

Peninsula Fishermen's Coalition

2767 John Street

Juneau, AK 99801

Mr. Eric Olson, Chairman

January 23, 2012

North Pacific Fishery Management Council

605 West 4th Avenue

Anchorage, AK 99501

Dear Chairman Olson:

The Peninsula Fishermen's Coalition was formed to advocate for the fishermen who participate in a range of fisheries in the Western Gulf of Alaska. Our vessels trawl and pot fish for Pacific cod and pollock in this area.

Since we will be fishing, we are writing to you to express our views on two issues that the Council will be addressing at its February meeting in Seattle:

1) the white paper on our proposed proposal to eliminate the pollock D season in the Western Gulf and redistribute the D season pollock among the remaining seasons, and

2) the proposal to change the trawl sector P. cod start date in the Western Gulf.

Pollock D Season Closure

In 2010 we experienced extremely high Chinook by catch during the pollock D season. Although we think the bycatch calculation left questions about the actual amount, we agree that the number of Chinook taken was unacceptably high. After looking at the data, it is clear that in the Western Gulf, our Chinook bycatch problems are pretty consistently confined to the D season. We asked the Council to consider eliminating this season and to reapportion the D season among the remaining 3 seasons.

We are aware that NMFS believes that this change would require a biological opinion, but we believe that a review of the data will result in a favorable finding. Sea lion populations in this area have been steadily growing, and there doesn't appear to be anything magical about the quarterly distributions as they are not required in the BSAI. If any of the Chinook taken as bycatch are part of the ESA listed Chinook on the West Coast, we believe that the modification we are proposing is the best solution for avoiding them.

We urge the Council to continue going forward with this proposal.

Changing the Western Gulf Trawl Sector P. cod Opening Date:

We originated this proposal before we formed our Coalition. We make no comment on whether this proposal is suitable for the Central Gulf. It is our policy not to make recommendations for the Central Gulf, and our comments are focused on the Western Gulf.

Halibut bycatch is our primary concern, particularly since the Council will soon be considering a reduction in the Gulf halibut bycatch number. The current January 20th opening date occurs before cod have begun aggregating in significant numbers. Inexperienced fishermen who begin on January 20 will go through a lot

of halibut to get relatively few cod. Since the P. cod allocations have now been apportioned among trawl, pot and longline it is more important than ever to set a season that allows the trawl sector to maximize P. cod harvest without incurring a high halibut bycatch rate.

A more appropriate opening date in the Western Gulf would be February 20. By that time, the cod have begun aggregating, and halibut bycatch will not be wasted.

Our vessels also participate in the Western Gulf pot cod fishery and we think opening the P. cod pot fishery on February 1 would be better for that fishery. The pot fishermen we've talked to agree with this, but for now we are primarily concerned with the trawl dates.

There are three fisheries occurring in the Western Gulf/Alaska Peninsula in January and February: 1) P. cod trawl; 2) pollock trawl; and 3) crab. Our vessels participate in all three. Our primary goal is to maximize the economic benefits of all three fisheries. Changing the P. cod date will help us achieve that.

Thank you for considering our comments.

Sincerely,

Beth Stewart on Behalf of PFC

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: D-1 (b) GOA Pollock D-season

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Ernie Weiss	Aleutians East Borough
2	George Hutchings	
3	Julia Penny	AGDB
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.