

**NATIVE VILLAGE OF PORT LIONS
PORT LIONS TRADITIONAL TRIBAL COUNCIL**

RESOLUTION NO. 2015-10R

A RESOLUTION OF THE NATIVE VILLAGE OF PORT LIONS TRADITIONAL TRIBAL COUNCIL REQUESTING THAT THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL TAKE ACTION TO REDUCE THE QUANTITY OF HALIBUT BYCATCH IN THE BERING SEA ALEUTIAN ISLAND FISHERIES BY SETTING NEW BYCATCH LIMITS WHICH LOWER HALIBUT PROHIBITED SPECIES CATCH CAPS BY 50% OF THE CURRENT LIMITS.

WHEREAS, the Native Village of Port Lions is a federally recognized Indian Tribe for the "Native Village of Port Lions" as defined in Section 3(c) of the Alaska Native Claims Settlement Act, as amended; and

WHEREAS, the Port Lions Traditional Tribal Council is the governing body of the Native Village of Port Lions; and

WHEREAS, coastal communities in Alaska depend on Alaska's halibut resource for sustenance, recreation, cultural traditions and livelihood; and

WHEREAS, the halibut fishery is of critical importance to the state, providing significant income to the state and its residents through commercial and charter fisheries; and

WHEREAS, the halibut stock and fishery are in a critical state after a continuous stock decline over the last decade; and

WHEREAS, the commercial catch limits for halibut in the Central Bering Sea were reduced by 68% in the last decade in order to conserve halibut stocks; and

WHEREAS, halibut bycatch limits for trawl fisheries operating in the Bering Sea, currently set at more than 7 million pounds, have not been significantly reduced for 30 years; and

WHEREAS, BSAI trawl fisheries caught and killed 7 times more fish than the directed fishery landed in the BSAI in 2014; and

WHEREAS, historical tagging studies indicate that halibut spending the first few years of their lives in the Bering Sea can and do end up in virtually any regulatory area; and

WHEREAS, halibut play a key role in the economies throughout Alaska, therefore stock health and catch limit cuts have and will continue to have dramatic effects on our fisheries, businesses, economies and communities that depend on the halibut resource; and

NVOPL
Resolution No. 2015-10R
Page 2 of 2

WHEREAS, every pound of halibut caught as bycatch results in a direct loss of yield and spawning biomass of the North Pacific halibut resource; and

WHEREAS, the Magnuson-Stevens Act requires under National Standard 9 that bycatch be reduced; and

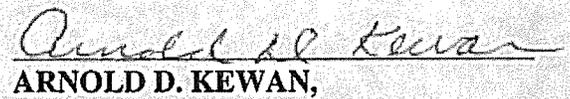
WHEREAS, National Standard 8 requires councils provide for the sustained participation of fishery dependent communities;

NOW, THEREFORE BE IT RESOLVED that the Native Village of Port Lions Traditional Tribal Council requests immediate action by the North Pacific Fishery Management Council to reduce halibut bycatch in the Bering Sea Aleutian Island fisheries by not less than 50%.

CERTIFICATION:

We, the undersigned members of the Native Village of Port Lions Traditional Tribal Council, do hereby certify that the foregoing resolution was duly adopted on this 14th day of May, 2015, with a vote of 5 for 0 votes against 0 abstaining.


SUSAN R. KEWAN, PRESIDENT


ARNOLD D. KEWAN,
SECRETARY / TREASURER

Dear Chairman Hull,

I began commercial fishing on the east coast, bottom trawling in 1976. Starting in 1981 I came to Alaska, fishing primarily in the Bering Sea. Besides many of years bottom trawling I spent several years crab fishing, about ten years mid water pollock fishing and twenty summers gillnetting salmon on the Copper River and Prince William Sound.

So I have worked through many ups and downs in fishing over the last 39 years.

But in all that time I have never experienced anything close to the hardship that is certain to be caused by the 50% drop in halibut quota that is being proposed for the Amendment 80 trawl fleet. If this legislation gets passed it will deal a crippling blow to our ability to make a living. Many of the boats will not be able to work a full year, and gross revenues could suffer by 50% or more.

