod pot fishery. Now, the trawl fishery wants to drop the non-trawl sectors from the rationalization process, so that they can proceed again with promoting only their own benefits and best interest, and again, at the expense of the other sectors.

It is very evident that all sectors of the GOA groundfish fishery should be rationalized together. It is important that the Council develop a rationalization program for all GOA groundfish sectors simultaneously. It is essential that the Council continues with a combined and concurrent analysis of catch data, and of the comparative, interrelated, and interconnected costs, benefits and impacts of rationalization of all GOA groundfish sectors. It would be unwise and imprudent for the Council to analyze the data, and the costs, benefits and impacts of rationalization for the trawl p. cod fishery separately, and on a more rigorous time line, from the p. cod pot fishery. It is important for the stability and competitiveness of each GOA groundfish sector that rationalization of all GOA groundfish species and sectors be implemented at the same time. It would be very damaging to the competitiveness and stability of the p. cod pot sector if the Council were to proceed with the development and implementation of a rationalization program for the trawl fishery on a faster timeline than for the p. cod pot sector. This approach would undermine the underlying and long term stability and competitiveness of the p. cod pot sector, and of the significant number of Alaska resident and other fishermen who have made significant investments in, and who are and have been greatly dependent upon, the p. cod pot fishery.

Leaving the p. cod pot fishery in a race for fish is economically damaging to the p. cod pot sector. We want to get on with the rationalization of our sector. However, if the Council not only leaves the p. cod pot fleet in a

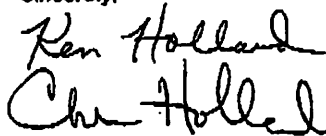
Stephanie Madsen, NPFMC Chair  
GOA Groundfish Rationalization Agenda C-5 (b)  
November 28, 2005/Page 2 of 2

race for fish, but also proceeds with rationalization of the GOA trawl fishery separately and on a faster track than for the pot fishery, it is obvious that you will put the p. cod pot fishery at a serious competitive disadvantage as compared to the trawl fishery, and you will significantly compound the negative impacts that you will impose upon us by leaving us in a race for fish. Also, any delay in the rationalization of the GOA p. cod pot fleet will almost certainly mean that the qualifying years for rationalization of the p. cod fleet will change. Therefore, we, and many other p. cod pot fishermen who currently qualify under the current qualification years for p. cod pot rationalization, will lose their relative position in any future rationalization program as compared to other harvesters who have entered the fishery in recent years, and who may have less history, economic dependence and longevity in the fishery. If you delay rationalization of the p. cod pot fishery, and if you devote your attention and energy largely for the benefit of the trawl fishery, we, and many others like us, will stand to lose important and traditional comparative economic standing in the GOA p. cod pot and groundfish fishery. If the Council delays rationalization of the GOA p. cod pot fishery, and if you treat the trawl fishery preferentially, we, and many other GOA p. cod pot fishermen, are almost certain to incur a direct economic loss to the stability and value of our fishing operation.

We have previously written to you explaining how our ability to participate in the GOA p. cod fishery will be significantly damaged by State of Alaska efforts to pre-empt and confiscate our federal fishing history and fishing rights that we have earned while harvesting p. cod from the federal Total Allowable Catch inside three miles during the federal fishery for p. cod. In the past, the State of Alaska has implemented rules that put boats of our size at an economic disadvantage. The current State of Alaska effort to expropriate our personal federal p. cod fishing history and associated fishing rights, and that of many other Alaska resident and other p. cod pot fishermen who are similarly situated, will damage our ability to survive as small Alaskan business persons. Our ability to competitively and successfully participate in the GOA p. cod fishery will similarly be disadvantaged and damaged if the Council drops or otherwise delays the p. cod pot fishery from being rationalized at the same time, and on the same time schedule, as the trawl fishery.

We respectfully request that the Council analyze, develop and implement a rationalization program for the p. cod pot fishery on the same schedule as for the trawl fishery. Specifically, as GOA p. cod pot fishermen, we want rationalization of our sector as soon as possible. We wish to be included in the ongoing analysis, development and implementation of federal GOA groundfish rationalization together with all other sectors, and on the same time line. We feel that rationalization of all GOA groundfish sectors needs to proceed together for the best and most reasonable outcome. We are longtime residents of Alaska, and our family's future and business survival is going to be forever damaged if you proceed with rationalization of the trawl fleet separately from the p. cod pot fleet.

Sincerely,



Ken and Chris Holland

**Alaska Peninsula Coastal Fisherman's Association**

Sand Point, Alaska 99661 postmaster@apcfa.org

www.apcfa.org

Ms. Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 West 4th Ave., Suite 306  
Anchorage, AK 99501

November 23, 2005

RECEIVED  
NOV 29 2005  
N.P.F.M.C.

Dear Ms. Madsen:

The Alaska Peninsula Coastal Fisherman's Association represents the working fishermen of the Alaska Peninsula coastal villages. In this letter we would like the opportunity to share our view on the topic C-5, Alaska Gulf Rationalization.

The 18-month stand down for Gulf Rationalization of Ground fish by the two Kodiak governments (Borough and City) is an excellent avenue to take, and APCFA **supports** their resolutions for this stand down. Making rash and quick management plans for Alaska's fish resources isn't practical and wise.


As the Gulf Rationalization plan unfolds in written form today, APCFA concludes it will only benefit the processing corporations and vessel owners. Both, the processing corporations in Alaska, of which are mostly foreign owned, and the boat owners, most of whom didn't even catch the ground fish in the qualifying years of this management plan are trying to **steal** the ground fish resources in the Gulf of Alaska from Alaska and its people.

The negative impacts from the discussions and debates around the waterfront in Alaska about the newly implemented crab rationalization management plan do have truth and merit. One issue is the safety of the Bering Sea crab fishery, the lobbyist for this plan used safety as a tool to push the Bering Sea Crab Rationalization plan thru Congress, but the bottom line is, the boats fished in just as nasty and worse weather this year, than they did in any year previous. Here is an example of why safety was a **smoke screen** in this plan, if the processor the vessel delivered to in the past is in Kodiak and you are partway thru a trip, the weather gets nasty, with winds gusting and seas building, do you think the crab skipper is going to run his crab back to Kodiak and wait for the weather to abate, or will he/she keep fishing, crabs only live so long in the tanks of vessels before they start to die. I bet in a situation like that the captain has nothing but good things to say about the council and processor quota shares the council gave blessings to. With the price of diesel fuel high this year, not many boats will have stopped and ran for cover when the weather came up.

With the above example, APCFA feels like Alaska's coastal fishermen are crying on deaf ears, **listen**. APCFA represents local Alaskan fishermen and these fishermen hope the fish resources of Alaska will be for all to profit from, not a select few.

Sincerely,

Edgar L. Smith  
Dale Pedersen

  
Alaska Peninsula Coastal Fisherman's Association



# Polar Star, Inc.

Patrick J. Pikus, President

P.O. Box 2843

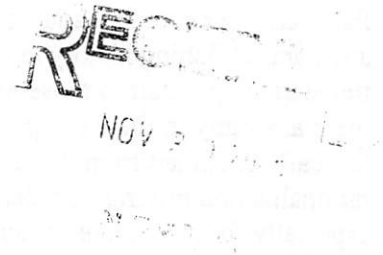
Kodiak, AK 99615

907-486-5258 Fax: 907-486-5413

pikus@ptialaska.net

November 30, 2005

Ms. Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 W 4<sup>th</sup> Ave., Suite 306  
Anchorage, AK 99501



RE: Agenda item C-5, GOA groundfish rationalization.

Dear Chair Madsen:

I own and operate two vessels, the F/V Polar Star and the F/V Miss Lori, both under 58 feet in length, that participate in the federal Gulf of Alaska Pacific cod pot fishery. I have lived in Kodiak and fished in the GOA waters for over 30 years now, and I have developed a significant history in the federal p-cod fishery that is important to my livelihood. I am very concerned about recent developments in the North Pacific Fishery Management Council's efforts to rationalize the GOA groundfish fisheries. In particular, it has become apparent to me that, in an effort to expedite the process, the council may exclude the fixed-gear sector from the federal rationalization program and turn much of their federal history over to the State of Alaska. I would like to raise two issues with you concerning these developments.

*All of the participating sectors should be rationalized at the same time.* It has become apparent to me that there may be an effort to exclude the fixed-gear sector from GOA groundfish rationalization and treat it separately from the other sectors at a later time. This strikes me as being patently unfair to those of us in the fixed-gear sector. Such an act would put us at a great disadvantage with regard to our fishing competitiveness, economic viability, and safety, since we would be left in a race for fish while everyone else would have all of the benefits that accrue from rationalization. The fixed-gear fleet needs rationalization just as much as the other sectors. Also, putting us on a separate timetable would likely result in the use of a shifted set of qualifying years for determining allocations, which would diminish the hard-earned history of many long-time participants. I recognize that there are many difficult issues to resolve when rationalizing such a diverse group of fishermen, but treating the fixed-gear sector differently and on a separate timetable for the sake of hastening rationalization for the other sectors is unjust and unreasonable. I urge the council to not take this step and recognize that all of the sectors need to be rationalized together on the same timetable.

Polar Star, Inc.

Page 2

***Parallel fishing history should be credited under the federal GOA groundfish rationalization program.*** The State of Alaska is currently maintaining the position that the fishing history of groundfish caught within state waters during the federal fishery (the parallel fishery) belongs to the state. I believe that this position is wrong. When I was fishing for p-cod it was my understanding that I was fishing in the federal fishery, with the quota coming off of the federal TAC. When the LLP program was instituted I then fished under that federal license. This was not a State of Alaska fishery; it was a *federal* fishery. During this federal fishery I was permitted to fish in both state and federal waters, so I concentrated my fishing effort according to where the fish were concentrated, and I did not consider the arbitrary 3 nm line. The state now argues that any parallel fishing history must be allocated under a state-managed program. This is tremendously unfair to those of us who worked hard to gain that federal history, and, indeed, there are many in the fixed-gear sector who could lose nearly all of their federal history and be basically excluded from the federal rationalization program entirely. Also, having two separate rationalization programs, federal and state, would greatly complicate the p-cod fishery, especially for those, like myself, who would receive both federal and state allocations. There would have to be two separate fisheries, forcing us to change our historical fishing times and practices. We would have to deal with two different management regimes and two different co-op arrangements. There are some who argue that forcing the fixed-gear fleet to fish outside 3 nm would create an undue hardship; I do not believe that this is the case for the vast majority of the fixed-gear fleet. The development of SB113 and the dedicated access program (DAP) is lagging far behind the NPFMC process, potentially forcing the council to exclude the fixed-gear sector from the primary rationalization program and treat it on a separate, delayed timetable, an issue I addressed above. Thus, as a matter of fairness and practicability, I believe that the Council should recognize the rights of parallel fishers to their hard-earned federal history and keep that history within the federal GOA groundfish rationalization program.

To conclude, I would like to make one philosophical point. In any sweeping change to fisheries management, such as GOA groundfish rationalization, it must be a central principle that all of the fishery sectors be treated equally. In both of the issues I addressed above, the fixed-gear sector seems to be treated differently. In the first case we would be excluded from the main rationalization program and put on a different timetable, and in the second many in the fixed-gear sector would have their federal fishing history taken from them and be forced to fish in two separate fisheries. I ask you to consider this when deliberating on these issues. A reasonable and just conclusion is that the fixed gear sector should be included in the main federal rationalization program and be granted our federal parallel history.

Thank you for your consideration.

Sincerely,



Patrick J. Pikus



Thorvold L. Olsen  
F/V Viking Star  
PO Box 322, Kodiak, AK 99615  
voice: 907-486-5387, fax: 907-486-8126  
November 29, 2005

RECEIVED  
NOV 30 2005  
N.P.F.M.C.

Ms. Stephanie Madsen, Chairperson  
North Pacific Fishery Management Council

Agenda Item C-5 (b): GOA Groundfish Rationalization

\*award my GOA p. cod fishing history to me, and the right to participate in a rationalized federal GOA groundfish fishery;

\*recognize the need to rationalize all GOA groundfish sectors and species at the same time

Dean Ms. Madsen,

I am a veteran, and a life-long Alaskan. I have been fishing in Alaska for 51 years. Commercial fishing is 100% of my income. My entire crew are local residents.

I have been fishing p. cod with pots and longline since 1986. I own and operate the 58' F/V Viking Star (pot/longline/seine). I am part owner of the 78' F/V Enterprise (dragger/pot vessel). Both vessels have earned a large percentage of their federal Gulf of Alaska p. cod pot harvest history while participating inside three miles during the race for the federal GOA p. cod quota. Approximately 90% of my GOA federal p. cod harvest history with the F/V Viking Star was earned from inside of three miles while participating in the race to catch the federal p. cod quota during the federal GOA p. cod fishery. I have been required to have a federal fishing permit and an LLP for as long as they have been required in regulation. I also kept a federal GOA logbook when they were required for vessels under 60'.

The Council and the Secretary of Commerce must recognize that I, not the state of Alaska, am the rightful recipient and beneficiary of the federal fishing rights and privileges for which I qualify as a result of my federal GOA p. cod fishing history, and that allow me to participate in a federal GOA groundfish rationalization program. I object to the attempt by the state of Alaska to confiscate my federal GOA p. cod history from me. I also object to their attempt to extinguish and confiscate my fishing rights, and my qualification to participate in a rationalized federal GOA p. cod fishery. I respectfully request the Council and the Secretary of Commerce to treat me fairly and equitably, and the same way that you treat any other fishermen who earned their federal GOA p. cod fishing history, and their associated qualification for GOA groundfish rationalization, while participating in the race to catch the federal p. cod quota during the federal p. cod season. Many fishermen who earned their GOA federal p. cod history from inside of three miles while participating in the race to catch the federal p. cod quota during the federal p. cod fishery are Alaska resident small business persons, and own and operate Kodiak/Alaskan-sized vessels (45'-100'). Why would the state of Alaska ask the Council and the Secretary of Commerce to put me and so many of these Alaska resident fishermen-owned businesses in a position of

such certain financial harm and damage, and of certain competitive disadvantage as compared to other fishermen? The state of Alaska has no claim to any of my history, to the fishing rights that come from that history, to my qualification to participate in a rationalized federal GOA p. cod fishery, or to how I should receive, use or transfer the fishing rights and privileges that come from my history and qualification.

I deserve to benefit from and receive federal fishing rights for 100% of my federal GOA p. cod history that I earned while fishing inside of three miles in the race to catch the federal p. cod TAC during the federal p. cod fishery. I deserve to qualify for participation and fishing privileges in a rationalized federal GOA p. cod fishery. I deserve to be treated just like any fisherman who will benefit from and receive federal fishing rights for the GOA p. cod history that they earned while fishing outside of three miles on the federal p. cod TAC during the federal p. cod fishery.

For the record, I am willing to fish outside of three miles for the amount of p. cod for which I qualify in the federally rationalized GOA p. cod fishery.

On another issue, I object to the rationalization of the GOA trawl sector on a faster time schedule than the GOA p. cod pot sector. I respectfully request the Council to not leave the GOA p. cod pot sector in a race for fish, while you only rationalize the trawl sector. This will cause significantly more destabilization for my fishing operation, and for the many others like me, who are already facing destabilizing conditions in the GOA p. cod pot fishery. The GOA p. cod pot fleet is in need of rationalization, and must become a rationalized fishery at the same time as the trawl fleet. Further delay in the implementation of rationalization for the GOA p. cod pot sector will seriously diminish my relative standing with respect to the set of qualification years that will be used for rationalization. Delay in the implementation of rationalization for the GOA p. cod pot sector as compared to the time line for implementation of rationalization for the GOA groundfish trawl sector will negatively impact my competitive position, and the competitive position of the entire p. cod pot and longline fleet, as compared to the trawl sector. Also, it is important that the design of any rationalization program for GOA groundfish should be based upon a comprehensive analysis that simultaneously measures, recognizes, incorporates and balances the interrelated characteristics, impacts and effects of all GOA groundfish sectors, together. Also, the trawl fleet has already received preferential treatment, benefits and advantages as compared to the other sectors when they convinced Congress to instruct the Council to rationalize only the trawl rockfish sector. This trawl sector initiative significantly delayed the progress of comprehensive groundfish rationalization for the other GOA groundfish sectors, provided economic benefits and stability only to the trawl sector, and imposed costs on these other sectors, including the p. cod pot fleet.

Sincerely,

  
Thorvold L. Olsen

November 30, 2005  
North Pacific Fisheries Council

REC  
NOV 30 2005  
N.P.F.C.

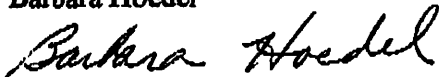
Attention: Stephanie Madsen:

I am writing concerning Agenda Item C5.

I am requesting that you stand down on any decisions on gulf rationalization for at least 18 months until after the review of the crab rationalization can be completed. This includes not narrowing any of your options or choosing preferred options at this time. I believe that the fisherman involved in the fishery should be allowed to vote on any changes that are made.

The crab rationalization has had adverse effects on the economy of my business, many personal friends and the community of Kodiak. There are three businesses closing before the first of the year and another may have to close if the economic situation in Kodiak does not improve.

Sincerely,  
Barbara Hoedel



Sutliff Hardware  
Box 1157  
Kodiak, Alaska 99615  
907-486-5797

Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave., Suite 306  
Anchorage, AK 99501-7252

November 30, 2005

RECEIVED  
NOV 30 2005  
M. P. F. M. C.

Re: Agenda Item C-5 Gulf of Alaska Groundfish Rationalization

To the Members of the NPFMC,

My name is Joe Cornelious and I have lived and commercial fished out of Kodiak since 1978. I am thoroughly interested in this community, having invested in a home and raising two kids here with my wife. My income is derived 100% from commercial fishing.

