

Mr. Dan Hull, Chair  
North Pacific Fishery Management Council  
605 W 4<sup>th</sup> Ave., Suite 306  
Anchorage, AK 99501

RE: Request for NPFMC to recommend to Secretary Pritzker to implement an emergency action to reopen the Gulf of Alaska non-pollock groundfish fishery as soon as possible in 2015

May 26, 2015

Dear Chair Hull,

Please accept this recommendation and supporting justification on behalf of the Alaska Whitefish Trawlers Association (AWTA), Alaska Groundfish Data Bank (AGDB) and the Midwater Trawlers Cooperative (MTC). Collectively these three organizations represent the vast majority of trawl catcher vessels that have delivered non-pollock groundfish into the community of Kodiak for many decades and all Kodiak trawl dependent shorebased processors. These vessels and processors are all directly impacted by the premature closure on May 3rd to the non-pollock, non-rockfish catcher vessel groundfish fishery as a result of recently implemented Amendment 97 to the Gulf of Alaska Groundfish FMP and the National Marine Fisheries Service (NMFS) projection that the 2,700 Chinook hard cap for the non-rockfish catcher vessel sector had been reached. The closure has stranded approximately 19,511 metric tons (mt) of groundfish harvest assuming similar harvest patterns as occurred in 2014. Based on average aggregate 2011 wholesale value per metric ton for non-rockfish program catch of all species groups (Pacific cod and flatfish) of \$1,071 per mt quoted in the final Environmental Assessment / Regulatory Impact Review (EA/RIR) implementing Amendment 97, the estimated loss to harvesters and processors would be \$21 million. This estimate excludes any multiplier of the economic impact of dollar exchanges within the community of Kodiak so does not include the negative impacts to secondary and tertiary support businesses as well as others within the community. Obviously, in today's challenging fiscal climate this type of negative economic impact can destroy individual businesses and devastate rural communities.

New genetic information now available demonstrates that the Chinook salmon intercepted in these groundfish fisheries are primarily hatchery fish, not the Alaska wild stocks that were thoroughly analyzed in the EA for protection under Amendment 97 and the Alaska wild stocks of concern discussed during the deliberations by the Council at the time of final action.

This premature closure will cause an incredible amount of real economic pain for minimal to zero actual conservation gain. We respectfully request that the Council recommend the Secretary of Commerce promulgate emergency regulations to make more Chinook salmon available to the non-pollock, non-rockfish catcher vessel fishery sector to reopen this fishery as soon as possible in order to mitigate the pending economic catastrophe that currently faces the Gulf of Alaska fishermen and their crew, seafood processors and plant workers, secondary and tertiary support businesses and the community of Kodiak. As described below we believe the required criteria for emergency action has been met and the requested action complies with the Magnuson Stevens Act national standards.

### Emergency Action Criteria

National Marine Fisheries Service (NMFS) policy guidance for the use of emergency rule states, “The preparation or approval of management actions under the emergency provisions of Section 305(c) of the Magnuson-Stevens Fishery Conservation and Management Act should be limited to extremely urgent, special circumstances where substantial harm to or disruption of the resource, fishery or community would be caused in the time it would take to follow standard rulemaking procedures.”

Further, NMFS interpreted Congress’s intent that emergency authority be available to address conservation, biologic, economic, social and human health emergencies. This particular situation in the Gulf of Alaska is an economic and social emergency.

Unforeseen events and recently discovered information help to inform the justification for emergency action. Failure to act will cause substantial economic and social harm to the Gulf of Alaska non-pollock, non-rockfish groundfish catcher vessel sector, processors and extensive disruption to the community of Kodiak.

The first unforeseen event was the sudden attainment of the Chinook hard cap, basically as the result of a NMFS observer sample that when extrapolated out to the fleet essentially became simultaneous “lightning strikes” of Chinook that shut the fishery down with virtually no warning. It was known that the western Gulf had taken approximately 40% of the available non-rockfish non-pollock Chinook during their A season Pacific cod fishery, and subsequently central Gulf vessels targeting flatfish were cautious in their activities regarding salmon interaction; the immediate closure gave the fleet zero time to react. While the EA/RIR did analyze the possibility of an early closure of the fishery with the attainment of a hard cap, the analysis in no way envisioned or modeled a sudden shut down that prevented participants from utilizing whatever avoidance tools and incentives were available to them to alter their Chinook interactions to prolong the fishery. The EA/RIR talks at length about the ability of those fisheries that are rationalized (rockfish program) to adjust their fishing strategies and avoid prohibited species catch (PSC) to stay under the Chinook salmon hard cap. The analysis even goes as far as to suggest that since many of the harvesters in the rockfish program also participate in the non-rockfish sector, they would naturally be sharing information and altering behavior based on the available information. Unfortunately, the available information on Chinook salmon interactions for the Central Gulf came suddenly with no time to react. Because it was too late for anything else the only thing that was communicated and shared between harvesters was the fact that the fishery was prematurely closed.