Halibut avoidance already drives our fishery. The vessels in this fleet all spend a lot of valuable time running away from good fishing grounds to search out target fish that have less halibut mixed in. We often compromise and end up working on less productive grounds in order to save halibut, which also lengthens our trips. If the halibut quota is further reduced as planned it will make many areas "off limits", and make it impossible to operate normally.

When vessels suffer a substantial income loss of this magnitude it becomes much harder for the companies owning the vessels to maintain them at a reliable and safe level. Legislative action that would compromise the reliability and safety of these vessels, and therefore the crew's safety should not be considered as a viable option.

Thousands of jobs that support an equal number of families will be severely impacted if this regulation passes. No doubt many jobs will be lost. Please make every effort possible to make sure this ruling is not allowed to pass.

Thank you for your consideration.

Regards,

William McCarthey
F/T Legacy
United States Seafoods

May 10, 2015

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

Subject: Halibut PSC Action

Dear Chairman Hull:

The undersigned crew work on the F/T LEGACY for United States Seafoods. Many of us have spent our entire working lives on fishing boats. Some of us have only worked on this boat.

We very concerned that the North Pacific Fishery Management Council is considering reductions to the halibut bycatch limit for the Amendment 80 sector at its June meeting. Any cut will affect our fishing and the amount we make in our jobs. A large cut would mean a big reduction in our fishing and lost work for us. Our families rely on our jobs and any cut will have effects beyond us to our families.

We are constantly concerned about halibut on our boat. We use excluders. We also move when we find halibut mixed with our targets. We use far less halibut now than before amendment 80, which already helps the halibut fishermen. We are always thinking of ways to save more halibut but there isn't much more we can do. We would like to keep the halibut we can't avoid, but that has been blocked. It is a big waste to throw back fish that won't survive.

Our fishery relies on halibut bycatch to survive. We hope that you think of the people who work in the amendment 80 fishery when you are looking at making these reductions. Any cuts will hurt our fishery and the people who depend on it.

Sincerely –

Neil Dean

Thorbjorn Timbogessen

Chad Keller

[Signature]

Edgar O Tejada

[Signature]

David Maffett

[Signature]

~~George A Sanchez~~

George A Sanchez
George Sanchez

Andres T. Nava

Felipe

Max Walker

Jose Lopez

Rafael

Dan

Juan

William



TO: North Pacific Management Council
FROM: Pacific Stevedoring, Inc.
RE: Halibut by-catch and Amendment 80 vessels

To whom it may concern;

I have been an Alaskan since 1996. I live and work in Dutch Harbor and have built a labor and equipment company providing services to the Amendment 80 vessels. The North Pacific Management Council is meeting in June to decide whether to adjust the Amendment 80 fleet's allowable halibut by-catch. The Council's decision is likely to cost Alaskan jobs.

We have been providing longshore services either directly or indirectly since 1998. Our company has grown from a few hard working Alaskans to a little over 120 employees. We provide these services in Dutch Harbor and Adak Alaska. I can say without any reservation that any dramatic cut in the Amendment 80 vessels ability to deliver fish to Dutch Harbor will have a devastating impact on our labor force and their families. These employees depend on the steady work of the Amendment 80 fleet that fish year round providing steady income. Unlike many of the other Alaska fisheries that are seasonal, the Amendment 80 vessels are steady and make it possible to maintain a well paid qualified work force year round.

In 2014 Pacific Stevedoring received \$4,414,870 in stevedore revenue from Amendment 80 vessels. Even modest cuts to this revenue will potentially cost up to a dozen jobs. But dramatic cuts could very well eliminate all the jobs. Employees cannot maintain residency and employment in Dutch Harbor if standing by for large parts of the year waiting for work.