Kodiak is a delicate economy and cannot withstand another round of consolidation. Coastal communities rely on commercial fishing to maintain their existence. We need to step back and monitor the effects of crab rationalization before consideration of implementing another program. Put Gulf rationalization on hold for 18 months or more.

What will happen to our property values with increased consolidation? It is known that the rural communities in British Columbia had a 40-45% decline in property value of the twenty years that their coast has been rationalized. This has also led to the inability to buy quotas, as there was no value in their house to borrow against.

Quite honestly, we're a town running scared. Our future lies in the hands of a select group of Council members. Take all the information you can into mind and consider the families that live by the docks before moving forward with this. My vote is against Gulf Rationalization.

Thank you very much,

Joe Cornelious



December 2005

Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 West 4th Ave., Suite 306  
Anchorage, AK 99501-2252

RECEIVED  
NOV 30 2005  
NPFMC

Re: Agenda Item C-5 Gulf Of Alaska Groundfish Rationalization

Dear Members Of the NPFMC,

My name is Tim Filburn and I came to Kodiak in 1982 to work as a mechanic. Like most in this town, I also commercial fished for a number of years participating in halibut, shrimp, salmon, Dungeness crab and trawling for multiple species of groundfish. Deciding to start a family, I left the fishing industry but chose to remain in Kodiak as it is a great place to live and raise children. I now work for the City of Kodiak and own Emerald Island Suites Bed and Breakfast. Since coming to Kodiak I have heard numerous stories of doom and gloom that always sounded like rhetoric. I'm an optimist and viewed such sentiments as exaggerative. But now, living in the midst of Crab Rationalization and with another similar program in the works, I don't see how this town can survive. I have many friends that are out of work as the crab fleet consolidated and the impacts are only beginning to trickle through our town.

Let me share with you some of what I am seeing. The rental market has tripled since this time last year making it next to impossible to rent our suite for the winter as we have done in the past. In the downtown shopping district one local business has closed its doors and two others are contemplating doing the same. My wife, who works at a restaurant downtown has seen a sharp decline in tips as have the rest of employees in various establishments. The young crab dockhands are not coming back to town and spending money as in years past.

I wonder how this obvious drain in revenue will effect our home and business. As people move out of town those who remain will bare the cost of maintaining the infrastructure of Kodiak. As it stands we need new water lines, the high school needs extensive repairs and a new swimming pool is in the works. Our property taxes will increase to pay for these services while our property values decline. We have already seen the big winners in the halibut/sablefish program move out of town, taking their quota with them. We're a close knit community and it is a well known fact these folks are gone. We take the loss while they see the gain. In summary, the effects of rationalization are proving to be devastating to the community of Kodiak; place an 18 month hold on pursuing Gulf Rationalization and conduct an economic and social impact study on effected coastal communities.

Sincerely, Tim Filburn

*Tim Filburn*

Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 west 4th Ave., Suite 306  
Anchorage, Alaska 99501-2252

RECEIVED  
NOV 30 2005  
N.P.F.M.C.

Re. Agenda Item C-5 Gulf of Alaska Groundfish Rationalization

To the Members of the NPFMC

My name is Peggy Smith, I moved to Kodiak in 1971. I have fished King Crab in Kodiak and the Bering Sea. I have fished Halibut, Salmon and was a dragger for pollock on the FV Sea Wolf. I became a mother in 1988 so this ended my Fisherman occupation. Now I am a Teamster truck driver, I've worked for a construction company and now a freight company.

I love raising my children in Kodiak, clean air, clean water, hardly any crime, and great seafood. But I see all of this changing, esp. with crab rationalization. I've seen jobs fishermen had for years gone and now a large majority of these fishermen had to move out of Kodiak because there are no jobs and they and their family can not survive here. I've watched the construction jobs go down. Of course our road to the rocket launch site provided us with jobs last summer but when that is completed next year we will once again have a lower than average construction year. Once we had freight all year long now it is only during fishing seasons, so that leaves alot of time with no work.

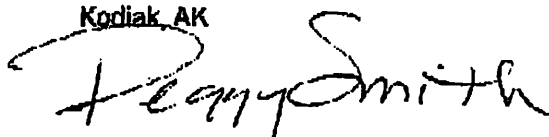
I see the big money out of Alaska controlling our resource and big money telling our councils what to do and so far they have done it. Please think about the people in the small fishing towns and see the devastation this rationalization is causing. Without fishermen we have no town, we will have no Coast Guard and we will have no future for our children. Please vote against Gulf Rationalization, for my children's sake. Consider the people that live in Kodiak, not the rich that live in Washington and Oregon.

Thank you,

Peggy Smith

P.O.Box 1863

Kodiak, AK



11/30/2005

North Pacific Fisheries Council  
Attn: Stephanie Madsen

REC-10  
NOV 30 2005  
N.P.F.C.

I am writing to request that the council pause on any further decisions on gulf rationalization. I urge you to take no steps that will tend to narrow any future options that the council might have in this regard. At the very least, a thorough review of the effects of the recently implemented crab rationalization should be completed first.

I have been in the retail marine business in Kodiak for 35 years. I have never seen any new fisheries regulations have the immediate negative impact that crab rationalization has. It has negatively and seriously impacted local businesses, displaced long time Kodiak fishermen and will, over time, reduce the quality of life in all small Alaskan communities that depend on fisheries to drive their economy. Further rationalization will worsen the effects.

I urge you to move cautiously and seek the input of our local fishing community. Your decisions will have serious consequences for families and communities.

Sincerely,



Donald E. Zimmerman.  
President, Sutliff Hardware, Inc.

F/V PACIFIC STAR ~ PACSTAR, INC.  
F/V LAURA ~ LAURA FISHERIES, J.V.

November 30, 2005

Ms. Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave., Suite 306  
Anchorage, AK 99501-2253

RECEIVED  
NOV 30 2005  
N.P.F.M.C.

VIA FACSIMILE: 907-271-2817

RE: Item C-5

Dear Madame Chair:

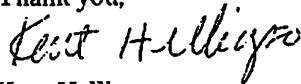
I am Kent Helligso, owner and part time operator of the F/V Pacific Star which fishes for ground fish in the central Gulf of Alaska and halibut and black cod. Since 1983 I have been involved as an owner/operator in the ground fishing in the Gulf of Alaska delivering our entire product to shore based processors in Kodiak. Ours is a family owned operation with our oldest daughter and our son involved from a young age. My family is also part owner of the F/V Laura which fishes in the GOA. Between the two boats we have eight full time crew, some of which have been with us for more than ten years.

You have heard from other Kodiak based trawler owners and operators on the benefits of rationalization providing longer fishing time allowing us to work around salmon and crab seasons, that presently conflict with trawl fishing opening dates, while providing the processing work force in the community of Kodiak year-round work.

But to me the biggest beneficiary of rationalization will be to the resource we fish. There would be less regulated discards. Everything that is caught in the tow will be going toward the fishing quota and brought to the community to be processed. I for one am tired of discarding fish under our present system.

Please do not delay gulf rationalization. NMFS and staff have worked on GOA rationalization since 1998. Please support all this work, testimony and analysis and move forward with item C-5.

Thank you,



Kent Helligso  
Owner

1672 MONASHKA CIRCLE • KODIAK, AK • 99615  
PHONE: 907-486-6380 • FAX: 907-486-7062  
EMAIL: helligso@ak.net



Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Ave, Suite 306  
Anchorage, Ak., 99501-2252  
Fax 907 271-2817

RECEIVED  
NOV 30 2005  
NPFMC

Re: Agenda Item C-5 Gulf of Alaska Groundfish Rationalization

Dear Members of NPFMC,

My name is Julie Miller. I have been a longliner in Alaska since 1986. Fishing has been my sole source of income since then. I am writing to voice my opinion against Gulf Rationalization in its current form if not completely.

The Council knew what the outcome of halibut/sablefish IFQs would be. New Zealand, and the East Coast Quahog fishery already had been implemented IFQs with DISASTEROUS results. You did it anyway. Your measures to address their downfalls were inherently flawed and they failed, and you knew that would happen too. Because they can be bought and sold, you have made a few people obscenely rich, the majority who don't live near the water or ever go out on it. You have robbed thousands of their livelihood by allowing consolidation. Where there once may have been an excess of boats chasing the fish, now there is an excess of money. Fishing can no longer buy your way into the fishing business, literally only millionaires can afford to buy enough to support themselves. And even if you wanted to just be a deckhand, you can't—no jobs.

You caused this to happen with halibut and sablefish, you let it happen again with crab, and now you are poised to sin again.

Unless EVERY pound fished has its owner onboard, IFQs are an easy money maker and therefore worth more and more as an investment. Why do you think they cost so much?

Unless you keep processor quota/linkage out of it, they will strangle us with Walmart prices for our fish. Look ANYWHERE else to see this processor domination. The only reason we get what we do for halibut and sablefish at the dock is the competitive market. Buy off their dang stranded capital, I wish someone would have bought off mine.

Sure something needs to happen, just like it did in the halibut derby days. TAKE A GOOD LOOK AT THE ALTERNATIVES. Don't give away something that wasn't yours to give away in the first place. So far the decisions made by the council in this regard haven't been made for the sake of the resource or for the majority of fishermen who have fished their whole careers, but for a handful of folks that YOU appear to be answering to.

Do the right thing. Take you time here. You owe it to the disenfranchised future generations.

Thank You,

Julie Miller  
614 Hillside St  
Kodiak, Ak 99615

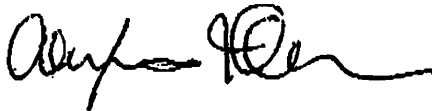
Nov. 30 2005

North Pacific Fisheries Management Council,

The position of the Gulf Groundfish Fishermens Association is:

- (1) Crew and Skipper provisions must be put in all of the elements and options. No plan should move forward without Skipper and Crew protections in place. For us to be a trailing amendment is absurd.
- (2) Social and economic impact studies must be done. The plans should be better for everyone not just a few. Coastal Alaska communities depend on a healthy working waterfront, if the Councils plan eliminates 30-60% of the Gulfs working boats the effects on our communities will be devastating!
- (3) Please review the effects of the crab plan for 18 months before you move forward in the Gulf. If the Council moves forward after that, your ability to protect all of the fishing community will be much greater from the lessons learned.
- (4) No one sector should be split off and moved forward for rationalization. For instance if the trawl sector moved forward and the fixed gear stayed derby style, you will create the same economic disparities that exist between AFA and the gulf, only this will be created between gear types. One for all and all for one!!!

Sincerely,  
Alexus Kwachka



RECEIVED  
NOV 30 2005  
N.P.F.M.C.

Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup>, Suite 306  
Anchorage, AK 99501-2252  
FAX: (907) 271-2817  
PF: (907) 271-2809

RECEIVED  
NOV 29 2005

November 29, 2005  
Re: Agenda Item C-5 Gulf of Alaska Groundfish Rationalization

Dear Members of the NPFMC,

We are writing as members of the Kodiak Fishing Community, currently salmon fishers holding a set gillnet and two beachseine permits. In the past we have been involved with a variety of Kodiak fisheries including Tanner, red king crab, and Dungeness crab fisheries, flatfish trawling, cucumber and urchin dive fisheries, and halibut longline, and in the Bering Sea, Pollock, cod, and yellow fin sole trawl fisheries. Fishing has contributed significantly to our incomes over the years and open access has made this possible. We have nothing to gain by privatization of the Gulf of Alaska (GOA); in fact, we will lose potential future access to resources in our backyard.

We are especially concerned that the NPFMC would consider linking processors or giving processors any shares in the GOA fisheries as we have seen the power of the dominant cannery at play in Kodiak salmon giving us the lowest prices in the State for our fish. We do not want them to control the fisheries and the prices any more than they have the past few years. It is only in the last two years, when an outside processor has dared to enter the Kodiak salmon market that we have begun to see our market share return. This new cannery can make it since no one is dictating where we deliver. If you rationalize the GOA we fear the spillover effect of cannery control into the salmon fishery.


We are also just plain against the privatization of the public resource in any form and prefer Alternative 1, the status quo. We especially do not want to see corporations and foreign entities controlling our natural resources. Your Alternatives 2 and 3 lean heavily in favor of this possibility.

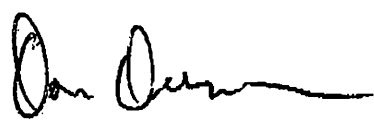
Your Problem Statement concerning GOA Rationalization strikes us as a list of contrived problems that could be solved in other ways. Reduced economic viability and instability of communities and harvestors will be the result as evidenced in the halibut/sablefish IFQ and the Bering Sea Rationalization programs. By linking processors especially with trawlers you will be institutionalizing a dirty fishery and waste, not solving the bycatch issues of those fisheries. This strikes us as not seeking to achieve your National Standards guidelines of Optimum Yield (OY), "providing the greatest overall benefit to the Nation" for GOA groundfish fisheries. The negative impacts of bycatch, and the economic and social impacts will greatly reduce OY.

National Standards mandate that you gather all scientific information in adopting a Fishery Management Plan. Scientific information, by definition, includes social and economic data. You therefore need to carefully study the impacts of your recent Rationalization efforts in the Bering Sea crab and the halibut/blackcod longline fisheries on the communities and all fishers (owners, captains, crew) for the drastic consequences and make this information available to the public for further comment before proceeding with the GOA Rationalization Plan. If necessary, you may also have to reconsider the FMP for the Bering Sea as drastic consequences did occur in that Rationalization plan in the disruption to communities' social and economic viability.

Can you honestly justify the consequences of Rationalization?

Sincerely,

  
Susan Payne and Don Duzin  
PO Box 1903  
Kodiak, AK 99615



Cc: This letter will be forwarded to public officials.

November 30, 2005

Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2252  
Fax: (907) 271-2817


We are writing to address three concerns we have on GOA ground fish rationalization.

First, we would like to speak about our Federal P-Cod history. We have a substantial amount of our catch history inside three nautical miles. We are requesting that this council include our landings caught on Federal TAC in the Federal Rationalization plan. We consider ourselves federal fishers during our operations using federal TAC and believe we are justified in this request. The State of Alaska has no clear options for the management of it's existing quota or for any additional quota. The State will be constrained by it's constitution and cannot offer its fishers a plan similar to the federal plan. IT is not clear what the State's final objective will be. Therefore, we respectfully request inclusion of our entire Federal catch history in the Federal Rationalization plan.

Secondly, we would ask that the council recognize the grave consequences of moving any individual gear type forward toward Rationalization, without the entire ground fish Fleet. If the council were to rationalize only a portion of its ground fishers—then it would not be responding to its problem statement. Rationalizing only a portion of GOA ground fishers would compound the race for fish within other groups...we have seen this happen between other areas. As one area is rationalized, the next is anticipating quota shares and works to build history. Rationalizing a portion of the Gulf would cause discord within the fishery, similar to what we've seen happen in the AFA Pollock and Gulf Pollock fisheries. There would be little to no safety enhancement and partial Rationalization would only create a more complex-dual system of management.

Finally, we believe that a true community protection program would protect skipper and crews that have shown historical dependence and continued reliance on the resource, not the gifting of the fishery to an entity or community. We are against any plan that allows foreign ownership or linkage of an United States public resource.

Ron & Julie Kavanaugh

  
F/V Sylvia Star, LLC  
P.O. Box 3890  
Kodiak, AK 99615  
(907) 486-5061

Norman Mullan Fisheries, Inc.  
Norman Mullan, Owner/Operator  
F/V Cindria Gene  
Box 92, Kodiak, AK 99615

Telephone: 907-486-5012; Fax: 907-486-6048; email: njmullan@alaska.com  
November 29, 2005

NOV 30 2005

NOV 29 2005

Ms. Stephanie Madsen, Chair  
North Pacific Fishery Management Council

Agenda Item C-5 (b): GOA Groundfish Rationalization/objection to rationalizing the trawl sector in advance of the p. cod pot sector

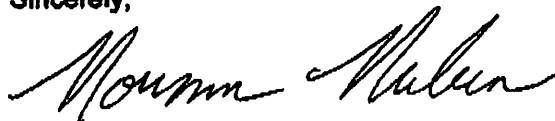
Dear Ms. Madsen,

I am a Gulf of Alaska pacific cod pot fisherman. I support rationalization of the GOA p. cod pot fishery. I support developing, analyzing and implementing rationalization of all the GOA groundfish sectors at the same time. I am opposed to rationalizing the Gulf of Alaska trawl sector on a faster track than the GOA pot sector. As a p. cod pot fisherman, I am opposed to rationalizing the p. cod trawl fishery separately from the p. cod pot fishery.

While all the GOA groundfish fisheries are interdependent and impose impacts and costs on each other, the GOA p. cod fishery clearly demonstrates that the various sectors impact one another in a manner that is best addressed through rationalization of all p. cod sectors at the same time. Rationalizing the p. cod trawl sector in advance of the p. cod pot sector puts the pot sector at a competitive and economic disadvantage as compared to the trawl sector, and triggers an increasing level of instability for the pot sector that exceeds the existing but increasing instability that is seen as a result of the current race for fish that exists in the pot sector. The inter-sector economic stability impacts should be solved for the respective sectors at the same time. While pure politics may influence the Council to provide further preferential treatment to the trawl sector, reason and analysis do not support that approach.

If the Council is influenced to not recognize, consider or address the interdependence and interrelationship of all the GOA groundfish sectors, or at least of the p. cod sectors, but rather wishes to rationalize one sector on a faster track than the other sectors, I respectfully suggest that the Council chose the GOA p. cod pot sector for rationalization ahead of the other sectors. If any sector is a likely candidate to be rationalized separately from the other GOA groundfish sectors, and on an expedited time frame, it is the GOA p. cod pot sector. The GOA p. cod pot sector is a clean and low impact fishery, especially when compared to the GOA trawl fisheries. It produces a high quality product, and has minimal complications with respect to bycatch, discards, and its impact on other fisheries, other species, habitat, etc.