Another unexpected occurrence is the unlikely event that enough Chinook savings from the rockfish program will be rolled over in October to reopen the currently closed non-rockfish catcher vessel fishery. The final EA/RIR proposes mitigating any non-pollock, non-rockfish closure or threatened closure with the rollover of Chinook salmon savings from the rockfish program in October. This rollover is touted as a safety blanket of sorts. Unfortunately, the actual effectiveness of the Chinook salmon savings rollover to lessen impacts in the non-pollock, non-rockfish catcher vessel program was not fully vetted in the analysis and it would appear that this scenario is not a life raft in the case of the current closure. The final EA/RIR never stated or analyzed the fact that any Chinook salmon savings within the rockfish program would have to first be applied to any overages sustained in the non-rockfish catcher vessel sector before any reopening of a closed fishery could take place. As of now we know that there is a projected overage

in the non-rockfish catcher vessel program of 215 Chinook that will need to be accounted for within the overall hard cap prior to any consideration of reopening the fishery. Further complicating the issue, 150 Chinook salmon need to be held back within the rockfish program to fund this fishery through November 15<sup>th</sup>. This built in “safety net” of a Chinook savings rollover will, in all actuality, not be available to the non-pollock, non-rockfish groundfish catcher vessel sector this year.

There are two recently discovered circumstances that justify taking emergency action. The first is new genetic stock of origin information on the Chinook salmon taken as bycatch in the Gulf of Alaska groundfish fisheries. The second piece of new information is the amount of Chinook salmon intercepted in the Western Gulf Pacific cod fishery that was not projected by the Amendment 97 analysis or frankly, even envisioned.

The genetic disposition of salmon intercepted in the Gulf of Alaska demonstrate that 97% of these fish primarily originate from areas where there is high hatchery production, British Columbia, the Pacific Northwest, and Southeast Alaska, and that Alaskan wild stocks of concern are virtually unaffected by the trawl bycatch in the Gulf of Alaska. This information became available at the October 2014 NPFMC meeting with additional updates at the December 2014 and April 2015 Council meetings. The EA/RIR clearly states throughout the document and in particular in sections 3.3 and 4.5 that the scientific information to make the connection between wild Chinook stock savings, and the proposed PSC reduction action either was unavailable or simply did not exist beyond an educated guess. Even more troubling is new information regarding abundance and productivity trends for Chinook salmon taken as bycatch in the GOA trawl fisheries. According to the Alaska Department of Fish and Game publication “Summer 2014 Chinook News”, the southern stocks of Chinook salmon (southern British Columbia, Washington, Oregon, and California) have been exhibiting peaking trends from 2010 to present due to favorable marine conditions meaning that there is high survivorship of hatchery fish released in the marine environment from these regions.

The amount of Chinook salmon bycatch taken by the WGOA non-pollock catcher vessel sector was not projected and exceeded estimates from the final EA/RIR. The majority of the WGOA trawl sector is made up of vessels under 60 feet in length and they did not carry observers prior to 2013 (Amendment 76). The EA/RIR analyzed the time period from 2003 to 2011 (Table 4-35) when very little observer data was available for this sector to determine their historical Chinook salmon usage. According to the EA/RIR the average Chinook usage for this sector was 63 fish with a high of 201 fish and a low of zero fish over the historical time period. During the 2015 A season WGOA trawl cod fishery, the catcher vessel sector Chinook salmon bycatch estimate was 1,057 Chinook – 17 times the average catch and 5 times the historical high catch.

The EA/RIR envisions a worst-case scenario for a potential early closure in the Gulf of Alaska non-pollock, non-rockfish trawl catcher vessel sector equating to the stranding of 22,000 mt of fish left unharvested equal to approximately \$28.5 million in wholesale value.