Equally important is the secondary effects on the rest of the fishing industry and community as a whole. We all watched many jobs disappear in Dutch Harbor as the rationalization of the many fisheries reduced the demand for 3rd party vendors. The Amendment 80 vessels support a large part of the Dutch Harbor Community and reductions in their deliveries will have far reaching effects. Impacts will range from possible elimination of shipping companies that support them, which will reduce fish company's options to get product out, driving up the cost of shipping, to significant cuts in city tax revenue, forcing the city to raise taxes on the other sectors to make up the difference and numerous other effects in between.

I can say without hesitation if the Amendment 80 vessels were to see dramatic cuts in deliveries resulting from halibut by-catch cuts, Pacific Stevedoring will have to eliminate approximately 50 good paying jobs while the City of Dutch Harbor will endure many other hardships as well.

Kind regards

Andrew Murphy
President - Pacific Stevedoring
907.581.8648

Pacific Stevedoring
Dutch Harbor, AK

Subject: C2 Bering Sea Halibut PSC
From: Ty Vandergriff <vanderty@gmail.com>
Date: 5/18/2015 5:11 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>
CC: Amanda <aevandergriff@gmail.com>

To whom it may concern:

I'm sure you will receive thousands of letters like this. Letters that show the blatant disregard commercial halibut fishermen have for the future of this fishery. It's obvious by the mountains of data over the years that the by-catch numbers are ludicrous.

I am a southeast Alaska sport and charter fishermen. My family's livelihood depends on our relatively short fishing season to survive. Our most current southeast Alaska 'guided fisherman halibut limit' regulation makes me sick. 1 halibut, really? This restriction comes primarily at the hands of commercial fisherman. The same fisherman whose by-catch decimates probably 7 times the number of halibut the entire charter fleet catches. It's a joke. A sick joke, being played on us. If my tone seems bitter, it should be! Each year we watch more of our business slip away. How can any self respecting captain charge guests for one small halibut? We can't, and we don't because it's wrong.

Our noose gets tighter and the commercial fishery gets looser. We charter captains pay the price for the ignorance of congress as they are blinded by the commercial halibut juggernaut. They see dollars and turn a blind eye to this tragedy.

Do something about it, please.

Ty Vandergriff
To the Limit Sportfishing
412 D-1 Loop Rd
Ketchikan, AK 99901
503-358-0868

Subject: C2 Bering Sea Halibut PSC
From: "Mark Bloch" <mbloch18@comcast.net>
Date: 5/18/2015 6:02 PM
To: <npfmc.comments@noaa.gov>

To whom it may concern:

One doesn't have to have a PHD in Marine Science to understand that by-catch limits need to be narrowed considerably. I hope that you will consider this in light of the waste that is going on with the fishing fleets.

It is a very simple solution, reduce them gradually over the next three years to an amount that most environmental groups consider reasonable. Not everything in life is about profit. We need to ensure that we leave the planet in a decent and environmentally sound condition for our children.

Thank you.

Mark Bloch

16010 Terracewood Lane
Anchorage, Alaska 99516-4825

Home: 907-222-2869
Cell: 801-230-8718

Email: mbloch18@comcast.net

Avast logo

This email has been checked for viruses by Avast antivirus software.
www.avast.com

Subject: Please stop the halibut bycatch waste now
From: Mary Jane Longrich <mjlongrich@icloud.com>
Date: 5/18/2015 7:35 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear council members,

As a wife and mother of fishermen in Kodiak, and as a consumer fond of Halibut, I am concerned about the huge quantity of wasted halibut through "bycatch" from trawlers. This issue needs to be revisited, studied and hopefully some means of reducing the bycatch will result.

Respectfully,
Mary Jane Longrich

Sent from my iPad

Subject: C2 Bering Sea Halibut PSC
From: Amy Christiansen <justamyc@hotmail.com>
Date: 5/18/2015 8:21 PM
To: npfmc.comments@noaa.gov

Please PLEASE do everything in your power to reduce the halibut bycatch caps in the Bering Sea/Aleutian Islands by no less than 50 %!

We must sustain our fisheries for future generations, if not simply for ourselves and we have to travel further and further out of Homer to catch our limit every year!