Sincerely,



Norman Mullan

11/29/2005

Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

REC-11-D  
NOV 30 2005  
N.P.F.M.C.

**RE: Agenda Item C-5 - GOA Rationalization**

**Dear Members of the NPFMC:**

**My name is Diane VanMatre and I live in Kodiak, Alaska. My husband, Stan VanMatre, has been a commercial fisherman for the last 21 years, working primarily as a deckhand on Alaska based trawlers. Out of concern, for job security in a rapidly changing industry, we recently purchased a 48 foot salmon boat to be used for jigging and long lining as well as salmon seining during the summer. Without the opportunity to fish multi species such as Pacific cod and rockfish, it would be next to impossible to eke out an existence on salmon alone.**

**My husband is 49 years old, and has chosen fishing for his career as well as a life style. Without substantial entry level opportunity, we would stand to lose access to the ground fish fisheries, which is an integral part of our survival in this coastal community.**

**Are we to be the sacrificial lambs in these programs, or will our needs be considered? As a new vessel owner, we have little or no history in the Gulf of Alaska fishery, and yet we have worked and lived around the Alaska fishing industry for the last twenty years. If rationalization becomes a reality, our coastal community will not be able to sustain itself without raising property taxes, etc. making it impossible to live in the town and community that we have invested in and cherish.**

**Perhaps the saddest part of this whole scenario would be that our teenage sons would not be able to commercial fish on their own vessel if they so desire. Probably wouldn't be able to get a crewmember job, for that matter. We've already witnessed our rich neighbor, who is a vessel owner with lots of IFQ's, sell his house and move out of state not contributing anything to our town, but still reaping the benefits of our Alaska waters. Sound like sour grapes? You bet it does!**

**Since we can't afford to attend the upcoming meeting, I am faxing this letter to you with the hope that your Council will take into consideration the life style and livelihoods of the people that make this State a great place to live and work.**

Sincerely,

*Diane VanMatre*  
Diane VanMatre

NOV 30 2005

Ms Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Ak. 99501-2253

N.P.F.M.C.

**Re: Agenda Item C-5 Gulf of Alaska Groundfish Rationalization**

Dear Madame Chair,

We, the undersigned are Gulf of Alaska groundfish trawl fishermen and believe that our sector needs to be rationalized. Since 1998 our numbers have shrunk from 170 to just 77 in 2004. During that same time period the gross exvessel receipts have shrunk by 50%. We are the only gear type that can efficiently catch pollock, rockfish, and flatfish. Our catch keeps the fish plants in Kodiak and the Alaska Peninsula viable enough to stay open year round.

We compete with trawl fisheries that will soon all be rationalized from the Bering Sea to British Columbia, and the West Coast. They have big operational and economic efficiencies over us. While we are forced to continue the "race for fish", they have the ability to slow down and do things more efficiently.

We feel that a cooperative management structure in our sector is vital to the long-term survival and viability of our industry and of Gulf of Alaska coastal communities.

Therefore we ask you to support the trawl sector in our effort to move forward immediately with establishing rationalized co-ops for all Gulf of Alaska groundfish species.

Respectfully submitted by.

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Mike Lancey	<i>[Signature]</i>	Ocean Hope 3	US Marine Corp.
2.	Mike Lancey	<i>[Signature]</i>	Green Hope	US Marine Corp.
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				

RE

NOV 30 2005

RECEIVED

To:

Stephanie Madsen Chair  
North Pacific Fisheries Management Council

Gulf of Alaska Groundfish Rationalization Item C-5 being debated at your December meeting is of particular interest to me. A resident of Kodiak Island for 26 years and a fisherman for 25 years. I have seen changes in fishery stocks, management and allocation come over the rail.

In light of the recent implementation of B.S.A.I. Crab Rationalization and job loss to skippers and crew. Coastal communities like Kodiak have taken a big hit. We also took big hits with Halibut - Sable fish rationalization and AFA pollock.

It is time to apply the brakes to Gulf of Alaska Groundfish rationalization. Take an 18 month breather and perform an economic analysis. Gulf communities and their residents need to fully understand rationalization and know all the options.

A concerned fisherman  
Harvey Goodell  
Kodiak AK.



December 2005

Stephanie Madsen, Chair  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Ave., Suite 306  
Anchorage, AK 99501-2252

REC-110  
NOV 30 2005  
REC-110

Re: Agenda Item C-5, Gulf of Alaska Groundfish Rationalization

Dear Members of the Council,

On behalf of my family and myself I would like to thank you for the opportunity to submit this written testimony for the record of this December hearing on Gulf Groundfish Rationalization.

My name is Kevin Thomet. I've been an active commercial fisherman for 22 years. I've crabbed, trawled, seined, longlined, jigged, dived, and gillnetted. Currently, I crew on a longliner and own a Kodiak salmon setnet site, which my wife and I operate. I've followed and participated in the rationalized fisheries and tried to stay abreast of Gulf Groundfish Rationalization process.

Frankly, I don't like the direction the council is going. The ~~harm~~<sup>threat</sup> to our coastal communities through massive fleet consolidation and the inevitable job loss associated with this will be great. I'm afraid the harm to the working fisherman and the communities where they reside will far outweigh the potential benefits to a select few.

If you, as a council, are going to continue privatizing our public resource, at what I perceive as an enormous cost to our fishing towns, please consider the following.

- A) Owner on board provisions to protect our communities from fishing rights migrating out of town.
- B) Include skipper and crew provisions in alternative #3.
- C) Put limits with some teeth in them on quota leasing.
- D) Do away with noncompetitive processor linkages, quota shares or limits on new processors entering the industry. We need free markets!
- E) If you are going to have processor linkages, consider a sector split, exempting all gear types besides trawl.

Please take these in serious consideration.

Thank you for your time.  
KEVIN M. THOMET

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NOV 30 2005  
ALDEN

**A Nickel in Time dba Normans**

414 Marine Way  
Kodiak, AK 99615  
907-486-3315  
FAX 907-486-4117


To the North Pacific Fisheries Council  
Re: Agenda Item 5  
Attn. Stephanic Madsen

Please stand down on making any decisions on Gulf Rationalization for at least 18 months. A thorough review of the Crab Rationalization and its many problems should be your first priority. Our town is suffering at all levels due to the turmoil of misplaced workers, un-fair catch prices, and monopoly on deliveries by non-local processors.

As an owner of a retail business, I can only hope that these mistakes can be fixed. Two neighboring businesses are closing their doors before Christmas. Our local economy has been hit hard over the last few years and this is just one more hardship we have to weather.

Please do not narrow your options by choosing the "preferred options" at this time.

Thank you for your time.

  
Kelly Bennett

**F/V Gold Rush Fisheries, LLC**  
25195 SW Parkway Avenue, Suite 111  
Wilsonville, OR 97070  
(503) 570-8899 phone  
(503) 570-8896 fax

P. O. Box 425  
Kodiak, AK 99615

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NOV 30 2005  
MDEB/C

November 29, 2005

Stephanie Madsen  
605 W. 4<sup>th</sup>. Avenue, Suite 306  
Anchorage, AK 99501-2252

**RE: GOA RATIONALIZATION**

Dear Ms. Madsen,

I operate the Trawler F/V Gold Rush in the Bering Sea and the Gulf of Alaska, from its homeport in Kodiak, Alaska. I have been fishing for 30 years, Bering Sea and Kodiak since 1980, and dragging with the Gold Rush since 1987. I bought out my partners in 2001, at which time I became owner/operator of the Gold Rush.

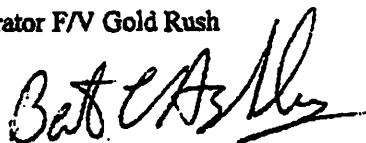
GOA Rationalization is critical to our continued successful operation of this vessel and our ability to meet new challenges ahead.

GOA Rationalization enables us to be truly effective and proactive managers over our operations. The efficiencies realized through rationalization positively affect our ability to operate on economic (insurance & fuel), time utilization, safety and environmental levels. These benefits extend a positive effect into the communities we cooperate with.

We continue to be committed to our communities in which we operate, and wish you the best of luck in finalizing this rationalization process.

Sincerely,

Bert Ashley  
Owner/Operator F/V Gold Rush



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NOV 30 2005

FIV MaKa (907) 654-0144

11-28-05

North Pacific Fishery Management Council  
RE: C-5 GOA groundfish rationalization

Good day,

I am writing to express my heartfelt opposition to groundfish rationalization in the GOA. I have fished commercially out of Kodiak for over 22 years, participating in pot, longline, trawl and jig operations for GOA groundfish. Over the years I have witnessed and experienced firsthand the detrimental effects of rationalization (halibut/sablefish and Bering sea crab) on employment opportunities and overall economy of Kodiak. At present, I make almost all of my yearly income from harvesting GOA groundfish/rockfish with my 39' vessel. I believe that a rationalization plan will marginalize me, as much of my GOA groundfishing history derives from crewing or from skippering other vessels than my own. I fear that any access privileges or quota shares allocated to me in the advent of GOA rationalization will not adequately reflect or recognize my commitment to my career or to my home town of Kodiak, which I will have to leave in search of better opportunity if I can no longer maintain a reasonable income or lifestyle harvesting GOA groundfish with my vessel. Furthermore, I am chagrined that the rationalization concept leaves little access opportunity for the upcoming generation, the younger fishermen that should be. I would much prefer that the current GOA groundfish management system be retained to as much a degree as possible, perhaps implementing such tools as limited entry or trip limits to avoid overfishing, reduce excessive fleet buildup, enhance fleet safety, and improve product value. Thank you for considering my views.

Cordially  
Dariusz Kasprzak  
Kodiak

Ms. Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4th Suite 306  
Anchorage, Alaska 99501

RECEIVED

NOV 2 2005

Dear Ms Madsen:

N.P.F.M.C.

Re: Item C-5 GOA Groundfish Rationalization

My name is Ron Thompson. My family and I own and operate the 58 ft F/V Northern Jaeger out of Kodiak. I have been fishing Kodiak since 1973 and have participated in the Federal Parallel Pot Cod fishery since 1990. I feel like I'm slowly getting kicked out of the fisheries. I fished the Kodiak tanner crab for 17 years and because I didn't fish when it was uneconomical and was fishing cod I didn't qualify for the new Kodiak limited entry permit. Some people who never fished Kodiak fished in 2000 & 2001 and got permits. How fair was that? I'm putting my kids through collage. My 2 girls have been my Salmon tender crew for 13 years. We have been losing income just like salmon fisherman but (salmon tenders) didn't qualify for Trade Adjustment Assistance. I'm just looking for some fair treatment.

**Confiscation of GOA groundfish pot cod private fishing history and fishing rights by the State of Alaska.**

We will qualify for the allocation of fishing history and fishing rights under GOA Groundfish Rationalization. GOA pot cod fishing is a very important component of our fishing history and fishing business. We have earned our fishing history and our fishing rights during the federal Central GOA pot fishery for the federal Total Allowable Catch for pot cod that takes place in the parallel fishery inside three miles. It is very important that the GOA parallel cod pot fishery is included in any GOA Groundfish Rationalization initiative. I will be agreeable to fish it outside of 3nm.

**Preferential treatment for GOA trawl and processing sectors at the expense of the Central Gulf of Alaska pot cod fleet.**

I am aware from observations and discussions, and from statements made by representatives of the State of Alaska at the last Council meeting in October, 2005, that the State of Alaska may be advocating and leading an initiative that advances a GOA Groundfish Rationalization initiative for the trawl and processing sectors only, and that drops the pot, hook-and-line and other fixed gear from continued forward movement and progress on GOA Groundfish Rationalization.

I have fishing history and fishing rights in the GOA pot cod fishery. I recognize that the management and operational needs of the GOA pot cod fishery clearly warrant rationalization of this fishery. I want to be rationalized as a GOA cod pot harvester at the same time, and according to the same planning, development and implementation schedule, as any other sector and gear type that is under consideration for the GOA Groundfish Rationalization initiative. I believe it is wrong for the Council to initiate action that rationalizes only part of the GOA groundfish sectors, and not all sectors at the same time.

Sincerely,

*Ronald G Thompson*

Ronald G Thompson

541 268 4016

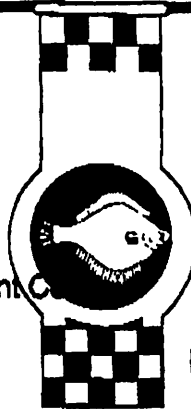
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907 486 5366

## F/V HAZEL LORRAINE

202 Center Street  
Suite 315-274  
Kodiak, AK 99615

Ms Stephanie Madsen  
North Pacific Fishery Management  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK. 99501-2253



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NOV 29 2005

Tel: 907-486-7599

N.P.F.M.C.

November 28, 2005

Re: Move Forward Now, Item C-5 Gulf of Alaska Groundfish Rationalization


Dear Madame Chair,

The City of Kodiak wants the Council to wait 18 months before acting on GOA rationalization; reviewing the affects that rationalization of the crab fishery has on the GOA and applying the learned lessons to what will happen to the groundfish fishery. **This idea should be rejected flat out!** First, the community based trawl fleet has not undergone a buyout and there are no stacked permits. Second, under rationalization groundfish could return to a 10-11 month a year fishery from less than 8 months, to take best advantage of certain markets. Comparing a 7-day red king crab fishery and the tanner crab fishery in the Bering Sea to the magnitude of groundfish fishery for the economies of Kodiak, Sand Point, and King Cove in the GOA is absurd! Community based trawlers under the current system have to compete with Factory Trawlers and unfair start dates with Factory Longliners and other user groups for resource and by-catch. These 8-9-10 months long "race" for fish is what we are seeking to end for multiple reasons crew/vessel safety, increased productivity, lower bycatch, stable economic environment for crews, vessels, and the communities.

In addition this does not speak to the possiblilty of "stacked" crab boats with LLP's fishing federal waters cod this January in the GOA, further impacting a fishery that once lasted 10 months for the trawl fleet.

The NPFMC and staff have worked on GOA rationalization since 1998; please support the work, testimony, and analysis that has gone before and supported by the trawl segment of the Alaskan fisheries. Move forward on item C-5.

Respectfully,

  
Albert Geiser

42277 Garrison Lake Road  
Port Orford, Oregon 97465

cc: Al Burch, Alaska Draggers

Subject: LETTER to SAVE TRAWL FLEET – Sign and pass out or write your own

**Ms Stephanie Madsen**

**North Pacific Fishery Management Council**

99501-2253

**RECEIVED**  
NOV 29 2005  
N.P.F.M.C.

**Gulf of Alaska Groundfish Rationalization**

Dear Madame Chair,

We, the undersigned are Gulf of Alaska groundfish trawl fishermen and believe that our sector needs to be rationalized. Since 1998 our numbers have shrunk from 170 to just 77 in 2004. During that same time period the gross exvessel receipts have shrunk by 50%. We are the only gear type that can efficiently catch pollock, rockfish, and flatfish. Our catch keeps the fish plants in Kodiak and the Alaska Peninsula viable enough to stay open year round.

We compete with trawl fisheries that will soon all be rationalized from the Bering Sea to British Columbia, and the West Coast. They have big operational and economic efficiencies over us. While we are forced to continue the "race for fish", they have the ability to slow down and do things more efficiently.

We feel that a cooperative management structure in our sector is vital to the long-term survival and viability of our industry and of Gulf of Alaska coastal communities.

Therefore we ask you to support the trawl sector in our effort to move forward immediately with establishing rationalized co-ops for all Gulf of Alaska groundfish species.

Respectfully submitted by,

WAYNE A TIPLER  
Wayne A Tipler

CAPT. F.V. MAR  
PACIFICO

Name - Print

Name - Signature

Vessel name



# MARAUDER CORPORATION

3421 Harborview Dr.  
P.O. Box 272  
Gig Harbor, WA 98335

Phone  
~~206-858-2955~~  
Fax  
206-858-5982

**RECEIVED**  
NOV 29 2005  
N.P.F.M.C.

November 29, 2005

Stephanie Madsen  
North Pacific Fishery Management Council  
605 W 4th Avenue, Suite 306  
Anchorage, Alaska 99501

Re: Agenda Item C-5 Gulf of Alaska Groundfish Rationalization

Dear Madam Chair,

My name is Robert Puratich and together with my brother Joseph we have operated our 58' trawler Marauder in the Western and Central Gulf for the past fourteen years for pollock and cod.

We have seen steady declines over the years in vessel and crew safety as well as economic stability for owners, crews, and communities.

We eagerly hope that rationalization for the Gulf will go forward and are asking for your support in establishing co-ops for Gulf groundfish.

Respectfully,

Robert Puratich



P.O. Box 2284  
Kodiak, Alaska 99615  
November 30, 2005

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NOV 30 2005  
MADSEN

Ms. Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Suite 308  
Anchorage, Alaska 99501

Dear Ms Madsen:

Re: Item C-5 GOA Groundfish Rationalization

My husband and I own the 53-ft F/V Lisa Gayle. We have been fishing since 1967, and have been fishing Pacific cod in the Federal Parallel Pot cod Groundfishery since 1991.

**Confiscation of GOA Groundfish pot cod private fishing history and fishing rights by the State of Alaska.**

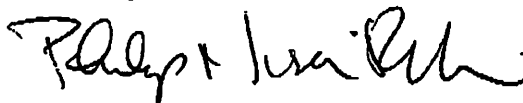
We will qualify for the allocation of significant fishing history and fishing rights under GOA Groundfish Rationalization. GOA pot cod fishing is a very important component of our fishing history and fishing business. We have earned our fishing history and our fishing rights during the federal Central GOA pot fishery for the federal Total Allowable Catch for pot cod that takes place in the parallel fishery inside three miles. It is very important that the GOA parallel cod pot fishery is included in any GOA Groundfish Rationalization initiative. We will be happy to fish it outside of 3nm.