Table 1 lists the amount of CGOA flatfish and catcher vessel trawl sector cod quota remaining as of May 16<sup>th</sup>.

**Table 1: Remaining 2015 CGOA flatfish and catcher vessel trawl sector cod quota (mt)**

Species	2015 Quota	Annual catch 5/16	Remainder
CV Trawl cod*	17,181	8,083	9,098
Arrowtooth	75,000	9,449	65,551
Flathead Sole	15,400	1,009	14,391
Rex Sole	5,816	1,102	4,714
Deep Flatfish	3,689	50	3,639
Shallow Flatfish	19,297	852	18,445
Total	136,383	20,545	115,838

\*excludes RP cod allocation

**Table 2. 2014 CV sector retained CGOA Flatfish harvests (mt) from May 3<sup>rd</sup> to Dec 31st**

Species	3-May-14	31-Dec-14	Remainder
Arrowtooth	4,597	10,376	5,779
Flathead Sole	540	1,981	1,441
Rex Sole	1,256	1,892	636
Deep Flatfish	35	162	127
Shallow Flatfish	481	2,911	2,430
Total	6,909	17,322	10,413

Probably a more realistic estimate of foregone harvests for flatfish is displayed in Table 2. The catch table shows actual retained flatfish catches from May 3, 2014 to Dec 31, 2014 for the catcher vessel sector (all gear types). It should be noted that virtually all retained catches are taken by trawl gear. With regards to catcher vessel trawl Pacific cod catches it is fair to assume that the entire available quota (9,098 mt) would have been taken by the sector. In 2014, the trawl catcher vessel sector closed on October 17<sup>th</sup> when the available quota had been reached. While NMFS has the ability to roll cod to other harvesting sectors in the CGOA, the likelihood of significant harvests by other sectors occurring is minimal this year. Presently there are large amounts of unharvested cod across multiple federal fishery sectors from the A season (Jan 1 to June 10) along with the unharvested Kodiak district state jig cod quota.

Thus a conservative estimate of foregone harvests is 10,413 mt of flatfish and 9,098 mt of Pacific cod for a total lost harvest amount of 19,511 metric tons. Based on the aggregate 2011 average wholesale value per metric ton for non-RP catch of all species groups used in the EA (Pacific cod and flatfish) of \$1,071 per metric ton, the estimated wholesale value loss to the harvesters and processors would be \$21 million. Both estimates of tonnage and wholesale value are an underestimate of losses since incidental catches of other valuable groundfish species, such as skates, rockfishes and sablefish, caught incidentally within the flatfish and cod trawl target fisheries are not included. This stated economic impact represents the harvester's and processor's loss and exclude any economic multiplier effect in the Kodiak community which again suggests the economic impact is understated.

The EA/RIR that the Council used to inform the Amendment 97 decision underestimates the impacts of a premature closure to the trawl catcher vessel sector on the community and plays down the fact that a closure could occur by promoting the rockfish program rollover and incentive buffers as mitigating factors to any projected or actual closure. The EA/RIR also touts that the Council's final preferred

alternative (FPA) is not as low as it could have been (FPA of 7,500 versus option of 5,000 fish) and that this approach strikes a balance between reducing bycatch to the extent practicable and the risks of premature closure and the associated impacts to the directed target fisheries. Further, the analysis suggests that participants will be aware of the fact that the fishery could close and that this will provide a sufficient incentive for the fleet to communicate and share information as well as alter their fishing behavior. Unfortunately, as described above, the information that the Chinook catch was approaching the cap was not able to be communicated to the fleet in a way that would allow them to alter their behavior so this assumption while theoretically appropriate is, in reality, seriously flawed. The EA/RIR also points out repeatedly that the impact analysis is retroactive and hence inherently imprecise as future variations of the target stocks and amount and location of PSC is unknown and has varied greatly in past years.