I do not want to end up like Norway with their cod so many years back. In Cod we trust? NO, IN YOU GUYS- I PUT MY TRUST.

Please and thank you for your undivided attention on this issue!

**Amy Christiansen RN LVT
Homer Alaska 99603**

Subject: Halibut Bycatch
From: Ted Lewis <tckglewis@comcast.net>
Date: 5/19/2015 7:56 AM
To: npfmc.comments@noaa.gov

Hello, Thought I would express my feelings about Halibut Bycatch, as I hold 2C halibut quota, on the F/V Kaysie out of Petersburg. To me and it seems to many it is hard to believe that it has taken 20 years for the NPFMC to act on the Bycatch issue, especially in light of the drastic cut in quota the Longline & Sport fleets have taken in the last Decade. Yes 10 years !!. I would think the NPFMC could do a better job than that, and I hope you will greatly reduce the Halibut Bycatch. Thank you,
TED LEWIS / F/V Kaysie

Subject: "C2 Bering Sea Halibut PSC"
From: ruthcusack <ruthcusack@live.com>
Date: 5/19/2015 8:29 AM
To: npfmc.comments@noaa.gov

Dear NPFMC & NOAA,

We won't stand for the want and waste any more. The halibut by-catch by bottom trolling in the Bering Sea is disgusting and wrong. Why do you allow this to happen? Please help save the halibut for future generations. Make this stop.

Sincerely,
Ruth Cusack

Subject: C2 Bering Sea Halibut PSC
From: lee zucker <lee.m.zucker@gmail.com>
Date: 5/19/2015 8:40 AM
To: <npfmc.comments@noaa.gov>

My family and I have read that halibut bycatch caps remain at the same level set during peak abundance decades ago, despite the fact that halibut fisheries landings have been cut by 63% in the Bering Sea since 2005. In other words, skewed conservation efforts have created a negative disparity between halibut fishermen and fisheries that harvest halibut as bycatch in the Bering Sea. Is it really true that In 2014, BSAI groundfish fisheries killed and discarded seven times more halibut than the fishery landed in the same region? This sounds misdirected and really awful.

Please reduce halibut bycatch caps in the Bering Sea/Aleutian Islands by no less than 50% and hope that this substantial reduction will give the halibut fishery and the communities that depend on it the relief they need.



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

May 15, 2015

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

It has come to our attention that in June the North Pacific Fishery Management Council is considering cutting the halibut prohibited species cap for the Amendment 80 sector and would reallocate that halibut to another fleet of vessels. We encourage you to consider the value of the Amendment 80 fleet to our business and others when making this decision.

Amendment 80 vessels and their owners are a major portion of our business. We provide refrigeration based equipment and service to many of the vessels while in Port in Seattle as well as being on call for service in Alaska.

Amendment 80 fishermen are also an integral part of the Alaska & Washington maritime community. We ask you to please balance the needs all of our fishermen and strive to develop solutions that can be achieved by the Amendment 80 vessel without significantly curtailing their operations. Anything done to curtail their operations would negatively affect our business as well as the Amendment 80 vessel owners and fishermen.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Granath".

Jon Granath
Sr. Projects Acct. Exec.
Johnson Controls Marine & Industrial

cc: Senator Patty Murray - shawn_bills@murray.senate.gov
Senator Patty Murray - anna_sperling@murray.senate.gov
Senator Maria Cantwell - nicole_teutschel@cantwell.senate.gov
Congressman Rick Larsen - Matt.Bormet@mail.house.gov
Congresswoman Jamie Herrera Beutler - Jordan.Evich@mail.house.gov
Congresswoman Suzan DelBene - ben.barasky@mail.house.gov

Subject: Bycatch

From: Cash Joyce <cashjoyce@gmail.com>

Date: 5/19/2015 10:22 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

I would like to see by catch reduced by at least 50%. Why not require fisherman to sell all their catch at face value during any season. There would be no bycatch and the skill of the fisherman would be shown in profits by how much of their target fish would be caught.