**Preferential treatment for GOA trawl and processing sectors at the expense of the Central Gulf of Alaska pot cod fleet.**

We are aware from observations and discussions, and from statements made by representatives of the State of Alaska at the last Council meeting in October, 2005, that the State of Alaska may be advocating and leading an initiative that advances a GOA Groundfish Rationalization initiative for the trawl and processing sectors only, and that drops the pot gear from continued forward movement and progress on GOA Groundfish Rationalization.

We have valuable and significant fishing history and fishing rights in the GOA pot cod fishery. I recognize that the management and operational needs of the CGOA pot cod fishery clearly warrant rationalization of this fishery. We want to be rationalized as a GOA cod pot harvester at the same time, and according to the same planning, development and implementation schedule, as any other sector and gear type that is under consideration for the GOA Groundfish Rationalization initiative. We believe it is wrong for the Council to initiate action that rationalizes only the trawl and processing sectors, and does not rationalize the cod pot fishery at the same time.

Sincerely,



Philip and Lisa Robbins

November 30, 2005  
North Pacific Fisheries Council

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NOV 30 2005

ALBANY

Attention: Stephanie Madsen:

We are requesting that you stand down on any decisions on gulf rationalization for at least 18 months until after the review of the crab rationalization can be completed. This includes not narrowing any of your options or choosing preferred options at this time. We would also like to have all fishermen with LLP licenses vote on any changes in the ground fish fisheries.

The crab rationalization has had adverse effects on the economy of my businesses, many of my friends and the community of Kodiak.

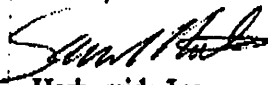
Time is needed to evaluate what has happened and consider the best way to go forward with the input of those directly affected.

Sincerely,

Doreece Mutch



Sam Mutch



Harborside Inc.  
210 Shelikof  
Kodiak, Alaska 99615  
907-486-4888

**RECEIVED**  
NOV 30 2005

To Stepine Madson chairman

Agend file c-5 gulf Alaska ground fish rationalazation

**N.P.F.M.C.**

Im writing to voice my opposition to the different rationalization plans. Surely in your economic report although very long in pages, didn't predict what happened in the bering sea, lower price to the fisherman , higher price to the consumer,extreme loss of jobs and consolidation. In the gulf rat plans you are scraficing to many jobs and coastal community destruction for the benefit of so few people . You have seen the reports of what has happened in New Zealand , Canada and now the Bering Sea. Stop going in the direction your heading, Your rat options are obviously made up from the few people who stand to get something, take into consideration the larger number of people who are going to lose, When do the common people and communities get to count in this process? Reduce bycatch by some % each year, don't just let people transfer it around to other fisheries, what good are you doing if you don't lower the bycatch from what it is now? Give preference and incentives to enviermentaly and bycatch friendly fisheries. The gulf cod quota is being fished by pots now and not reaching the quota, how much slower can a fishery get? You've spent all these years coming up with this rat plan working only in one direction. No other options have even been tried. No pot limits, no net limits , no poundage limit, no bycatch limits except halibut , yet you are willing to try something a radical as rat on us. Use some common sense here. I'd venture to say there are far more people agasinsts rat than for it KODIAK ,HOMER, KING COVE etc. I'm very interested to see what the majority of peoples effect is on this council. Thanks for allowing me to express my opinion.

Pete Hannah owner of a dragger,longline, pot boat and working fisherman  
27 yrs.

Ms. Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2253

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NOV 30 2005

N.P.F.M.C.

**Re: Agenda Item C-5 Gulf of Alaska Rationalization**

Dear Madame Chair,

Hello, my name is Ron Naughton, I am 45 years old, and I am the skipper of the trawl vessel Hazel Lorraine. The Hazel Lorraine fishes the GOA and BS Pollock. I was born and raised in Kodiak and I have been fishing since I was 16. I began my fishing career as a salmon seiner crewman and then at 24 I began to run a salmon seiner. I also crab fished in the winter months until I started trawling in 1989.

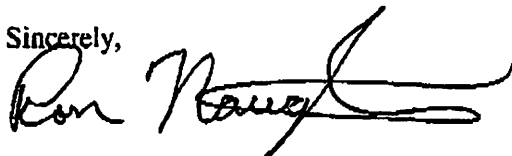
The reason I became a trawler is because of falling salmon prices caused by the flood of farmed fish into the world marketplace. After high school I began crab fishing but crab fishing by this time had become very hit or miss around Kodiak and then it became nonexistent for a while. Consequently I started trawling because it provided a far more steady income for my family and me.

I do not support the City of Kodiak's resolution to wait 18 months before acting on GOA rationalization. When I first started trawling, we started on January 20<sup>th</sup> and fished well into December, and quit because of the holidays. Now with the displaced salmon and crab vessels taking more of the cod quota, our seasons are getting shorter and shorter. We were only able to fish six days of cod in the GOA "A" season this year. Many of the GOA trawl vessels are economically forced to fish shallow water flats at times that result in a high bycatch, further reducing fishing time and leaving quota in the water. Quota that not only provides income for fishermen but income for the communities where they are landed also.

Another equally if not even bigger reason to move forward with GOA rationalization is the continuing and growing competition from aquaculture. I have read numerous articles in the United Fishermans Association's newsletter concerning fish farms. The Canadians are growing sablefish, the Norwegians are growing halibut and codfish, and our own federal government is beginning to advocate aquaculture. I strongly believe that if we do not begin to harvest fish in a manner that allows us to produce the highest quality product we will be fighting the same battle the salmon fleet is. With the current method of "catch as much as you can as fast as you can" quality is usually the first casualty. Do we really need to learn the wild salmon vs. farmed salmon lessons all over again? I sincerely hope not.

I urge you to move forward with GOA rationalization in a manner that benefits the fishermen and communities of the Gulf of Alaska.

Sincerely,



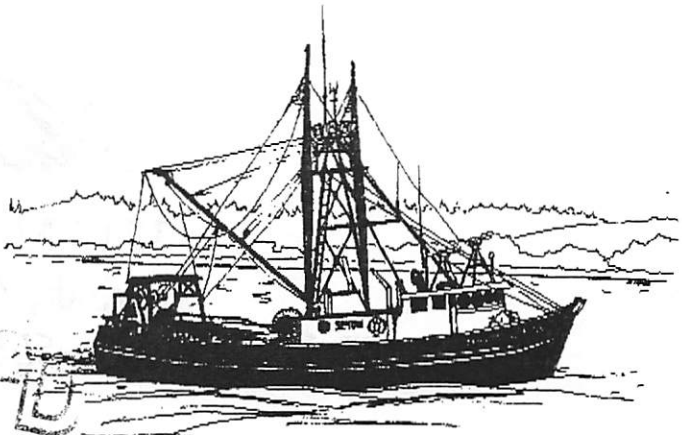
Ron Naughton  
P.O. Box 3210  
Kodiak, AK 99615

**Mar Pacifico, Inc. c/o**  
**F/V Mar Pacifico**

P. O. Box J  
South Bend, Washington 98586  
(360) 875-5672

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NOV 30 2005

N.P.F.M.C.



November 30, 2005

Dear Ms. Stephanie Madsen:

Reference: Gulf of Alaska Groundfish Revitalization

We own and operate vessels in the Gulf of Alaska Groundfish trawl and believe that our sector needs to be rationalized. Since 1998 our numbers have been decreased from 170 to just 77 in 2004. During that same time period the gross vessel receipts have decreased by 50%. We are the only gear type that can efficiently catch Pollock, rockfish and flatfish. Our catch keeps the fish plants in Kodiak and the Alaska Peninsula viable enough to remain open year round.

We compete with trawl fisheries that will be all be rationalized from the Bering Sea to British Columbia, and the West Coast. They have large operational and economic efficiencies over us. While we are forced to continue the "race for fish", they have the ability to slow down and do things more efficiently.

We feel that a cooperative management structure in our sector is vital to the long-term survival and viability of our industry and of the Gulf of Alaska coastal communities. Therefore, we ask you to support the trawl sector in our effort to move forward immediately with establishing rationalized cooperatives for all Gulf of Alaska Groundfish species.

Sincerely,

William M. Bisbee, President  
Mar Pacifico Inc.

Sent by fax to fax #(907) 271-2817 with original being sent by U.S. Express Mail  
#ED633005316US

*Ardingers*

1710 Mill Bay Road  
Kodiak, Alaska 99615

Tel#: (907)486-5554 fax#:(907)486-5564

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NOV 30 2005  
N.P.F.A.C

FACSIMILE TRANSMITTAL SHEET

TO: STEPANIE MADSEN

FROM: BEN ARDINGER

COMPANY: NORTH PACIFIC  
FISHERIES COUNCIL

DATE: 11/30/05

FAX NUMBER: 907-271-2817

TOTAL NO. OF PAGES INCLUDING  
COVER: 1

PHONE NUMBER:

SENDER'S REFERENCE NUMBER:  
907-486-5554

RE: AGENDA ITEM C5

URGENT  FOR REVIEW  PLEASE COMMENT  PLEASE REPLY

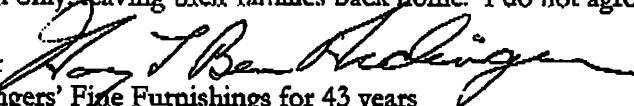
NOTES/COMMENTS:

Please do not make any decisions on Gulf Rationalization for 18 months until further studies have been completed.

If the Gulf Rationalization takes place, this will have a devastating affect on Kodiak and other fishing communities. Fewer boats, less crew jobs, will equal less spend able dollars in the community. The selected few that stay in the fisheries will become multi millionaires overnight. Most of these people will probably move out of state and come to Alaska for the fishing season only leaving their families back home. I do not agree with this.

Ben Ardinger

Owner, Ardingers' Fine Furnishings for 43 years



P.S. I was a commercial fisherman for 20 years

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**Daily News - Miner**

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M.F.S.C.

November 30, 2005

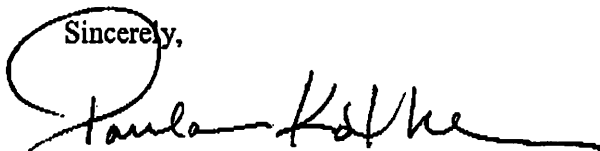
To: Stephanie Madsen  
North Pacific Fisheries Council Chair

I am requesting that you "Stand Down" on making any decisions regarding Gulf Rationalization for 18 months and after the review of the crab rationalization.

As the parent company of the Kodiak Daily Mirror, we share the concerns of businessses and families who are greatly suffering economically.

Thank you for your consideration in this matter.

Sincerely,



Paula Kothe  
Advertising Director

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Thank you for your consideration in this matter.

Sincerely,



Marilyn Romano  
Publisher



# Kodiak Daily Mirror

---

1419 Selig Street  
Kodiak, Alaska 99615  
Telephone: (907) 486-3227  
Fax: (907) 486-3088  
kdmnews@ptialaska.net

11/30/05

To: North Pacific Fisheries Council Chair: Stephanie Madsen

I am requesting that you "Stand Down" on making any decisions regarding Gulf Rationalization for 18 months and after the review of the crab rationalization.

I work at the local newspaper and am directly involved with businesses and families who are greatly suffering economically.

Thank you for your consideration on this matter.

*Jane Stok*  
Circulation Coordinator

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NOV 30 2005

M.P.E.M.C.

# Kodiak Daily Mirror

---

1419 Selig Street  
Kodiak, Alaska 99615  
Telephone: (907) 486-3227  
Fax: (907) 486-3088  
kdmnews@ptalaska.net

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Thank you for your consideration on this matter.

*Ed Bergmann*  
Classified Sales

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NOV 30 2005  
N.P.F.M.C.

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Thank you for your consideration on this matter.

*Deborah K. Carver 11/30/05  
prop reader*

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NPFFMC

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Kodiak, Alaska 99615  
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*A. Peterson*  
Amy E Peterson  
Advertising Sales Representative

REC  
NOV 30 2005  
NPFRC

# Kodiak Daily Mirror

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Kodiak, Alaska 99615  
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Fax: (907) 486-3088  
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Thank you for your consideration on this matter.

*Amy Willis*  
*Publisher*

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ALASKA

# Kodiak Daily Mirror

---

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Kodiak, Alaska 99615  
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*David Schaefer* Display Advertising Rep.

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# Kodiak Daily Mirror

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Kodiak, Alaska 99615  
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Fax: (907) 486-3088  
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*Lynn Dolin*  
*Advertising Manager*

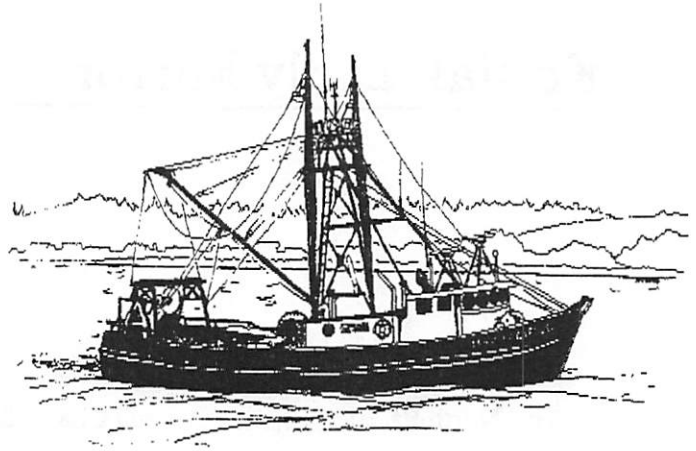
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NOV 30 2005  
MEMPHIS

**Mar Pacifico, Inc. c/o**  
**F/V Mar Pacifico**

P. O. Box J

South Bend, Washington 98586

(360) 875-5672



November 30, 2005

Dear Ms. Stephanie Madsen:

Reference: Rationalization Plan

I am a fisherman and have been involved with the Gulf of Alaska fisheries for the past twenty years. We own the F/V Mar Pacifico, which has been working out of Kodiak for the last fifteen years. The vessel use to fish out of Dutch Harbor and caught millions and millions of pounds of fish during the joint venture years and helped the shorebased out west for a time to develop markets.

Captain Wayne Tipler and his family moved to the Kodiak area where they raised their children. While in Kodiak we lost our Bering Sea pollock and cod rights for our deliveries were on either side of the window for the rationalization of the Bering Sea.

Mr. Tipler and I see a big problem developing in the Gulf for it is becoming the last area for derby fishing. People are gearing up and activating old vessels and their permits to get into the fishery so they can obtain a piece of the Gulf rationalization. Mr. Tipler has been fishing the Gulf and helped to develop the markets around Kodiak for cod, pollock and flatfish when people didn't want to buy much of it or pay very much for it.

I know that Captain Wayne Tipler's concerns are very real and true for I have another 96"trawler, the F/V Orion", which qualifies for the Gulf and has no current landings. I will be rigging it to enter the Gulf fisheries for the 2006 year along with other people I know, to get our foot in the door before you close it.

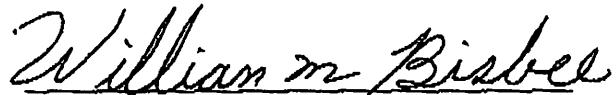
Mr. Tipler and I feel that the time is overdue and if I am cut off it is really the right thing to do, for the historic people that have been there for years and do not want to see anymore newcomers.



We also see a big problem with the vessels double-dipping from other fisheries into the Gulf and rationalization, if it doesn't come soon, will dilute the old Kodiak historic players shares.

Thank you very much for your time and consideration in this matter.

Sincerely,

A handwritten signature in cursive script that reads "William M. Bisbee". The signature is written in black ink and is positioned above the typed name and title.

William M. Bisbee, President  
Mar Pacifico Inc.

Crab Rotz

November 28, 2005

John Rotter, Captain  
William Gilbert, Owner  
F/V Alaska Dawn  
PO Box 405  
Sand Point, AK 99661

Ms. Stephanie Madsen, Chair  
North Pacific Fisheries Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

Re: Agenda Item C-5 GOA Groundfish Rationalization

Dear Madam Chair:

I am writing to protest the designation of the FV Alaska Dawn as "*Subject to GOA groundfish directed fishery "sideboard" closures, not including Pacific cod closures.*" The FV Alaska Dawn catch history clearly proves that the boat is a long-term "true" GOA trawl catcher vessel and dependent on those fisheries. Opilio crab (BSS) fishing has been a minor part of our fishing plan for many years compared to GOA trawl fishing, and it will continue in that vein in the future. The FV Alaska Dawn consistently fishes pollock in the WGOA and the CGOA and p-cod in the WGOA, along with occasional participation in Adak and other Bering Sea p-cod fisheries. The FV Alaska Dawn receives so little allocation of Bering Sea Snow crab (BSS) that given a chance we would relinquish it if we could be exempt from GOA groundfish sideboards.

Under the BSS crab sideboard program we will be prohibited from fishing economically in the GOA. Since our major focus has been GOA groundfish trawling for many years, we fear that if this new sideboard program now limits us we will also lose our place in GOA groundfish rationalization as well. We are appealing the sideboard designation with NMFS at this time in hopes that we can at least fish this coming season while we pursue this matter at the NPFMC. When the NPFMC does take up BSAI crab issues we ask for your consideration of our situation. Until that time please also consider our plight in regards to GOA groundfish rationalization, which is our bread and butter.

I am attaching our appeal letter to NMFS on this sideboard issue.

Thank you for your consideration,

Sincerely,

  
John Rotter, Captain

  
William Gilbert, Owner

attachment

RECEIVED  
NOV 29 2005  
N.P.F.M.C.

November 27, 2005

John Rotter, Captain  
William Gilbert, Owner  
F/V Alaska Dawn  
PO Box 405  
Sand Point, AK 99661

United States Department of Commerce  
National Oceanic and Atmospheric Administration  
National Marine Fisheries Service  
Po Box 21668  
Juneau, Ak 99802-1668

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NOV 29 2005

N.P.F.M.C.

