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December 1, 2015

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

Re: Agenda Item D1, GOA Trawl Bycatch Management Workplan

Dear Chairman Hull,

Groundfish Forum represents six companies and eighteen trawl catcher processor vessels operating in the Amendment 80 (A80) sector of the Bering Sea/Aleutian Islands (BSAI) groundfish fisheries. Many of our vessels have a long history in and dependence upon Gulf of Alaska (GOA) fisheries. We continue to voice our support for Council actions to facilitate better management of prohibited species catch (PSC) in the Gulf, specifically through a catch share program.

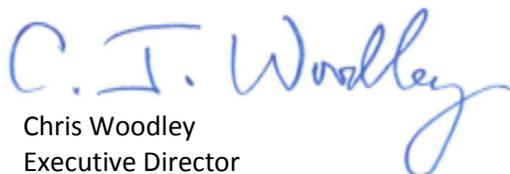
We would like to reiterate our previous concerns that any process to rationalize GOA fisheries be fair and equitable to all participants, and recognize historic dependence and investment in GOA fisheries. All members of the various trawl fisheries contribute to healthy communities and fisheries in the Gulf. As such, maintaining access for A80 companies that in many cases pioneered these fisheries is extremely important.

Based on our experience of rationalization through A80 in the BSAI, we believe that Alternative 2 of the current package is the most realistic and workable path to ending the race for fish in the GOA. Under this alternative, proposed sector allocations would bring all CPs into one sector. It is necessary to note one CP vessel, the GOLDEN FLEECE, operates only in the GOA and has so far elected not to join A80. As a result, its catch (and bycatch) **will not** show up in records for the A80 sector. Since the GOLDEN FLEECE will be part of the offshore sector in the future, history for the GOLDEN FLEECE must accrue to the offshore sector when calculating sector allocations.

We appreciate that the Council is taking the time to develop and review options rather than rushing through an incomplete or inadequately researched plan. The Gulf of Alaska is unique, and a solid rationalization program will require drawing from what has proven successful in other areas while recognizing that uniqueness.

Thank you for the opportunity to comment.

Sincerely,



Chris Woodley
Executive Director