Cash Joyce
Born an raised Alaskan



STANDARD BAG MANUFACTURING CO.
1800 SW Merlo Drive
Beaverton, OR 97006-5014

Phone: 800.654.1395
503.591.0332
Fax: 503.642.9335
E-mail: sales@bagusa.com

Tuesday, May 19, 2015

Mr. Dan Hull, Chairman

North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Rob Payne and I represent Standard Bag Manufacturing Co. We provide Poly laminated Bags to fishing vessels in the North Pacific. As a manufacturing entity in the Pacific NW, we value all of our customers and try very hard to help them succeed.

I understand that in June the North Pacific Fishery Management Council is considering cutting the halibut prohibited species cap for the Amendment 80 sector and would reallocate that halibut to another fleet of vessels. I encourage you to consider the value of the Amendment 80 fleet to my business and others when making this decision.

Amendment 80 fishermen are an integral part of the Alaska & Washington maritime community. Please balance the needs all of our fishermen and strive to develop solutions that can be achieved by the Amendment 80 vessel without significantly curtailing their operations.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Payne", with a large, stylized flourish at the end.

Robert J Payne
National Sales Manager

cc. Kristian Uri

Subject: trawl by catch

From: "Frohlich, Brian J." <bjfrohlich@nd.gov>

Date: 5/19/2015 1:54 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Hello, my name is Brian Frohlich I live in Underwood, North Dakota and work as a Fisheries Technician for the ND Game and Fish dept. The by-catch that these trawlers are being allowed is preposterous, I come to Valdez,AK annually and enjoy the wonderful fishing the state has to offer. I know from my education that you cannot keep taking at certain rates without having an effect on a fishery, especially one with a slow growing, long lived fish. For me seeing any halibut as by catch and discarded is a shame. Please take an active approach to this situation and cut the by catch by much as legally possible. That is the problem with our fisheries work it's hard to see what damage is being done by over fishing until it's too late and then it takes many years to get back to where you want it to be, so if you can be proactive and get ahead of the problem do it, even though I think your already behind, just look at the cuts being taken south of the Bearing Sea.

Thanks for your time,
Just a concerned fisherman
Brian Frohlich

Subject: Subject: BSAI Halibut PSC Limit Reductions
From: Rufus Littlefield Jr <bigrufe@msn.com>
Date: 5/19/2015 2:06 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>
CC: "kseuri@gmail.com" <kseuri@gmail.com>

Attn: Mr. Dan Hull, Chairman, NPFMC

Dear Chairman Hull,

My name is Rufus Littlefield and I represent Littlefield Packaging Inc. We provide packaging to fishing vessels in the North Pacific and around the world. We value all of our customers and try very hard to help them succeed.

I understand that in June the North Pacific Fishery Management Council is considering cutting the halibut prohibited species cap for the Amendment 80 sector and would reallocate that halibut to another fleet of vessels. I encourage you to consider the value of the Amendment 80 fleet to my business and others when making this decision.

Amendment 80 fishermen are an integral part of the Alaska & Washington maritime community. Please balance the needs all of our fishermen and strive to develop solutions that can be achieved by the Amendment 80 vessel without significantly curtailing their operations.

Sincerely,

Rufus Littlefield

Littlefield Packaging, Inc.

Subject: Alaska halibut fishery in the Bering Sea
From: Ronald Ross <ronross75@icloud.com>
Date: 5/19/2015 2:22 PM
To: "NPFMC.comments@noaa.gov" <NPFMC.comments@noaa.gov>

Dear Staff and Policy Committee:

I am an avid Sportsman and long lived resident of Alaska. I see the dwindling opportunities of the salmon and groundfish resources. BYCATCH SHOULD NOT BE AN ALTERNATIVE TO TARGETED FISHERIES, OR A WASTED RESOURCE! These are not limitless resources. The balance of compromises between all the human predation is far too much in favor of the commercial industry which has many lobbyists, power, and the committees and commissions of the State of Alaska has its commercial majorities and monopolies that dominate the decisions towards their interests as well as the interest of the resource. Trawlers should not be used in the Bering and offshore of Alaska. These Trawler productions are not viable strategies of harvest in this day and age. The U.S. Fleet should be setting the standard of withdrawing the Trawling for the International Fleets. Trawling is very harmful . Next, since you are a compromising entity. I ask you to do consider the commerce of Alaska and its residents. Make policy that gives this State a chance to grow and sustain the resource. If the trawlers can not be taken out of the strategy, then make it sustainable for the rest of us. Thank you.