Dear Sir or Madam:

We wish to protest the preliminary determination for a GOA directed groundfish sideboard endorsement restriction for the FV Alaska Dawn. Your letter dated November 4, 2005, indicated that the FV Alaska Dawn was "*Subject to GOA groundfish directed fishery "sideboard" closures, not including Pacific cod closures.*" We are now in receipt of a second letter dated November 16, 2005, in which you modifies your initial determination and now the FV Alaska Dawn is "*Subject to GOA groundfish directed fishery "sideboard" closures, including Pacific cod closures*". We agreed initially that the FV Alaska Dawn should be Pacific cod exempt for the GOA, but we also felt that the vessel should be exempt for other groundfish as well. Now under the subsequent determination we are forced to protest vigorously.

The FV Alaska Dawn catch history clearly proves that the boat is a long-term "true" GOA trawl catcher vessel. Opilio crab (BSS) fishing has been a minor part of our fishing plan for many years compared to GOA trawl fishing, and it will continue in that vein in the future. The FV Alaska Dawn consistently fishes pollock in the WGOA and the CGOA and p-cod in the WGOA, along with occasional participation in Adak and other Bering Sea p-cod fisheries. The FV Alaska Dawn receives so little allocation of Bering Sea Snow crab (BSS) that given a chance we would relinquish it if we could be exempt from GOA groundfish sideboards.

The FV Alaska Dawn has been and continues to be a very competitive vessel in the GOA groundfish fisheries and has caught a high liner share for many years. Our business will be destroyed if we are somehow sideboarded to an aggregate share of p-cod and especially pollock that was primarily caught by pot boats during the 1996-2000 time period. If we should be subject to groundfish sideboards, we should be aggregated with vessels that operate like us. The only other boats that operate remotely like we do are a few AFA trawl catcher vessels with BSS crab history. The FV Alaska Dawn is exempt from the AFA sideboards because we relinquished our very minor allocation under the AFA program. We should be allowed the same opportunity under this program. If we cannot relinquish our BSS allocation, then we should be sideboarded in the GOA along

with other non-AFA trawl catcher vessels with small BSS allocations, like ourselves. We are not aware of any other vessel that will fit that description.


We are certain that quick review of this sideboard program and the associated vessel database will demonstrate that the FV Alaska Dawn is unique in that it is obviously a GOA dependent trawl catcher vessel. The other exempt boats are pot boats with some harvest history of GOA p-cod. The Alaska Dawn has very significant harvest of both p-cod and pollock in both the WGOA and the CGOA. If the FV Alaska Dawn is restricted to fishing to a share of the sideboard amounts of pollock caught in the CGOA and WGOA during the qualifying period 1995-2000, the vessel will likely be bankrupted. So little pollock was harvested in the CGOA by sideboarded vessels in this category during the qualifying years, that the sideboard fishery might not even be opened. Virtually all of the pollock caught during that time frame by the sideboarded fleet was apparently the result of pollock bycatch in directed p-cod pot fisheries. The sideboard allocation for CGOA pollock will be so small, that a directed fishery is absurd. Our participation during the years since 2000 as a GOA pollock trawler is very significant. If the GOA groundfish sideboards confine us, we will lose the mainstay fishery that we depend upon above any other.

GOA pollock and p-cod fishing is not a new fill in fishery for us. We have been totally involved for many years. If anything, Opilio fishing was a fill in. If we are forced out of our usual and accustomed fishery because of our relatively casual participation in Opilio fishing, this will be a travesty and a complete contradiction in the whole purpose of the sideboard program.

In conclusion, we vigorously protest your determination that the FV Alaska Dawn is subject to GOA groundfish sideboards. We protest on the grounds that we should be considered as a GOA groundfish dependent trawl catcher vessel. We request to be identified and if necessary, sideboarded, with other similar vessels. That group would be non-AFA, trawlers, with extensive GOA groundfish participation in both p-cod and pollock fisheries, in both the WGOA and the CGOA. The FV Alaska dawn is not now and has never been primarily a pot-fishing vessel for GOA groundfish. This sideboard program is absolutely in error if it forces us into that designation.

Thank you for your consideration.

Sincerely,

  
John Rotter, Captain  
Owner

  
William Gilbert,

J. Rotter  
Crab Ratz

List of LLP Groundfish Licenses Limited by Sideboards

LLP License: ADFG of Sideboarded Original Qualifying Vessel Affected by Sideboards, LLP License: Name of Sideboarded Original Qualifying Vessel Affected by Sideboards, Affected LLP Groundfish License, Subject to GOA Sideboards, GOA Sideboarded P. cod Exempt, GOA Sideboarded and GOA P. cod Directed Fishing Prohibited, Contact Holder: Company or Last Name, First Name, Address 1, Address 2, City, State, Zip

30601, LADY SIMPSON, LLG1278, Y, N, Y, SIMPSON, KENNETH, PO BOX 240449, ANCHORAGE, AK, 99524-0449  
 6858, ANNA MARIE, LLG1379, Y, N, Y, "DIAMONDBACK SEAFOODS, INC.", 916 DELANEY ST, ANCHORAGE, AK, 99501  
 -30, ROLLO, LLG1390, Y, N, N, SVINO ENTERPRISES INC, 18504 RIDGEFIELD RD NW, SHORELINE, WA, 98177  
 -3525, KODIAK, LLG1452, Y, N, N, "LONGRICH ENTERPRISES, INC.", PO BOX 2494, KODIAK, AK, 99615  
 97, OCEAN FURY, LLG1538, Y, N, Y, "FURY GROUP, INC.", 4005 20TH AVE W, STE 207; SEATTLE, WA, 98199  
 -35833, COURAGEOUS, LLG1576, Y, N, N, "AKULURAK, LLC", 4502 14TH AVE NW, SEATTLE, WA, 98107  
 -34855, BARANOF, LLG1578, Y, N, N, ROMANZOF FISHING COMPANY LLC, 4502 14TH AVE NW, SEATTLE, WA, 98107  
 -65577, TIME BANDIT, LLG1624, Y, N, N, "TIME BANDIT, LLC", PO BOX 3643, HOMER, AK, 99603  
 14963, JEANOAH, LLG1732, Y, Y, N, "FAIRWEATHER FISHERIES, INC.", PO BOX 507, WALDPORT, OR, 97394  
 37241, BIG BLUE, LLG1765, Y, N, N, F/V BIG BLUE LLC, PO BOX 663, CATHLAMET, WA, 98612  
 62537, ALASKA DAWN, LLG1905, Y, N, N, GILBERT, WILLIAM, PO BOX 5705, BELLINGHAM, WA, 98225  
 35977, PACIFIC SUN, LLG1922, Y, N, N, DEEVER, DENNIS, 84 LAS QUEBRADAS LN, ALAMO, CA, 94507  
 6101, SHELLFISH, LLG1970, Y, N, N, "MAP HOLDINGS, LLC", 1242 STATE AVE SUITE 1, BOX 214, MARYSVILLE, WA,  
 6710, IRENE H, LLG2057, Y, N, N, "IRENE H, LLC", 3097 INLAND DRIVE S, SALEM, OR, 97302  
 23460, BIG VALLEY, LLG2077, Y, N, N, "SAGAKA FISHING, INC.", 10226 CLOVER RANCH DRIVE, SACRAMENTO, CA,  
 38864, EL DAN, LLG2105, Y, N, Y, HEGGE, MATTHEW, PO BOX 3388, KODIAK, AK, 99615  
 25041, ALASKA SEA, LLG2214, Y, N, Y, "ERLA-N, LLC", 1736 205TH PL NE, SAMMAMISH, WA, 98074  
 -58133, KATHERINE, LLG2217, Y, N, N, ALWERT, MARK, PO BOX 1711, KODIAK, AK, 99615  
 -3535, AMATULI, LLG2259, Y, N, N, "GUNN AMATULI, INC", 1445 NW 56TH STREET, SEATTLE, WA, 98107  
 46854, STORM BIRD, LLG2286, Y, N, Y, "STORMBIRD, INC.", PO BOX 714, KODIAK, AK, 99615  
 -53800, NORTH POINT, LLG2287, Y, N, N, NORTHPOINT FISHERIES, PO BOX 714, KODIAK, AK, 99615  
 963, WESTERN MARINER, LLG2320, Y, N, Y, "WESTERN MARINER, LLC", 5470 SHILSHOLE AVE NW 410, SEATTLE, WA  
 56492, NOR QUEST, LLG2361, Y, N, Y, F/V NORQUEST LLC, 916 DELANEY ST, ANCHORAGE, AK, 99501  
 -37, ATLANTICO, LLG2470, Y, N, N, "ATLANTICO, INC.", PO BOX 129, SISTERS, OR, 97759  
 -4, NEW VENTURE, LLG2628, Y, N, N, "NORDIC STAR FISHERIES, INC.", 4224 S DRIFTWOOD DR, SPOKANE, WA, 9920  
 -21652, MAR DEL SUD, LLG2645, Y, N, N, "MAR DEL SUD, LTD.", PO BOX 1573, KODIAK, AK, 99615  
 -3, CAPRICE, LLG2752, Y, N, N, "CAPRICE, INC.", 164 PELICAN WAY, FRIDAY HARBOR, WA, 98250  
 -41, PACIFIC MIST, LLG2761, Y, N, N, STEELE, JEFF, PO BOX 3476, KODIAK, AK, 99615  
 49317, ECHO BELLE, LLG2774, Y, Y, N, "F/V ICELANDER, INC", PO BOX 207, CHINOOK, WA, 98614  
 -38972, KATRINA EM, LLG2777, Y, N, N, "KATRINA-EM, INC.", PO BOX 3065, KODIAK, AK, 99615  
 34374, OBSESSION, LLG2816, Y, N, N, STEELE, JEFF, PO BOX 3476, KODIAK, AK, 99615  
 36800, SEABROOKE, LLG2924, Y, N, N, "F/V SEABROOKE ENTERPRISES, LLC", 83972 EASTSIDE RD, MILTON-FREEW  
 8788, TUXEDNI, LLG3002, Y, N, N, WARDS COVE PACKING CO., PO BOX 5030, SEATTLE, WA, 98105-0030  
 -59578, NORTHERN SPIRIT, LLG3030, Y, Y, N, GOULD, ARCHIE, 500 AIRPORT RD, KING COVE, AK, 99612  
 58239, SNUG HARBOR, LLG3060, Y, N, N, "KYJA FISHERIES, LLC", 7223 55 TH STREET SE, SNOHOMISH, WA, 98290  
 -56126, ALEUTIAN LADY, LLG3090, Y, N, N, SHELFORD, RICHARD, PO BOX 12946, MILL CREEK, WA, 98082-2946

35949,ALASKA SPIRIT,LLG3092,Y,N,N,SPIRIT OF ALASKA SEAFOODS LLC,,PO BOX 3128,,KODIAK,AK,99615  
 61605,OCEAN BALLAD,LLG3194,Y,N,Y,"OCEAN BALLAD, INC.",,112 HARRISON ST,,CENTRALIA,WA,98531  
 61571,GUARDIAN,LLG3212,Y,N,N,"SNOW KING, INC.",,1917 N BEAVER CK RD,,SEAL ROCK,OR,97376  
 42234,DESTINATION,LLG3327,Y,N,N,"DESTINATION, INC.",,PO BOX 17701,,SEATTLE,WA,98127  
 8225,SEA VENTURE,LLG3558,Y,N,Y,"GUNN SEA VENTURE, LLC",,1445 NW 56TH ST,,SEATTLE,WA,98107-3726  
 52119,PROVIDENCE,LLG3597,Y,N,N,"GUSTAFSON FISHERIES, INC.",,PO BOX 8573,,KODIAK,AK,99615  
 60100,BEAUTY BAY,LLG3617,Y,N,N,"BEAUTY BAY, INC.",,84 LAS QUEBRANDAS LANE,,ALAMO,CA,94507  
 7189,KETA,LLG3631,Y,N,N,"F/V KETA, INC.",,PO BOX 17701,,SEATTLE,WA,98127  
 4100,ALASKA CHALLENGER,LLG3666,Y,N,N,ALASKA CHALLENGER L.L.C.,,PO BOX 5030,,SEATTLE,WA,98105  
 65,MIDNITE SUN,LLG3679,Y,Y,N,MIDNITE SUN LLC,,3097 INLAND DRIVE S,,SALEM,OR,97302  
 63333,BERING PROWLER,LLG3681,Y,N,N,"PROWLER, LLC",,PO BOX 1364,,PETERSBURG,AK,99833  
 38639,KAMISHAK QUEEN,LLG3704,Y,N,Y,DEAVER,DENNIS,84 LAS QUEBRADAS LN,,ALAMO,CA,94507  
 57971,VIEKODA BAY,LLG3774,Y,N,N,"VIEKODA BAY, LLC",,PO BOX 3282,,KODIAK,AK,99615  
 199,LIN-J,LLG3776,Y,N,N,"VIEKODA BAY, LLC",,PO BOX 3282,,KODIAK,AK,99615  
 45525,VIGILANT,LLG3779,Y,N,N,"LEE ROSE, INC.",,PO BOX 712,,GRAYLAND,WA,98547  
 39926,ANDRONICA,LLG3808,Y,N,N,"ANDRONICA, INC.",,19239 40TH PL NE,,SEATTLE,WA,98155  
 29089,HORIZON,LLG3843,Y,N,Y,"HORIZON FISHERIES, LLC",,"5470 SHILSHOLE AVE N, STE 500",,SEATTLE,  
 40924,OCEAN HUNTER,LLG3944,Y,N,N,"OCEAN FISHERIES, LLC",,7216 INTERLAAKEN DR,,LAKEWOOD,WA,98499  
 60187,HI SEAS I,LLG3955,Y,N,N,"CASCADE MARINER, LLC",,5470 SHILSHORE AVE NW #410,,SEATTLE,WA,98  
 53,RUFF & REDDY,LLG3981,Y,Y,N,"RUFF & REDDY, INC.",,PO BOX 129,,SISTERS,OR,97759  
 60860,SILVER SPRAY,LLG3983,Y,N,N,"SILVER SPRAY SEAFOODS, LLC",,PO BOX 129,,SISTERS,OR,97759  
 61954,FARRAR SEA,LLG4595,Y,N,N,BELLAMY,RAYMOND,62084 SKYLINE DR,,HOMER,AK,99603

# Groundfish Data Bank

**Alaska**

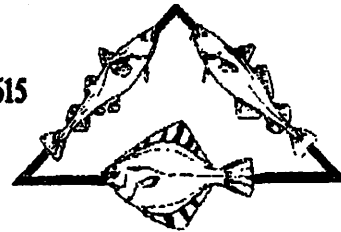
PH: 907-486-3033 FAX: 907-486-3461 P.O. BOX 788 - KODIAK, AK. 99615

Julie Bonney, Executive Director

[jbonney@gci.net](mailto:jbonney@gci.net)

Jennifer Washburn, Fisheries Analyst

[agdb@gci.net](mailto:agdb@gci.net)



## Harvest Years – Alternative 2

2.2.2 Qualifying periods and landing criteria (same for all gears in all areas)

(The analysis will assess AFA vessels as a group)

Option 1. 95-01 drop 1, on a species by species basis

Option 2. 95-02 drop 1, on a species by species basis

Option 3. 95-02 drop 2, on a species by species basis

Option 4. 98-02 drop 1, on a species by species basis

Option 5. 98-03 drop 1, on a species by species basis

## Processing Years – Alternative 2 – AP motion

### 2.3.1.2 Processor License Qualifications (Applies to 2A and 2B)

2.3.1.2.1 To qualify for a processor license, a processor must have purchased and processed a minimum amount of groundfish by region as described below in at least 4 of the following years:

~~Option 1. 1995-99.~~

Option 2. 1995-01

Option 3. 1995-02

Option x. 1998-03

Option x. 1995-03

Option x. 2000-04

### 2.3.2 Provisions affecting Allocation of Harvest Shares to Processors (Alternative 2C)

1. Processors are eligible to receive an allocation of QS if they meet eligibility criteria identified in 2.3.1.2.1.
2. Up to 30% of CV shares shall be designated as “CVP” shares and eligible to be held by processors and CV recipients. A portion of the CVP share allocation will be divided among eligible processors proportional to their history in the qualifying years as outlined in 2.3.1.2.1. Any balance of CVP not distributed initially to processors shall be distributed proportionally to CV recipients.

## Alternative 3

3.2.1 Sector allocations will be based on the aggregate history of vessels in each sector during the qualifying period. Sector allocation qualifying periods and landing criteria (same for all gears in all areas). The analysis will assess AFA vessels as a group.

Option 1. 95-01

Option 2. 95-02

Option 3. 98-02



**3.3.2.2 Qualifying periods and landing criteria (same for all gears in all areas) for determining GH**

(The analysis will assess AFA vessels as a group).

- Option 1. 95-01 drop 1, on a species by species basis
- Option 2. 95-02 drop 1, on a species by species basis
- Option 3. 95-02 drop 2, on a species by species basis
- Option 4. 98-02 drop 1, on a species by species basis
- Option 5. 98-03 drop 1, on a species by species basis

Options to drop years would be to accommodate SSL restrictions or the inclusion of the state portion of the parallel fishery.

**Duncan Fields**  
**Gulf of Alaska Coastal Communities Coalition**  
**Gulf Rationalization – Agenda Item C-6(a)**  
**December 11, 2005**

Madam Chairman, Members of the Council,

My name is Duncan Fields and I represent a coalition of approximately 42 Gulf of Alaska fisheries dependant coastal communities of less than 1,500 people. In the Central and Western Gulf of Alaska, there are approximately 22 communities represented by the Coalition. As most of you are aware, the Coalition strongly advocates that the Council analyze and ultimately approve both the Community Fisheries Quota (CFQ) program and the Community Purchase Program in the community protections portion of your Gulf of Alaska groundfish rationalization package. Today I have four issues to address.