The only Alaskan community affected by the present closure is the community of Kodiak, since the Kodiak based trawl fleet is the only non-pollock non-rockfish trawl catcher vessel fleet that operates after May in the Gulf of Alaska. Obviously the harvesters and processors engaged in the non-pollock, non-rockfish trawl sector were immediately impacted by the closure. In addition to the harvesters and their crew and seafood processors and their plant workers, the secondary and tertiary support businesses will also be negatively impacted. The Council did not consider losses to support businesses and community infrastructure that support the trawl fishery, even assuming a very small economic multiplier effect it is clear that the Kodiak community will suffer greatly from the losses associated with the closure. Several fishing vessels will sit idle not having other harvesting opportunities to fill the void left by the closure. The significant foregone revenue to vessels puts owners in the position of delaying maintenance and other needed services – impacting not just those businesses that provide the services, but potentially resulting in safety issues for the vessels. Processors will lose market share in particular for flatfish species that will go unharvested. Several Kodiak processors have worked diligently to develop new finished products types for Arrowtooth Flounder which can only be produced by shore based processors; these new markets will go unfilled for the remainder of 2015. Once market share is lost it is extremely difficult to get back especially when competing in the global seafood market. Several Kodiak processors are heavily dependent on trawl flatfish catches; one in particular does not process salmon so is heavily dependent on flatfish processing during the summer months.

The near year-round nature of the trawl fleet allows the processing plants to operate throughout the year and allows the community to maintain a resident processing workforce that would not otherwise be possible given the seasonality of other fisheries, such as salmon, fixed gear groundfish and herring fisheries. Without trawl fisheries to maintain an ongoing flow of work through the plants the processing workforce will become transient in nature, impacting overall population, real estate tax, student population and ultimately have indelible impact on the social fabric of the community. Clearly, the losses to Kodiak from the closure will be substantial, with detrimental social repercussions to the community and its residents.

#### Compliance with National Standards

As with any fishery policy or management measure incorporated into a fishery management plan, any emergency action must also comply with the MSA national standards. The action requested here is to move more Chinook salmon into the non-pollock, non-rockfish catcher vessel groundfish fishery so that the fishery may reopen and avoid stranding over 19,000 metric tons of fish worth over \$21 million dollars

causing extreme economic harm to fishery participants and support industries as well as causing major disruption to the community of Kodiak. Below we discuss in detail how this recommendation complies with each of the MSA national standards.

***National Standard 1: Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery for the U.S. fishing industry.***

Making more Chinook salmon available to the hard cap for the Gulf of Alaska non-pollock, non-rockfish catcher vessel groundfish fishery complies with National Standard 1 and allows the trawl catcher vessel participants the opportunity to achieve optimum yield (OY) from this fishery. If no salmon is made available and the fishery remains closed there is no opportunity to achieve OY. The current circumstances described in the section above make it extremely unlikely that there will be a rollover of fish October 1<sup>st</sup> from the catcher vessel Rockfish Program to the closed fishery. The amount of fish that would be necessary to cover the current overage and provide enough certainty to NMFS that they can effectively manage the fishery is highly unlikely. Even if there were limited amounts of fish rolled over, the large amount of total allowable catch (TAC) still available to be caught could not be effectively harvested in the remaining timeframe after October 1<sup>st</sup>.

The groundfish target stocks are healthy and TACs are set conservatively to ensure that no overfishing is occurring. There is also a predetermined incidental take statement (ITS) for an annual threshold amount of 40,000 Chinook salmon that can be taken in the GOA groundfish fisheries before a Section 7 consultation is initiated. Moving additional salmon into the non-pollock fishery will not jeopardize this upward threshold as Amendment 93 limits Chinook salmon PSC in the trawl pollock fishery to 25,000 fish and combined with the highest recorded salmon PSC in the non-pollock groundfish fisheries of 10,877 fish in 2010, the total amount of salmon potentially caught in the GOA would still come in under the 40,000 fish threshold.

Reopening this fishery by making more Chinook salmon available to the non-pollock, non-rockfish catcher vessel sector complies with National Standard 1, allows the fishery the opportunity to achieve OY which it would otherwise not have, and will provide the most benefit not just to the participants and the community of Kodiak, but to the nation as required by the MSA.

***National Standard 2: Conservation and management measures shall be based on the best scientific information available.***

The recommended action complies with National Standard 2 because the best scientific information shows that 97% of the Chinook bycatch is from areas with high Chinook salmon hatchery production (SE, BC, and the PNW), not Alaska wild stocks of concern. The EA/RIR used to inform the Council's decision on Amendment 97 did not contain this information because it was not yet available. NS2 requires fishery managers to utilize the best available scientific information and that information tells us that making available more Chinook salmon for the non-pollock, non-rockfish fishery will likely not impact the status of Alaskan wild salmon stocks of concern. While the national standard guidelines do not require a fishery management plan amendment every time new information becomes available, when that new information indicates something drastically different than what was used to inform the decision then

the action should be reconsidered. In the meantime, the best available scientific information demonstrates that making available more Chinook salmon to the catcher vessel hard cap will not further jeopardize the sustainability of wild Alaskan Chinook salmon stocks.