Ron Ross

Sent from my iPad

Subject: June 2015 Sitka meeting--Agenda item C2 HAL 15-023 Bering Sea Halibut Bycatch
From: David Carter <davedane@gci.net>
Date: 5/19/2015 2:59 PM
To: npfmc.comments@noaa.gov
CC: David Carter <davedane@gci.net>

Thank you for allowing public comment on this important agenda item. I have lived in Alaska since 1984, and have been in the state first for summer visits and then for work since 1972. I am a sport fisherman. One of the species I fish for is halibut. This has almost always been done with charter boats out of Homer. This year, I am restricted to one 29 inch or less fish (maybe six or seven pounds of filets), and one regular fish. The "regular" fish size in the Homer area has decreased substantially over the years, in my opinion.

Sportfishermen spend a fair amount on incidental items, such as fuel, lodging, meals, all of which contributes to the economy here in Alaska. Certainly, given our difficult budgeting times, given the recent drop in oil prices, looking for alternative sources of income is important. Tourists of course spend a lot more than locals, but one wonders how many folks will want to incur the substantial expenses to travel to Alaska for a 29 inch halibut as one of their two fish.

In reviewing the online pdf information relating to this agenda item, it appears the trawl boats are allocated 3,675 metric tons for halibut mortality. 2,325 metric tons of this amount goes to the Amendment 80 boats. These are tremendous amounts of protected fish to discard, even if such limits have not been reached in recent years.

As noted on page 51 of the online report regarding this agenda item, halibut stock declined dramatically from the late nineties to around 2010. It is felt that the female spawning biomass has stabilized at around 200 million pounds, but it has not begun to rise to former levels. On page 52, it notes that the IPHC overestimated stocks and underestimated harvests. That is not a good thing. (If independent observers are not required to be on all trawl vessels, they should

be.)

On page 54, the report notes an abundance survey in the eastern Bering Sea suggesting 130 million halibut in 2006—and 65 million halibut in 2014. It would be difficult to try to spin this into being some sort of good thing. There are a lot fewer halibut out there, and the substantial trawl industry halibut by catch/wastage is not increasing the number of these fish which are so important to many Alaskans. On page 55, the report indicates that there is a very strong trend of declining weight at age coastwise. This would be consistent with my personal experience with the Homer halibut fishery.

The information on page 68 indicates that the trawl fisheries have a much higher rate of halibut mortality. It is past time to reduce the trawl sector's bycatch limits. I support the 50% reduction. I suppose it could be phased in, 30%, 40% and 50% over three years.

Elsewhere in the report, it notes that the trawl industry can address lower bycatch requirements by various methods, including gear used, and time and location of fishing to avoid heavier concentrations of halibut. The industry will adapt to the new limits and become more efficient. That should be a win win situation for everyone. Thank you for your work on this very important issue.

David Carter
1920 Shore Dr
Anchorage, AK 99515

Subject: Bycatch

From: Lee and Lucinda Neel <kodiakbigtimber@yahoo.com>

Date: 5/19/2015 7:07 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

I own and operate a charter boat in Kodiak. The waste of fish as bycatch is sickening. ALL that waste has got to be stopped. I have seen a drop in halibut size and quantity over the last nine years. PLEASE STOP THE WASTE OF OUR RESOURCES. I THINK ALL THE BYCATCH SHOULD BE PROCESSED AND PAID BY THE BOAT THAT CAUGHT IT AND THEN GIVEN TO SHELTERS AND THE HOMELESS. No bycatch of any species should be allowed!