1. The Coalition supports the AP motion on Community Protections but recommends, based on new verbal information from NOAA General Council, regarding limiting fishing of the CFQ to community residents, that the Council request a written opinion from NOAA General Council regarding these limitations. It is important that all involved clearly understand the agencies' position. The Council need not be in a hurry to solve this issue. With additional discussion, perhaps we can come up with a solution.
2. The coalition does not support the elimination of red king crab and the "other species" salmon from the Council's, salmon and crab bycatch analysis and options. Given the very low numbers of red crab remaining in the Gulf and the limitations on the subsistence use of red crab to one per household, it could appear indifferent for the Council to eliminate red crab bycatch considerations. Also, given significant concerns about salmon bycatch on the Pacific Coast and Bering Sea, it would seem that the Council would want to provide analysis of the Gulf's "other salmon" bycatch category and possible, but not necessarily onerous, bycatch provisions.

3. The Council should appoint a "crewman's protections" industry work group consisting of vessel owners, crewmen and community representatives to provide the Council with a range of alternatives for inclusion in the GOA rationalization motion. It is important for the Council to amplify, as a matter of public policy, the unique impacts of rationalization on crewman. More rural residents participate in groundfish fisheries as crewman than in any other capacity. Failure to provide meaningful crewman protections will disproportionately impact small, rural, fisheries dependant communities. I would welcome the opportunity to work on a Crewman's Protections committee on behalf of crewmen from smaller GOA communities.

4. The Coalition and the communities we represent request that the Council reinstate the class of Amendment 66 qualified communities as an option in the analysis for CFQ qualification. ( see C 1.3, page 2). See also Table 8.

**(Proposed Language)**

**Option 4. Communities qualified under FMP Amendment 66. (The community purchase program for halibut and sablefish) .**

The Coalition believes the Council took a step back on the CFQ qualification portion of your motion through actions taken at the June meeting. Despite the unanimous recommendation of the community protections committee to consider inclusion of the 22 Amendment 66 communities – those communities with any fishing history – for the CFQ program, the council limited the Community Fisheries Quota program to communities that have "groundfish" fishing history only. The current analysis demonstrates that the Council's decision eliminates four smaller, fisheries dependant communities from consideration for the CFQ program. Nanwalek, Akhiok, Tyonek and Karluk (table 4). These communities, with the exception of Karluk, have recent fishing history, just not groundfish landings (table 8).

As you are aware, the CFQ is intended to provide jobs and revenue that can contribute toward sustaining fisheries based opportunities in isolated GOA coastal communities. It is anticipated that some portion of the revenues from the CFQ, (see C 1.12 page 4) will be shared annually with member communities. Arguably, the communities you have eliminated are the most needy and, proportionally, would benefit the most from the CFQ program. It is further anticipated the CFQ revenue sharing will enable these communities to initiate their halibut and sablefish IFQ acquisition opportunities under Amendment 66.

The touchstone of our advocacy both for the CFQ and for the inclusion of communities with more general fishing history – not just groundfish history— is National Standard 8 of Magnuson-Stevens. This standard doesn't provide species specificity as a qualifier but talks about "fisheries communities". Management measures shall, ...."take into account the importance of fishery resources to fishing communities in order to (A) provide for the sustained participation of such communities, and (B) to the extent practicable, minimize adverse economic impacts on such communities."

One argument for the "groundfish only" standard is some sense that there isn't enough value from CFQ in the Gulf to help all 22 communities qualified under Amendment 66 and consequently the CFQ value for 17 or fewer remaining communities will increase.. Although this is true, it also moves several communities outside the underlying purpose of the program and is contrary to the desires of the remaining qualifying communities. Again, the intent of the CFQ is to be responsive, throughout Gulf Rationalization to National Standard 8 in providing fishing communities with sustained participation--- fisheries communities generally, not just groundfish communities. Remember, fishing quota and dollar values deemed small by some measures are considered substantial by many of these communities.

Thank you.

Also, thank you for the Council staff's work on the CFQ program over the past year. I believe, at this point, that the CFQ is the most refined part of the motion.

Jay Stinson

# Groundfish Data Bank

**Alaska**

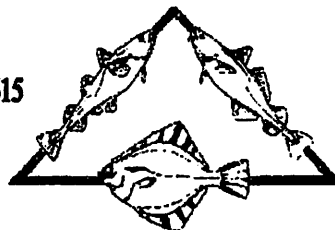
PH: 907-486-3033 FAX: 907-486-3461 P.O. BOX 788 - KODIAK, AK. 99615

Julie Bonney, Executive Director

[jbonney@gci.net](mailto:jbonney@gci.net)

Jennifer Washburn, Fisheries Analyst

[agdb@gci.net](mailto:agdb@gci.net)



December 10, 2005

Summary of who signed the letter to council chair Stephanie Madsen to continue to move forward immediately with GOA rationalization for the trawl sector:

69 people have signed the letter from 43 different trawl vessels.

31 are vessel owners that do not operate the vessel

12 are vessel owners and operators

20 are vessel operators without ownership

12 are vessel crew

4 are not trawlers (vessel managers, ship yard owner, kayak guide)

*Jay Stinson*

**Ms Stephanie Madsen**

**North Pacific Fishery Management Council**

605 West 4<sup>th</sup> Avenue, Suite 306

Anchorage, Ak. 99501-2253

**Re: Agenda Item C-5 Gulf of Alaska Groundfish Rationalization**

**Dear Madame Chair,**

We, the undersigned are Gulf of Alaska groundfish trawl fishermen and believe that our sector needs to be rationalized. Since 1998 our numbers have shrunk from 170 to just 77 in 2004. During that same time period the gross exvessel receipts have shrunk by 50%. We are the only gear type that can efficiently catch pollock, rockfish, and flatfish. Our catch keeps the fish plants in Kodiak and the Alaska Peninsula viable enough to stay open year round.

We compete with trawl fisheries that will soon all be rationalized from the Bering Sea to British Columbia, and the West Coast. They have big operational and economic efficiencies over us. While we are forced to continue the "race for fish", they have the ability to slow down and do things more efficiently.

We feel that a cooperative management structure in our sector is vital to the long-term survival and viability of our industry and of Gulf of Alaska coastal communities.

Therefore we ask you to support the trawl sector in our effort to move forward immediately with establishing rationalized co-ops for all Gulf of Alaska groundfish species.

Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or <u>operator</u>
1.	Kenny Remoulds	<i>[Signature]</i>	F/V DAWN	Operator
2.	Dennis Eggars	<i>[Signature]</i>	F/V Dawn	Relief operator
3.	Kent Helligso	<i>[Signature]</i>	F/V Pacific Star	owner
4.	Colleen Helligso	<i>[Signature]</i>	F/V LAURA	owner
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9.				
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**Gold Rush Fisheries, LLC**  
25195 SW Parkway Avenue, Suite 111  
Wilsonville, OR 97070  
(503) 570-8899 phone  
(503) 570-8896 fax

November 29, 2005

Ms. Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501-2253

**RE: Agenda Item C-5 Gulf of Alaska Groundfish Rationalization**

Dear Madame Chair,

We, the undersigned are Gulf of Alaska groundfish trawl fishermen and believe that our sector needs to be rationalized.

Since 1998 our numbers have decreased from 170 vessels to just 77 in 2004. During that same time period the gross exvessel receipts have been reduced by 50%. We are the only gear type that can efficiently catch pollock, rockfish, and flatfish. And as such, our catch keeps the fish plants in Kodiak and the Alaska Peninsula viable enough to stay open year round.

We are competing with trawl fisheries that will soon all be rationalized from the Bering Sea to British Columbia, and the West Coast. They have major operational and economic efficiencies over us. While we are forced to continue the "race for fish", they have the ability to manage and plan operations that result in dramatically more effective and efficient utilization of economic, human and environmental resources.

We feel that a cooperative management structure in our sector is vital to the long-term survival and viability of our industry and of Gulf of Alaska coastal communities.

Therefore we ask you to support the trawl sector in our effort to move forward immediately with establishing rationalized co-ops for all Gulf of Alaska groundfish species.

Respectfully submitted by,



	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	MARK SMITH	<i>Mark Smith</i>	F/V GOLD RUSH	operator
2.	Bert Ashley	<i>Bert Ashley</i>	GOLD RUSH	owner/operator
3.	Gidget Little	<i>Gidget Little</i>	GUIDEWITHTH GIDEET	owner / KAYAKER GUIDE
4.	Melinda Ashley	<i>Melinda Ashley</i>	F/V GOLD RUSH	mgmt.
5.	Donald Ashley	<i>Donald Ashley</i>	F/V Gold Rush	MANAGER
6.	John Hogan	<i>John Hogan</i>	Ocean View Marine	Ship Yard Owner
7.	Taylor Ashley	<i>Taylor Ashley</i>	F/V GOLD RUSH	CREW
8.	chris Groth	<i>Chris Groth</i>	F/V GOLD RUSH	<i>Bert Ashley</i> CREW/OPERATOR
9.				
10.				

To: Julie @ 907-486-3461

Ms Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Ak. 99501-2253

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Therefore we ask you to support the trawl sector in our effort to move forward immediately with establishing rationalized co-ops for all Gulf of Alaska groundfish species.

Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Pete Macdonald	Pete Macdonald	Exceller	Operator
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**Ms Stephanie Madsen**  
**North Pacific Fishery Management Council**  
 605 West 4<sup>th</sup> Avenue, Suite 306  
 Anchorage, Ak. 99501-2253

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We feel that a cooperative management structure in our sector is vital to the long-term survival and viability of our industry and of Gulf of Alaska coastal communities.

Therefore we ask you to support the trawl sector in our effort to move forward immediately with establishing rationalized co-ops for all Gulf of Alaska groundfish species.

Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Ron Naughton	Ron Naughton	Hazel Lorraine	Operator
2.	Paul Vargo	Paul Vargo	Hazel Lorraine	CREW
3.	Tina Marsh	Tina Marsh	Hazel Lorraine	CREW
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**Ms Stephanie Madsen**  
**North Pacific Fishery Management Council**  
 605 West 4<sup>th</sup> Avenue, Suite 306  
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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Jason Charnice	<i>Jason Charnice</i>	TOPAZ	OPERATOR
2.	Matthew Tormela	<i>Matthew Tormela</i>	TOPAZ	CREW
3.	RYAN CHANDLER	<i>Ryan Chandler</i>	TOPAZ	CREW
4.	Cynthia Chandler	<i>Cynthia Chandler</i>	TOPAZ	Owner
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Ms Stephanie Madsen  
 North Pacific Fishery Management Council  
 605 West 4<sup>th</sup> Avenue, Suite 306  
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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Charlie Parsons	<i>[Signature]</i>	Nightwatch	owner operator
2.	Lucas Scabelin	<i>[Signature]</i>	Nightwatch	crew member
3.	Remo Löttscher	<i>[Signature]</i>	Nightwatch	crew
4.				
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Ms Stephanie Madsen  
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 605 West 4<sup>th</sup> Avenue, Suite 306  
 Anchorage, Ak. 99501-2253

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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	JAY STINSON	<i>[Signature]</i>	F/V ANASKAN	Both
2.	Margaret Hall	<i>[Signature]</i>	F/V Progress	owner
3.	Mark Chandler	<i>[Signature]</i>	F/v Topaz	owner
4.	David Wilson	<i>[Signature]</i>	Lady Joanne	owner
5.	Frank Melseth	<i>[Signature]</i>	Decision	owner
6.	Robert Puratich	<i>[Signature]</i>	Marauder	owner
7.	JOE PURATICH	<i>[Signature]</i>	MARAUDER	owner
8.	Tom Evich	<i>[Signature]</i>	Karen Evich	Both
9.	STEVE DRAGE	<i>[Signature]</i>	COHO	BOTH
10.	Mike Alfieri	<i>[Signature]</i>	OCEAN STORM	Both

Ms Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	DAN MACDONALD		EXCELLER	OWNER
2.				
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Ms Stephanie Madsen  
 North Pacific Fishery Management Council  
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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Robin Larsen	<i>Robin Larsen</i>	Courty road	operator
2.	" "	<i>Robin Larsen</i>	Alekh	owner
3.	John de Groen	<i>John de Groen</i>	Primus	owner
4.	JERRY DOWNING	<i>Jerry Downing</i>	EXODUS EXPLORER	OWNER
5.	Melvin Larsen	<i>Melvin Larsen</i>	Temptation	owner
6.	Marilyn Larsen	<i>Marilyn Larsen</i>	Temptation	co-owner
7.	ALVIN BURCH	<i>Alvin Burch</i>	DAWN + DUST	CO-OWNER
8.	Barbara Burch	<i>Barbara Burch</i>	" "	" "
9.				
10				



Ms Stephanie Madsen  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Ak. 99501-2253

**Re: Agenda Item C-5 Gulf of Alaska Groundfish Rationalization**

Dear Madame Chair,

We, the undersigned are Gulf of Alaska groundfish trawl fishermen and believe that our sector needs to be rationalized. Since 1998 our numbers have shrunk from 170 to just 77 in 2004. During that same time period the gross exvessel receipts have shrunk by 50%. We are the only gear type that can efficiently catch pollock, rockfish, and flatfish. Our catch keeps the fish plants in Kodiak and the Alaska Peninsula viable enough to stay open year round.

We compete with trawl fisheries that will soon all be rationalized from the Bering Sea to British Columbia, and the West Coast. They have big operational and economic efficiencies over us. While we are forced to continue the "race for fish", they have the ability to slow down and do things more efficiently.

We feel that a cooperative management structure in our sector is vital to the long-term survival and viability of our industry and of Gulf of Alaska coastal communities.

Therefore we ask you to support the trawl sector in our effort to move forward immediately with establishing rationalized co-ops for all Gulf of Alaska groundfish species.

Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Andy BLAIR	<i>Andy Blair</i>	Misty Lutz	yes
2.				
3.				
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*Please* Let's not wait any longer for GOA Rat. we all need it to stay in business. I have trawled in Alaska since 1978. when I started, I have seen the change.

Ms Stephanie Madsen  
 North Pacific Fishery Management Council  
 605 West 4<sup>th</sup> Avenue, Suite 306  
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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Peter V Kendrick	<i>Peter V Kendrick</i>	<i>7% Advantage</i>	<i>owner operator</i>
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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	ANTHONY JONES	<i>Anthony Jones</i>	Lucky Lady	owner
2.	Carolyn A. Jones	<i>Carolyn Jones</i>	Lucky Lady	crew
3.				
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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Stephanie Madsen	<i>[Signature]</i>	Courtesy Mact	Both
2.	Mart Schanberg	<i>[Signature]</i>	Equinox	Both
3.	David R Wilson Tr	<i>[Signature]</i>	Lady Louisa	operator
4.	Charles Piccuch	<i>[Signature]</i>	CapeCurtain	Both
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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	VERN HALL	<i>[Signature]</i>	VANGUARD/ARROSS	OWNER
2.	DAVID WOOD	<i>[Signature]</i>	ALASKA BEAUTY	Owner
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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Jerry Moore	Jerry L Moore	Pacific Star	Crew
2.	Chris O'Callaghan	Chris O'Callaghan	Pacific star	crew
3.	Rob Langdon	[Signature]	Laura	Captain
4.	John McCARTHY	[Signature]	PACIFIC STAR	CAPTAIN
5.				
6.				
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9.				
10.				

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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Michael MARTIN	Michael Martin	Elizabeth F.	OWNER
2.	Michael MARTIN	Michael Martin	Walter N.	OWNER
3.	Stormy Slates	Stormy Slates	Elizabeth F.	operator
4.				
5.				
6.				
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9.				
10.				

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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Brian G Beaver	Brian G Beaver	Peggy Jo	Captain
2.	Kent Leslie	Kent Leslie	Excalibur II	owner/operator
3.				
4.				
5.				
6.				
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8.				
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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Craig Cochran Pres	Craig Cochran Pres	Bay Islander	owner
2.	Kurt Cochran	Kurt Cochran	MARATHON	OWNER
3.	Larry Boydston	Larry Boydston	New Life	SKIPPER
4.	Mike Lynch	Mike Lynch	MARATHON	SKIPPER
5.	David Richcreek	David Richcreek	RAVEN	SKIPPER
6.	Raymond Hall	Raymond Hall	Lashie Lee	owner
7.	Wilburn Hall	Wilburn Hall	Progress	owner
8.				
9.				
10				

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Respectfully submitted by,

	Name - Print	Name-Signature	Vessel name	Owner or operator
1.	Stephanie Madsen	<i>[Signature]</i>	Courtesy Madsen	Both
2.	Mart Schanberg	<i>[Signature]</i>	Eowinax	Both
3.	David R Gibson Jr	<i>[Signature]</i>	Lady Jeanne	operator
4.	Charles Piccuch	<i>[Signature]</i>	Cape Curtian	Both
5.				
6.				
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9.				
10.				

FIV MaKa (907) 654-0144

11-28-05

North Pacific Fishery Management Council  
RE: C-5 GOA groundfish rationalization

Good day,

I am writing to express my heartfelt opposition to groundfish rationalization in the GOA. I have fished commercially out of Kodiak for over 22 years, participating in pot, longline, trawl and jig operations for GOA groundfish. Over the years I have witnessed and experienced firsthand the detrimental effects of rationalization (halibut, sablefish and Bering sea crab) on employment opportunities and overall economy of Kodiak. At present, I make almost all of my yearly income from harvesting GOA groundfish / rockfish with my 39' vessel. I believe that a rationalization plan will marginalize me, as much of my GOA groundfishing history derives from crewing or from skippering other vessels than my own. I fear that any access privileges or quota shares allocated to me in the advent of GOA rationalization will not adequately reflect or recognize my commitment to my career or to my home town of Kodiak, which I will have to leave in search of better opportunity if I can no longer maintain a reasonable income or lifestyle harvesting GOA groundfish with my vessel. Furthermore, I am chagrined that the rationalization concept leaves little access opportunity for the upcoming generation, the younger fishermen that should be. I would much prefer that the current GOA groundfish management system be retained to as much a degree as possible, perhaps implementing such ~~tools~~ as limited entry or trip limits to avoid overfishing, reduce excessive fleet buildup, enhance fleet safety, and improve product value. Thank you for considering my views.