***National Standard 3: To the extent practicable an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination.***

The recommended action complies with National Standard 3 because no change to the management unit of the target groundfish fisheries is contemplated or recommended.

***National Standard 4: Conservation and management measures shall not discriminate between residents of different states. If it becomes necessary to allocate or assign fishing privileges among various U.S. fishermen, such allocations shall be:***

- (1) fair and equitable to all such fishermen***
- (2) reasonably calculated to promote conservation***
- (3) carried out in such a manner that no individual, corporation, or other entity acquires an excessive share of such privileges***

The recommended action complies with National Standard 4 because no direct allocation of any groundfish stock or salmon stock is being made to any individuals.

***National Standard 5: Conservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources; except that no such measure shall have economic allocation as its sole purpose.***

The recommended action complies with National Standard 5 because transferring more salmon to the catcher vessel hard cap will allow for the efficient and careful harvest of over 19,000 metric tons of groundfish, which are now stranded in the water. While economics is a large driver in requesting the recommended action, it is not the only consideration. Achieving OY as dictated by National Standard 1 and avoiding community disruption as required by National Standard 7 are paramount in the rationale for taking action.

***National Standard 6: Conservation and management measures shall take into account and allow for variations among and contingencies in fisheries, fishery resources, and catches.***

The recommended action complies with National Standard 6 in that the action is responsive to both unforeseen events and new information. The unforeseen events include the immediate closure of the fishery based on an extrapolated NMFS sample that literally became several lightning strikes of Chinook salmon and the inability of the rockfish program to provide enough Chinook savings that can be rolled over into the non-rockfish catcher vessel sector. The new information informing this recommendation is the large and unexpected catch of Chinook salmon in the WGOA Pacific cod A season fishery and the new genetic stock of origin information that shows that the Chinook salmon bycatch in Gulf of Alaska

groundfish fisheries are from areas with high hatchery fish production, not the wild Alaskan stocks of concern.

***National Standard 7: Conservation and management measures shall, where practicable, minimize costs and avoid unnecessary duplication.***

The recommended action complies with National Standard 7 because the action will not impose greater costs on the fleet or managers. Inaction imposes the greatest cost by preventing the potential to achieve OY.

***National Standard 8: conservation and management measures shall, consistent with the conservation requirements of the Magnuson-Stevens Act (including the prevention of overfishing and rebuilding of overfished stocks) take into account the importance of fisheries resources to fishing communities in order to:***

- (1) provide for the sustained participation of such communities; and***
- (2) to the extent practicable, minimize adverse economic impacts on such communities***

The recommended action complies with National Standard 8 and is one of the primary rationales for seeking an emergency action. As described in great detail in the previous section, Kodiak is the primary community directly affected by the closure. There is now and will continue to be disruption in the harvesting and processing sectors that will directly impact the larger community. Idle boats will cut loose crew that they are unable to pay. Loss of year-round product coming across the docks at the processors will result in lost work force and lost market share, both of which are difficult to regain. Inaction is in direct conflict with National Standard 8.

***National Standard 9: Conservation and management measures shall, to the extent practicable:***

- (1) minimize bycatch; and***
- (2) to the extent bycatch cannot be avoided, minimize the mortality of such bycatch***

The recommended action complies with National Standard 9 because it minimizes the bycatch of Chinook salmon to the extent practicable. Clearly the hard cap implemented with Amendment 97 is too constraining to the Gulf of Alaska groundfish fleet and as seen in the first year of applicability it is not practicable. It is important to remember that “practicable” is not equivalent to “possible”. It is the job of the Council and NMFS to find the right combination of regulations that best meet the MSA’s various objectives. The current state of nature shows us unequivocally that the Chinook salmon intercepted in the Gulf of Alaska groundfish fisheries are from areas with high hatchery production, not the wild Alaskan stocks of concern. While this bycatch is certainly undesirable, the Council and NMFS have previously determined that the groundfish fisheries cannot be prosecuted to provide the best benefit to the nation and the participants without some level of salmon interaction. It is not unreasonable to assume that if the Council and NMFS had the genetic stock of origin information available, combined with more accurate observer information on salmon interactions in groundfish fisheries particularly in the western Gulf small boat fishery, that a more liberal hard cap might have been determined to be “practicable” when final action on Amendment 97 was taken.