Lee Neel

Subject: Please respect the Pacific Halibut Fishery
From: Kevin McElhaney <mcelhakd@gmail.com>
Date: 5/20/2015 8:25 AM
To: npfmc.comments@noaa.gov

My name is Kevin McElhaney, I live in Anchorage, Alaska and I recreationally fish for halibut in Alaska, Oregon, and California.

I, as a recreational fisherman, am very concerned about the high level of by-catch of Halibut in the Bering Sea as described in your Final action item C2 - Bering Sea Halibut PSC.

We know that the Bering Sea has a huge population of juvenile halibut and that those halibut migrate from the Bering Sea to other areas throughout the range of the pacific halibut. Right now the trawl by catch is preventing millions of halibut from leaving the Bering Sea and repopulating other areas.

This practice must be curtailed immediately or rural communities will suffer and the future of halibut fishing all over the Pacific will continue to be threatened. These are unacceptable risks to most of the users of this iconic resource to the benefit of a small number of trawl vessel owners and crews. It is one thing to ask all users to conserve a resource, but it is quite another all together to ask most users to sacrifice and conserve the resource to benefit of a specific group of large factory trawlers. That is what is happening and it is not fair or equitable. By-catch not only needs to be reduced and then linked to abundance, so all users can share in the sacrifice and in the benefits of a healthy resource. It is absolutely absurd that recreational fisherman are required to have a 29 inch limit on 50% of our daily catch while the commercial trawlers are discarding **13 of every 14 fish**

caught. If i were to catch a juvenile halibut that were to die before being able to be released, I would be required to count that towards my daily and yearly quota.

Please show Alaskans you care about the communities and the resource and take significant action to reduce Bering Sea by-catch of halibut to a level that provides opportunity for the rest of us and protects millions juvenile halibut for being caught and discarded.

Sincerely,
Kevin McElhaney



Optimar U.S. Inc

Seattle, May 20th, 2015

2001 West Garfield

Terminal 91, Building C-155

Seattle, WA 98119

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

Subject: BSAI Halibut PSC Limit Restrictions.

Dear Chairman Hull,

I am writing to you on behalf of Optimar U.S., Inc.

Optimar U.S, Inc was established in June of 2014, and we are part of an international company that manufactures processing equipment for the fishing Industry, for both sea and land based operations. Optimar have been in business internationally for over 40 years, and delivered the world's first factory for a factory trawler in 1973. Annual turnover as a group is around 100 mill US dollars and we employ about 160 people.

In Seattle we currently have seven people, and are projecting to be about 15 people strong within the next year, with an annual turnover of 10 to 15 Mill US, in sales.

I have spoken to several people in the industry and I am understanding that the plan is to cut the halibut prohibited species cap for the Amendment 80 fleet, and that it would be reallocated to another fleet.

The amendment 80 fleet is very important to my business and we depend on the work we get from them, to keep our employees with work throughout the year. I ask you to consider this when making this decision, and that it can have far reaching effects.

These vessels and their jobs are very important for all of the Puget Sound maritime industry, and I ask that this is taken into account before any changes are made to the prohibited species cap.

Sincerely,

Frank Flem
President
Optimar U.S, Inc

Subject: C2 Bering Sea Halibut PCS
From: Phil Pirone <phil@pro-cure.com>
Date: 5/20/2015 2:29 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Sirs and Madams:

Over the last two years I have testified at several meeting in Boise Idaho and Vancouver, Washington over the protection of unlisted forage fish. I was extremely impressed with the councils concern over protection and regulating the harvest of these baitfish as they are a vital food link to juvenile salmon and ling cod, and our offshore albacore fisheries. So I am shocked to hear that the troll and net Pollock fishery in Alaska has killed over 62 million pounds of halibut over the last 10 years. This type of fishery is a disgrace, and I cannot even begin to believe it exists. I was aware of the horrendous salmon kill this fishery produces, but the waste of tons of halibut compounds the evil.