Cordially  
Dariusz Kasprzak  
Dariusz Kasprzak

**Christine Holland  
Kenneth N. Holland Jr.  
F/V Point Omega  
PO Box 608, Kodiak, AK 99615  
Tel/fax 907-486-3764**

Oral Testimony  
North Pacific Fishery Management Council  
December, 2005

C-5(b) GOA Groundfish Rationalization

- 1. We deserve our GOA p. cod pot Parallel History**
- 2. We want our fishery rationalized as soon as possible.**

Chair Madsen and Council Members

My name is Chris Holland. My husband Ken and I own the 72-foot F/V Point Omega out of Kodiak. Ken is the primary operator and has been fishing in Alaska since 1963. Ken began fishing p. cod with pots in 1987, making him one of the first participants in this fishery.

**We deserve our GOA p. cod pot Parallel History**

Approximately 95% of our Gulf of Alaska federal p. cod pot harvest history with the Point Omega was earned inside three miles while participating in the race to catch the federal p. cod quota during the federal p. cod fishery.

We believe that we deserve the federal p. cod pot harvest history that we earned. We want to participate in a federally rationalized p. cod fishery, and our past federal history gives us the qualification and rights to do so.

We believe that we deserve the same qualification and privileges to participate in a federally rationalized cod fishery as those fishermen who earned their history outside of three miles while fishing in the same race to catch the federal p. cod quota during the same federal cod fishery.

If necessary, we would be pleased to harvest our federal fishing rights under a rationalized Gulf of Alaska p. cod pot fishery outside of three miles.

**We want our fishery rationalized as soon as possible.**

We want our pot fishery rationalized as soon as possible.

We agree with your problem statement, and your problem statement clearly applies to us.

We want to end the race for fish in the pot fishery as early as possible. We need stability in the pot fishery.

We are very concerned about the safety of my husband and his crew, and we believe in and need the safety-related benefits that rationalization will bring.

We want to be able to time our harvest to take advantage of the best marketing and quality opportunities, and the best market value, and rationalization will help with that.

We have seen the benefits of rationalization in the halibut fishery.

We, like many other Gulf of Alaska fishermen, would like to be fishing in a rationalized pot cod fishery now.

We do not want the Council to rationalize the Gulf of Alaska trawl fishery before you rationalize the pot fishery.

We believe that it is important, fair and equitable that rationalization of all groundfish sectors is implemented at the same time.

We understand that each sector has different characteristics, and different needs, and that the elements of a rationalization plan for each sector will be different.

However, rationalizing one sector prior to the other will put the unrationalized sector at a distinct disadvantage.

We know that the Council only has so much attention and resources that you can invest in rationalizing Gulf groundfish, and if you focus on only one sector, we believe that you will not get back to working on the other sector for a long time.

This is not about, and should not be about, who can prove to you that they want rationalization more than any other sector.

In closing,

We deserve our federal p. cod pot history because we want to participate in a federally rationalized fishery.

And, we, like many other p. cod pot fishermen, want our sector to be rationalized as soon as possible, and certainly, no later than any other sector.

Thank you very much for considering our interest in this matter.

Christine Holland  
Kenneth N. Holland, Jr.

Legislation and regulations are also material if they impose significant financial burdens on the owner by reason of mandatory changes to vessel construction, design or equipment.

If the Agreement is reopened pursuant to this paragraph, only those terms affected by the legislation or regulation which resulted in reopening the Agreement are subject to negotiation, and only to the extent of such affect, unless otherwise agreed by all parties to this Agreement.

Agreed to this 25th day of March, 1991.

DEEP SEA FISHERMEN'S UNION  
OF THE PACIFIC  
*John M. Bruce, Executive Director*

FISHING VESSEL OWNERS'  
ASSOCIATION, INC.  
*Bob Alverson, Manager*

**AGREED TO AMENDMENTS**

Agreed to this 9th day of February, 1994.

DEEP SEA FISHERMEN'S UNION  
OF THE PACIFIC  
*Mathew C. Falk, President*

FISHING VESSEL OWNERS'  
ASSOCIATION, INC.  
*Eric W. Olsen, President*

*To meet US Coast Guard Regulation, Section 10601, of the Commercial Fishing Industry Vessel Safety Act of 1988. The Coast Guard asserts crew members and skipper/owner signatures must be signed below and copy kept in log book of vessel.*

\_\_\_\_\_  
Date

\_\_\_\_\_  
Vessel

\_\_\_\_\_  
Skipper/Owner

Crew Members

Date



**SET** *Tim Hentzel C-5*  
**LINE**

**AGREEMENT**

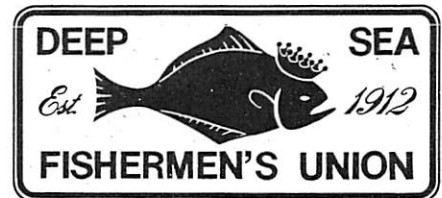
*between the*

**Fishing Vessel  
Owners' Association**



*and the*

**Deep Sea  
Fishermen's Union  
of the Pacific**



## SET LINE AGREEMENT

This Agreement entered into between the DEEP SEA FISHERMEN'S UNION OF THE PACIFIC, hereinafter referred to as the UNION, and the FISHING VESSEL OWNERS' ASSOCIATION, INC., hereinafter referred to as the ASSOCIATION. This agreement covers the share basis and fishing conditions on Halibut and Black Cod vessels. (Although not specified in the original agreement, it was subsequently confirmed that "Halibut and Black Cod Vessels refer to longline vessels and excludes Freezer Longliners, Processors, and vessels with a crew size of less than 3).

1. Members of the crew, except any captain or owner who owns one-fourth or over in his own vessel, must become and remain members of the Union as a condition of continued employment within 30 days or before their second trip, whichever is later. The Captain and/or owner shall be considered as a member of the crew for all practical purposes in this agreement unless otherwise stated.

2. The Master or agent of a vessel, under the direction of the delegate of that vessel, and upon being presented with an annual written assignment signed by any crew member, or with an annual list certified by the President or Agent of the Union, of such crew members who have signed written assignments which are on file with the DSFU, shall automatically withhold annual Union dues and assessments, as approved by the Union membership and certified by the President or Agent of the Union, from whatever shall be due such crew member, and shall forward the amounts so deducted to the Union. Any such assignment shall expire only upon revocation by a Union member. In the event an assignment is filed with an agent of the vessel, the assignment shall apply only to crew members' shares handled by such agent.

3. An inexperienced man, (hereinafter referred to as an inbreaker), going longline fishing for the first time shall be hired from trip to trip on the following basis:

(1) The skipper shall first confer with and obtain the consent of the majority of his regular crew before hiring an inbreaker. (2) SHARE BASIS: Inbreaker shall receive a share to be decided by the crew and skipper by a majority vote, with fair considerations given his contribution to the operations of fishing. His share shall be determined in such a manner until he receives full share. Anyone receiving full share for Black Cod or Snap-on Halibut fishing, shall not necessarily receive full share for conventional Halibut fishing. (3) An inbreaker who is discharged after his first trip because he lacks any potential of becoming a longline fisherman shall receive, from crew expense, at least the cost of his outfit (i.e. fishing clothes, boots, oilskins, gloves, etc.) The vessel shall furnish him transportation to port of hire. (4) A cook, who has had experience cooking on vessels, shall receive a full share, provided he works on deck to the satisfaction of the crew. Otherwise, he shall be considered an inbreaker and same conditions apply as under (2) above.

4. GROSS STOCK shall consist of all income of every kind from fishing operations and shall be distributed by deducting from it the following items in the order given: (a) GROSS STOCK EXPENSE; (b) BOAT SHARE; (c) CREW EXPENSE. The amount remaining after these deductions have been made shall be equally divided, except as provided for in paragraph 3, among all members of the crew including the master; or in case a hole trip results, the deficit shall likewise be divided and paid according to paragraph 19.

5. GROSS STOCK EXPENSE shall consist of the following: moorage fees at out-ports, custom fees, brokerage fees, delivery license, outfit and cargo insurance, watchmen's fees; charges as per paragraphs

22-(5) (b) and 24, fumigation costs when master and crew find fumigation necessary, lay-up fund assessments as agreed to in supplementary agreement between Union and Association, lost gear, Washington state B&O tax, and observer fees and the costs of administration of IFQ's. No fees will be charged to the crew or taken as a gross stock expense for any initial allocation of IFQ's.

6. BOAT SHARE FROM ADJUSTED GROSS STOCK ON LONGLINING TRIPS for all Association vessels shall be as follows:

Vessels 1991 .....	31.0%
Vessels 1992 & thereafter .....	31.5%

7. CREW EXPENSE shall consist of the following: grub, fuel oil, lube oil, cup grease, waste or rags, ice, salt, bait, condemned fishing gear, dish towels, tablecloths, broom and mop for living quarters, baiting tent cover maintenance and replacement, medicine chest maintenance, and replacement of broken or damaged kitchen utensils. PROVIDED, however, the boat delegate, cook, and captain shall check the cooking utensils for necessary replacements at the start of the season and the vessel shall be fully equipped with proper crockery dishes and kitchen utensils at no expense to the crew. Broken and damaged utensils shall not mean utensils that are worn out through usage. When a crew replaces damaged or broken utensils, the amount charged to crew expense shall be for a utensils of comparable quality and value as the one replaced.

8. All the fuel oil and lube oil tanks shall be filled and oil paid for by the owner at the start of the season. The tanks shall then be filled and paid for by the crew before settlement at the end of each trip; provided, however, that on any trip which precedes a lay-up of more than eight days' time, or precedes a lay-up during which the vessel is to be drydocked or repaired where having full tanks would not be practical the amount of fuel and lube oil used on the trip shall be estimated by the master and crew. In no case shall the crew pay for more fuel oil and lube oil than is used.

9. FISHING GEAR shall consist of the following: groundlines gangings, hooks, beackets, twine, tar, skatebottoms and covers, skat ropes, thimbles, buoys (kegs and bags), buoylines, buoylight complete with batteries and globes, anchors, markbuoys with lines and anchor flag poles complete with weights, floats, (bags), lines and flags; paint for buoys, skatebottoms and covers; files, gaffhooks, dressing knives choppers, butchersteels, whetstones, scrapers and scraper hose, bait nets, electric lights globes, chain for gear anchors, glass balls and lost gear drag.

10. Fishing gear accepted by the master and crew coming in shall not be condemned going out, but gear in storage for over nine month shall be subject to being overhauled before being accepted. Second hand gear bought by the owner shall be paid for by the crew at the price actually paid. The price charged the crew for replacing lost and condemned gear shall not be more than the purchase price of the new gear on the day the settlement for the trip is made, irrespective of whether the near gear is of higher or lower quality than the gear being replaced. Should an owner change from light to heavy gear or space the hook closer together, he shall pay the difference in cost. Likewise, if the case is reversed, the owner shall be entitled to the difference. Fishing gear shall not be used as ship's gear. Sufficient spare hooks (including gangings, tar and twine) shall be furnished by the vessel and kept up to the crew. A complete gear list including gear bought to replace condemned and lost gear, shall be made at the start of the season and at the end of the season. The gear list at the end of the season shall be signed

by the master and delegate and contain names of crew members. One copy of the gear list shall be turned in to the Union.

11. The crew shall pay their share of the watchman's fees. If a vessel is delayed by repairs or neglect of the master or owner, the owner shall pay for the watchman. If any crew member delays the vessel through neglect, such crew member shall pay for watchman. If no watchman is obtainable, the master shall hire one of his crew for this purpose. The master and delegate shall determine if a watchman is needed in small outside ports.

12. The cost of a life raft and survival suits shall be paid for by the vessel owner and the cost of inspection and maintenance of the life raft shall be deducted from the gross stock of each vessel inspected. The standards shall be agreed upon by the Union, Association, and inspector. It is required by the Association and Union that survival suits for crews and EPIRBs be placed on all vessels. Those crews and boat owners who purchased suits during the 1978 fishing season should make resettlements to reflect this paragraph. All survival suits acquired under agreement of this paragraph shall remain on board the fishing vessel at all times.

13. The owner shall furnish a medicine chest. It shall then be kept up by the crew. The master and delegate shall determine what is needed each trip.

14. The crew shall not pay any part of tow bills. In cases where income from tows is received, the vessel shall receive 40% boat share from the income after expenses incurred as a result of towing are deducted.

15. The crew shall not pay for grease or any other preparations used for preservation of the anchor cable or anchors.

16. The crew shall not pay for any loss to the fitout due to leaky oil tanks, leaky water tanks, leaky pipe lines, or breakdown of propelling machinery when the loss occurs after the attention of the owner has been called to such defective equipment and repairs are not made upon the vessel's return to a port where repairs can be reasonably made.

17. The crew shall not be charged for any item not mentioned in this agreement until the item has been approved by the Union.

18. Settlement shall be made and shares distributed at the end of each trip, except that settlement may be deferred in out-of-way ports upon agreement between the master and crew, and except products sold through a cooperative approved by the Union and Association. Settlement shall be made between the master and his agent and the crew. Delegate shall be present at time of settlement. Itemized bills or receipts shall be produced at time of settlement. A copy of the settlement shall be available aboard the ship.

19. The Union shall urge its members to pay their share of any hole trip. After bills are paid, hole bills shall be paid as follows: when share is \$25.00 or less, nothing shall be taken out; when share is over \$25.00, one-half of the amount from \$25.00 to the full share shall be taken out. Hole bills are not collectible;

(1) When men are discharged through no fault of their own immediately after a trip when a hole bill is made.

(2) When vessel goes into some other trade or goes seining immediately after a trip when a hole bill is made and men are discharged by the captain for reasons other than legal ones.

(3) Where the vessel is a total wreck.

(4) Where repairs are needed after an accident and the men are not wanted back when the repairs are completed.

20. Notice shall be given at time of settlement when a captain decides to discharge any member of the crew or any member of the crew decides to leave.

21. The owner shall give immediate notice to his crew whenever his vessel is scheduled to be diverted from halibut or black cod fishing to go on a charter or change to another type of fishing. Crew members shall likewise give immediate notice when they are scheduled to leave the vessel before the end of the season. This notice shall be given, if possible, before the opening of the season. The crew shall receive their share of all stores on board when a vessel is sold or goes on charter or into another trade other than halibut or black cod fishing. When such vessels return to halibut or black cod fishing, the crew shall assume all usable stores on board.

22. The crew agrees:

(1) To do all the work necessary to keep the gear in good condition and rig new gear to replace condemned or lost gear, without any charge to the owner.

(2) To put gear aboard at start of season and put away the gear at the end of the season, or when vessel leaves halibut fishery, within three (3) days (excluding Sundays and holidays) after the fish is unloaded or vessel arrives in port. Failure of a crew member to perform these duties shall result in a charge as provided in paragraph 23.

(3) To wash fish hold and keep living quarters in a clean and sanitary condition. The owner may deduct \$5.00 per man per trip during the season, and hire someone to clean the living quarters.

(4) To clean all paint work inside the bulwarks with some cleansing solution each trip going home, when vessels are to paint up, and at the end of the season.

Paint work shall mean: pilot house, inside railings, baiting benches, skylights, hatches, checkerboards, lower part of masts, gaff, boom, and outside railings above guard within reach from deck.

(5) To discharge fish from tackle to scales and head fish.

(a) One member of the crew, approved of by the master and crew, shall attend to the weighing of the fish and he shall assume all responsibility in the master's absence.

(b) All crew members shall be present when fish are being discharged. Any crew member who is intoxicated or absent shall be replaced only at the discretion of the skipper. The opinion of the master and one crew member shall be sufficient to determine intoxication. Any crew member who leaves the vessel without justifiable cause upon the vessel's return to port duties required may be fined a portion of the trip as defined in paragraph 23. A vote of the crew is required to determine justifiable cause for the purposes of establishing a fine. The fine shall be divided among those who perform the work of the missing crewman. A minimum fine of \$75.00 shall be levied. A crew member who desires to lay off shall notify the master and a substitute shall be hired. When a substitute is hired, he shall do all the work required of the crew member until the vessel is tied up. If the substitute is hired for discharging fish, he shall also assist in moving the vessel to its place of tie-up. Rates for heading and unloading shall be \$50.00 for up to 25,000 pounds, plus \$1.25 per 1,000 pounds for the amount over 25,000 pounds in any load. Crew member that is replaced shall bear the cost. If an extra man is hired the cost shall be a Gross Stock expense.

(6) To load supplies. A sufficient number of the crew shall be present when loading supplies. Cooks must be present when loading groceries.

(7) To man vessels from port of sale to vessel's home port. When



a crew member quits or in case where a crew member's home is at a place other than the vessel's home port and he wishes to leave the vessel, he may be charged, at the crew's discretion, \$8.00 per hour for wheel turns. This sum when collected shall be paid to the man taking his place or among the members of the crew doing his work. In event settlement is made prior to leaving for vessel's home port, the estimated cost of wheel turns shall be deducted from the settlement.

(8) While the crew is performing these duties, the captain shall be free to perform such other duties as may be required of him as master of the vessel.

23. Any crew member who delays a vessel shall be subject to discharge. Any crew member negligent, absent, or intoxicated, in his duties outlined in paragraph 22, may, at the crew's discretion, be charged a minimum of \$25.00 for each day he fails to perform his work, but not to exceed one day's fraction of the trip. (Example - on a ten-day trip, with a man's share of \$300.00, the charge could not exceed \$30.00 per day. Computation of days shall begin when loading of supplies is begun and shall end when vessel is tied up following discharge of catch.) Such charges when collected shall be paid to the substitute or distributed among the other members of the crew.