***National Standard 10: Conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.***

The recommended action complies with National Standard 10. It is well documented that sudden and severe economic loss can lead to difficult decisions by vessel owners to delay needed maintenance or other boat work or even lapse in paying insurance premiums. Ostensibly all of these actions (or inactions) can lead to the increased likelihood of potential safety issues. An additional amount of Chinook salmon to prosecute the non-rockfish trawl catcher vessel groundfish fishery will allow for the fishery to reopen without a race for unharvested fish.

Conclusion

The participants in the non-pollock, non-rockfish trawl groundfish catcher vessel sector are keenly aware of the importance of Chinook salmon and the need to minimize bycatch of this prohibited species. Participants in this fishery have voluntarily taken steps to reduce their Chinook salmon PSC including the development and use of salmon excluders among other measures.

The analysis used to justify the Council's FPA underestimated the negative impacts of a premature closure in the Gulf of Alaska non-pollock, non-rockfish groundfish fishery and downplayed the possibility of an early closure actually occurring due to the ability of two of the three affected sectors to use tools to modify fishing behavior and avoid salmon. The analysis further states that those catcher vessels that participate in the rationalized rockfish program as well as the non-rockfish groundfish fishery will continue to utilize their "rationalization" capabilities outside the rockfish program to coordinate activities and that the hard cap itself was an incentive to reduce interactions. This assumption was unfounded, however, and the combination of higher than expected salmon presence on the traditional fishing grounds, the higher Chinook take in the WGOA Pacific cod fishery and the uncertainty around the bycatch estimates in the CGOA Arrowtooth fishery due to the variance in basket versus consensus sampling procedures resulted in the hard cap of 2,700 fish being exceeded. Unfortunately, this perfect storm of circumstances has resulted in this important fishery closing prematurely and absent emergency action it is not clear whether there is enough flexibility built into the management system to allow more Chinook salmon to be made available to this fishery so that it could reopen.

This Council has made dramatic recommendations when other fisheries and communities have been severely impacted. The case for the non-pollock, non-rockfish trawl groundfish catcher vessels is no different. The community of Kodiak will be severely impacted by this closure. There is huge economic pain for little if any conservation gain for wild Alaskan salmon stocks.

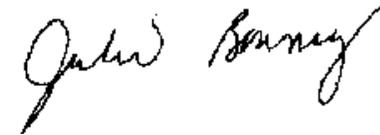
The proposed action to make more Chinook salmon available to the non-pollock, non-rockfish groundfish catcher vessel sector is a reasonable response to a situation where inaction will result in substantial and irrevocable harm to the community of Kodiak, its residents and the harvesters, processors and support businesses involved in this fishery. We believe that there is a better way to balance the MSA national standards and reduce bycatch to the extent practicable while still preserving the opportunity to achieve OY.

Finally, in October 2012, the Council started the process to develop a GOA trawl bycatch management program to finally give this fleet the tools needed to control and reduce bycatch by providing a regulated cooperative management structure for these fisheries. The gains made towards development of this program were delayed until October 2015. We have been advocating for bycatch tools for over 10 years now and implore you to continue on the path towards a regulated cooperative management structure for the GOA trawl fisheries.

Thank you for your consideration.  
Sincerely,



Robert Kruger  
Alaska Whitefish Trawlers Association



Julie Bonney  
Alaska Groundfish Data Bank, Inc.



Heather Mann  
Midwater Trawlers Cooperative

cc     Senator Lisa Murkowski  
       Senator Dan Sullivan  
       Congressman Don Young  
       Senator Patty Murray  
       Senator Maria Cantwell  
       Congresswoman Jamie Herrera-Beutler  
       Senator Ron Wyden  
       Senator Jeff Merkley  
       Congressman Kurt Schrader  
       Congresswoman Susan Bonamici  
       Congressman Peter DeFazio  
       Alaska Governor Bill Walker  
       Alaska Lt. Governor Byron Mallott  
       Department of Fish and Game Commissioner Cotten  
       Alaska Representative Louise Stutes  
       Alaska Senator Gary Stevens