24. Any crew member who leave the vessel, without justifiable cause, at any time during a trip shall not be entitled to any share of the proceeds of the trip. Any crew member who leave the vessel with justifiable cause shall receive full share from the proceeds of the trip unless he leaves the vessel prior to its departure from the final port before reaching the fishing grounds. In the latter case, he shall receive either \$8.00 per hour for time he spent in taking wheel watches, or a proportion of a man's share based upon the number of days he was on board the vessel related to the total number of days involved in the trip computed as per example in paragraph 23, whichever of the two totals is the lesser. The payment to such a crew member shall be charged as Gross Stock Expense.

25. A delegate, who is a paid up member of the Union, shall be elected on each vessel by the crew members (excluding owner). He shall check up bills with supplies received and see that all members of the crew are members of the union in good standing according to paragraph 1 of this agreement. He shall check up on gear each trip. He shall be present at time of trip settlement and see that settlement is made according to this agreement. He shall receive a copy of the settlement and see that it is available on board the vessel.

26. The vessel owner and/or master agrees that vessels will be equipped with adequate life saving equipment and escape hatches as recommended by the Union and Association.

27. The Association and Union agree to enter into a supplement to this agreement to cover lay-up program and lay-up fund.

28. All fish shall be sold on a competitive market except for such fish or fish products as may be marketed through any cooperative approved by the Association and Union. There shall be two grades of halibut. There shall be one grade of all other varieties of fish. All fish not sold according to the above, and all culls, shall remain the property of the owners and fishermen.

29. There shall be no discrimination against any Union member because of Union activity or because of a dispute over the working agreement or any other agreement pertaining to fishing until such dispute has been finally settled between the Association and Union. Any dispute between the captain or owner and crew that cannot be settled on board shall be referred to the Association and Union for adjustment

immediately upon arrival in port where the Association and Union have offices.

30. Any dispute including disputes over shares, that may arise between the captain or owner of a vessel and a member of the crew of the vessel shall be first referred by the crew member to the delegate aboard the vessel. The delegate and the captain or owner shall attempt to settle the dispute on board. Any dispute between the captain or owner of the vessel and a member of the crew that cannot be settled on board or any other dispute arising under this agreement shall be referred to a hearing committee composed of equal numbers of representatives of both the Association and the Union for determination within 30 days after the completion of the last trip of the vessel for the season. The Association and the Union shall each have one vote in the hearing committee. The hearing committee shall investigate the circumstance of the dispute and make a final and binding determination. If the hearing committee is unable to agree on the resolution of the dispute, at the request of either the Union or the Association the dispute shall be referred to arbitration. The arbitrator shall hear and determine the facts of the dispute and render a decision under this Agreement in writing within 30 days of having the dispute referred to him. The arbitrator's decision shall be final and binding on all parties. The arbitrator shall be selected by agreement between the Association and the Union. If the Association and the Union cannot agree upon an arbitrator, the arbitrator shall be selected by alternately striking names from a list of five arbitrators to be provided by the Federal Mediation and Conciliation Service. Any parties involved in any grievance hearing shall be discouraged by both the Union and the Association from the use of an attorney for representation in that hearing.

31. Subject to the provisions of paragraph 32, this Agreement shall be in full force and effect for an Initial Term until January 1 of the ninth year following implementation of Individual Fishing Quotas, and continue thereafter unless notice in writing is given by either party desiring to change or terminate any portion of this Agreement. PROVIDED, HOWEVER, that if Individual Fishing Quotas are not implemented by the end of 1997, the parties agree to renegotiate the term of this Agreement. In the event of such renegotiation, the term of the Agreement shall not expire prior to January 1, 2003.

Any notice to change or terminate any portion of this Agreement, shall be given during the last year of the Initial Term of this Agreement, or during any subsequent year, but no less than thirty (30) days prior to January 1 of the year in which a change is proposed, and shall specify the exact paragraphs for which changes or termination are desired. The party upon whom the notice is served shall have until December 18th following receipt of the notice in which to specify the exact paragraphs which it wishes to change or terminate, and subsequent negotiations shall be confined exclusively to the paragraphs upon which notice is given by both parties. Negotiations shall commence as quickly as possible following receipt of the thirty (30) day notice.

32. In the event that the state or federal legislation or regulations are adopted which materially either change the status of crewmen, or affect the financial management of the vessel, then the Set Line Agreement will be subject to being reopened by notice given not less than thirty (30) days prior to the end of any year in which such legislation or regulations are adopted. For purposes of this paragraph, legislation or regulations are material if they significantly change the financial obligations of the owner to crewmen, such as by changes to the Jones Act, the general maritime law relating to maintenance and cure, or by the adoption of a mandatory health care requiring payments by the owner

Table 1. Halibut IFQs ex-vessel value – 10,000 pounds caught vs. 7,200 pounds delivered as H&G fish MTC

	lbs. Hal	Price/lb	Value
IFQ Halibut	7,200	\$3.00	\$21,600

Table 2. Halibut mortality ex-vessel value for underutilized flatfish – 10,000 pounds whole fish

Species	Hal rate	Mort rate	Flatfh lbs.	Price/lb	Value
Deep Flats	0.059	0.6	282,486	\$0.20	\$56,497
Shal Flats	0.079	0.68	186,150	\$0.20	\$37,230
Flathead Sole	0.05	0.65	307,692	\$0.20	\$61,538
Arrowtooth	0.049	0.56	364,431	\$0.05	\$18,222
Rex Sole	0.051	0.59	332,336	\$0.20	\$66,467

PRR\* - Product Recovery Rate

Assume major product for Halibut is shipped as Fresh Headed and Gutted fish

Assume major product for flatfish is shipped frozen shatter pack fillets

Table 3. Net benefit to Community – labor cost for work force vs. trawl flatfish catch

Species	purchased		Finish prdt lbs.	Labor cost lbs.	Total Labor cost
	lbs.	PRR*			
IFQ Halibut	7,200	n/a	7200	\$0.10	\$720
Deep Flats	282,486	0.22	62147	\$0.60	\$37,288
Shal Flats	186,150	0.22	40953	\$0.60	\$24,572
Flathead Sole	307,692	0.22	67692	\$0.60	\$40,615
Arrowtooth	364,431	0.22	80175	\$0.60	\$48,105
Rex Sole	332,336	0.22	73114	\$0.60	\$43,868

Table 4. Total value – ex-vessel and labor – excludes overhead cost benefits such as electricity, water, taxes, market value to processors, etc.

Species	ex-vessel value	labor costs	Total value
IFQ Halibut	\$21,600	\$720	\$22,320
Deep Flats	\$56,497	\$37,288	\$93,785
Shal Flats	\$37,230	\$24,572	\$61,802
Flathead Sole	\$61,538	\$40,615	\$102,154
Arrowtooth	\$18,222	\$48,105	\$66,327
Rex Sole	\$66,467	\$43,868	\$110,336

To: NORTH PACIFIC

Terry Haines  
0-5

# FISHERY MANAGEMENT COUNCIL

RE: GOA GROUND FISH RATIONALIZATION

FROM: FISH HEADS - AN ADVOCACY GROUP FOR  
SUSTAINABLE FISHERIES THAT CONTINUE TO FUEL  
OUR COASTAL COMMUNITIES - -

## FISHERMAN'S CO-OP

Fish Heads asks that the Council consider recognition of a Fisherman's Co-Op comprised of identified skippers and crew who can show an historical dependence on the rationalized resource.

### STEP ONE: IDENTIFICATION OF SKIPPERS AND CREW:

The Crewman's Association, or similar entity, would embark on a data collection program to identify qualifying skippers + crewmen.

### STEP TWO: CO-OP FORMATION:

Qualified skippers and crew would be invited to join a Co-Op structured similarly to one used by the Cape Cod Commercial Hook Fisherman's Association, which they use for allocation of day of fishing from the New England FMC.

### STEP THREE: ALLOCATION TO CO-OP:

The NPFMC would then be petitioned for direct allocation as a sector under Alternative 3 GOA Rat.

Global Seafoods North America LLC  
11100 NE 8 Th Street  
Bellevue, WA 98004 USA  
Phone: 425 45137 05  
Fax: 425 45110 67  
www.globalseafoods.com



Global Seafoods North America

NPFMC Meeting December, 2005

Madam Chair and Council Members,

I am Oleg Nikitneko, President of Global Seafoods North America.

As we have testified before, Global Seafoods has a large seafood processing plant in Kodiak.

We believe that it is important for you to try to protect the economic interests of fishermen, fishing vessels, processing companies and the Kodiak community when you design Gulf of Alaska groundfish rationalization.

We also believe that it is important for you to protect the interests of Global Seafoods. Global Seafoods is an important part of the Kodiak community. We have operated in Kodiak for 6 years. We have processed more than 15% of the total landed groundfish in the Gulf of Alaska in 2005. We provide good markets to many fishermen. We provide good jobs to many processing workers. We buy many services and products from many Kodiak businesses.

We are disappointed that you did not listen to us when we asked to be part of the Rockfish Pilot Program.

We wish to be included in the Gulf of Alaska groundfish rationalization program. We wish to continue to be a good and competitive market for fishermen. We wish to continue to buy groundfish. We wish to continue to be a good employer of Kodiak processing workers. We wish to continue to purchase services and products from Kodiak businesses. We wish to continue to support the Kodiak community.

Less than 12 months ago section 2.3.1.2 included an option that allowed us to be a licensed processor in Gulf of Alaska groundfish rationalization by including the option of using any three years during 2000-2003. This option disappeared.

We recently asked the AP to remove all options in section 2.3.1.2.1, and use only a new option of any three years of 2000 to 2004. We ask you to do the same.

We recently asked the AP to make the linkage to the communities, and not to the processors. We ask you to do the same.

We advocate replacing the processor linkage with a system that links fishermen and their catch history to their historical region. This will benefit fishermen and communities more than the current proposals by maintaining competition within the processing sector.

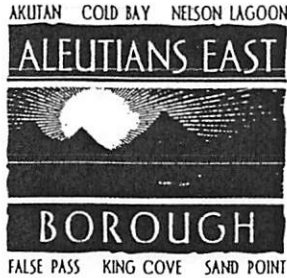
Linking fishermen to processors cancels competition.

We believe that the current proposals to limit processors, and to require linkages of fishermen to processors, are anticompetitive and possibly illegal.

We previously asked you to keep an open class of processors, but no one was listening. We now ask you to include a license for Global Seafoods so that we can continue to process groundfish in Gulf of Alaska groundfish rationalization.



Oleg Nikitenko



RESOLUTION 06-14

A RESOLUTION OF THE ALEUTIANS EAST BOROUGH REQUESTING THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL (NPFMC) TO POSTPONE ACTION ON GULF RATIONALIZATION UNTIL A FULL REVIEW OF THE EFFECTS OF CRAB RATIONALIZATION ON COMMUNITIES HAS BEEN COMPLETED.

WHEREAS, the NPFMC is considering several alternatives regarding rationalizing the groundfish in the Gulf of Alaska; and

WHEREAS, the United States Congress is considering changes to the Magnuson-Stevens Act that may affect the options available to the Regional Councils regarding new fishery management plans; and

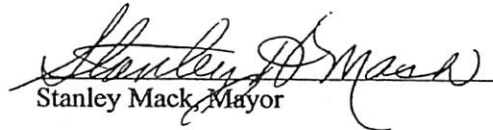
WHEREAS, the communities in the Aleutians East Borough are 99% dependent upon the fisheries for their economic health and their sustainability as communities; and

WHEREAS, communities in the Gulf of Alaska, including Kodiak, Homer and King Cove are experiencing unanticipated negative impacts as a result of Crab Rationalization including loss of crew jobs, decreased business activity and underutilized public facilities such as boat harbors, schools and transportation infrastructure; and

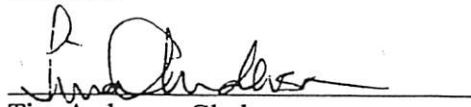
WHEREAS, the City of King Cove, the Aleutians East Borough, the City of Kodiak and the Kodiak Island Borough are contracting with the University of Alaska, Institute of Social and Economic Research (ISER) for an independent assessment of the socioeconomic impact of Crab Rationalization on their communities.

NOW THEREFORE BE IT RESOLVED, by the Aleutians East Borough Assembly, that the North Pacific Fishery Management Council postpone action on Gulf of Alaska rationalization until the council and the communities thoroughly review the full impacts of the crab rationalization.

Adopted this 6<sup>th</sup> day of December, 2005.

  
 Stanley Mack, Mayor

ATTEST:

  
 Tina Anderson, Clerk

C-5

Introduced by:	Mayor Selby
Requested by:	Assembly
Introduced:	12/01/05
Amended:	12/01/05
Adopted:	12/01/05

**KODIAK ISLAND BOROUGH  
RESOLUTION NO. FY2006-19**

**A RESOLUTION OF THE KODIAK ISLAND BOROUGH ASSEMBLY  
REQUESTING NORTH PACIFIC FISHERY MANAGEMENT COUNCIL'S  
CONSIDERATION OF COMMUNITY CONCERNS IN THE PENDING  
GULF OF ALASKA RATIONALIZATION PROGRAM**

**WHEREAS**, the harvesting and processing sectors of the Kodiak Island fishing community are substantially involved in and substantially dependent upon the Gulf of Alaska groundfish fisheries; and

**WHEREAS**, Kodiak Island's economic and social health is inherently dependent on the community's sustained participation in all aspects of the Gulf groundfish fisheries; and

**WHEREAS**, the Kodiak Island Borough is dependent on groundfish through investments in shore based processing facilities, support infrastructure, and catcher vessels as well as the economic base of the value of fish; and

**WHEREAS**, the North Pacific Fishery Management Council has developed a suite of fishery allocation alternatives for the Gulf of Alaska groundfish fisheries, and is working toward adoption of a preferred alternative for implementation; and

**WHEREAS**, allocating exclusive harvesting and/or processing privileges promotes consolidation in the fishing fleet and the processing sector, which may improve efficiency, but also results in skippers, crew members and processing workers bearing the costs of consolidation without fully sharing in the related benefits; and

**WHEREAS**, fishery rationalization may create opportunities and incentives to produce more and higher value products, it also changes the distribution of fishery revenues among participants by altering the balance of market power between fishermen and processors, with potentially disruptive effects on the communities in which they live; and

**WHEREAS**, by awarding harvesting and/or processing privileges, fishery allocations make possible orderly harvesting and processing, but also facilitate migration of landings to communities with infrastructure advantages (such as road system access) and create barriers to entry for later generations of fishery participants; and

**WHEREAS**, it is essential that the potential adverse affects of Gulf groundfish rationalization be identified and analyzed, and that program adjustments be made to mitigate the potential adverse effects of Gulf groundfish rationalization on Kodiak Island and its residents prior to implementation; and

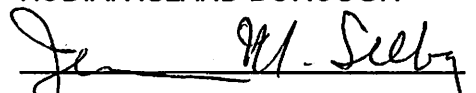
**WHEREAS**, Kodiak is the largest fishing port in the Gulf of Alaska and has been one of the top four fishing ports in the nation every year for more than 25 years;

**NOW, THEREFORE, BE IT RESOLVED, BY THE ASSEMBLY OF THE KODIAK ISLAND BOROUGH THAT** the North Pacific Fishery Management Council (the "Council") is hereby requested to take the following actions in connection with its development of a Gulf of Alaska groundfish rationalization program:

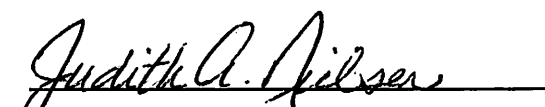
1. Complete the Council's review of the Bering Sea crab rationalization program to enable the public to evaluate and comment on the impacts of crab rationalization and to enable the Council to make appropriate adjustments to the Gulf rationalization program in response.
2. Thoroughly analyze each alternative being considered by the Council before eliminating any of the alternatives, to provide the public with the opportunity to compare the effects of the various alternatives on harvesters (including skippers and crew members), processors (including workers), fishing support services, and Gulf fishing communities.
3. Include limits on harvesting consolidation through vessel use caps that apply without exemption, and that are calculated to sustain skipper and crew employment opportunities and compensation.
4. Develop and bring forward for consideration an additional alternative which includes no processor shares, linkages or privileges of any kind. For alternatives already being considered, include measures to maintain a diverse, competitive processing market, by providing a substantial pool of groundfish privileges for each sector that can be harvested without penalty and are not subject to processor linkage or processor closed class delivery requirements. This should include phasing out of the off shore processing sector.
5. If processing privileges are included, limit consolidation of such privileges through processor and facility use caps.
6. Designate Federal harvesting privileges by region to reflect landing patterns similar to those occurring prior to program adoption, and require that fish harvested under such privileges be landed in their designated region.
7. Include a reasonable groundfish allocation which may be harvested and processed without holding any Federal or State dedicated access privilege, subject to restrictions that the State of Alaska may deem necessary to maintain the entry level character of such allocation.
8. Include a community fisheries quota program that provides an opportunity for small Gulf coastal communities to enhance their residents' participation in the Gulf groundfish fishery, under the conditions that the allocation to such program does not disrupt other Gulf of Alaska fishery dependent communities by displacing their fishermen, is required to be harvested by residents of the eligible communities, and requires that harvests made under such program be delivered on shore within the region of their allocation.
9. Include a community purchase program that provides Gulf coastal communities with the opportunity to maintain participation by their residents in the Gulf groundfish fishery by acquiring harvesting privileges for use by their residents, under the conditions that the Kodiak Island communities are eligible communities, and such program includes reasonable limits on the amount of harvesting privileges that any single eligible community may hold.

**ADOPTED BY THE ASSEMBLY OF THE KODIAK ISLAND BOROUGH  
THIS FIRST DAY OF DECEMBER 2005**

KODIAK ISLAND BOROUGH

  
\_\_\_\_\_  
Jerome M. Selby, Borough Mayor

ATTEST:

  
\_\_\_\_\_  
Judith A. Nielsen, CMC, Borough Clerk