I have a sport fishing business in Oregon. We provide bait scents and attracts for both the sport halibut and the sport salmon anglers. Reduction of the available halibut and salmon in both Washington, Oregon, British Columbia, and Alaska seriously affects my business. I have great respect for the commercial fisheries, but if bycatch mortality cannot be reduces or virtually eliminated this fishery need to be permanently shut down. Let them make surimi and white fish sandwiches out of farm raised Tilapia or catfish. The world can live without both products.

As and Oregonian and US citizen I can tell you so many of us are sickened by our politicians and regulators being bought and sold by big dollar interests. Our politician and regulators need to do what is morally right. Otherwise I doubt if the US can long endure the corruption of these evil enterprises, and make no doubt about it, this Pollock fisher is pure evil. The revenues they produce may seem massive, but the damage they do in other unseen areas of our fisheries more than offset the visual financial gains of the Pollock fisheries. Thank you for your time and consideration. I have great respect for the individuals on this commission. Please do what you know in your hearts is right.

Phil Pirone, President, Pro-Cure Inc. WWW.PRO-CURE.COM

Subject: "C-2 BSAI halibut"

From: Liz Wilkie <birdkrazy@msn.com>

Date: 5/20/2015 5:00 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

I am writing this to say our family is a long line halibut fishing family. We depend on the fishery for our income, we commercial fish. Our quota has dropped so drastically over the past several years it is getting harder to make a living.

In order to continue and support our family there needs to be a reduction in the BSAI bycatch of 50%. Sustainable fisheries need the support of all sectors in order to protect the future for all who depend so deeply on the fishery during low abundance times.

We really need to protect and conserve this fishery!!! state this to make sure my family and all those who depend on this to have a future in halibut fishing.

Thank you

Subject: Halibut Bycatch
From: William Harrington <galewarning@gmail.com>
Date: 5/20/2015 5:03 PM
To: npfmc.comments@noaa.gov

To whom it may concern.

I moved here from Massachusetts 35 years ago. I left there because of dwindling fisheries and found Alaska to be a dream come true. There were plenty of fish to be caught. Kodiak was a salmon port fairly devoid of bottom trawlers. In fact I delivered the first cod to many of the canneries here using fixed gear. These canneries included Westward, All Alaskan and International Seafoods.

I had lived through the foreign fleets decimating our stocks and then with the passing of the 200 mile limit, the expansion of our home bottom trawl fleet and the devastation of our fish stocks. Alaska seemed a safe haven.

Now, Kodiak is ruled by the trawl fleet and their lobbyists and I can see the writing on the wall for our way of life. Economics trumps science, money buys votes. Even our own local legislators are seemingly ruled by these same tenets.

There must be some reasonable way to address this by catch issue instead of letting this ocean go the same way as the Atlantic.

My two children grew up fishing halibut with me and putting themselves through college with their earnings. Now you couldn't send a child to daycare on that resource and certainly their children will never see anything remotely like what they were lucky enough to enjoy.

Please do something about this fishery that is destroying our future. Don't allow a group of people with no stake in Alaska to remove our fish and dollars to Washington and Oregon. Address the halibut by catch issue in a meaningful way. Don't be influenced by the lobbyists who buy you the best lunch. There is no free lunch.

Bill Harrington
F/V Kilkenny
Box 8166
Kodiak, AK 99615

Subject: "C-2 BSAI halibut"

From: Tim Wilkie <fvspectre@msn.com>

Date: 5/20/2015 5:08 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

This is to voice my opinion on the 50% bycatch limit cap that is so drastically needed in order for myself and all other commercial fisherman to survive in this industry!

My quota has been cut so deep it is getting harder to provide income for my family now.

I stress that it is time all sectors of the industry do there part to protect it. Especially now in times of low abundance of product to catch.

Thank you

Subject: comments

From: Jarl Gustafson <jarlgust@yahoo.com>

Date: 5/20/2015 6:01 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Re; C2 Bering Sea Halibut PSC Final Action

We strongly urge the council to reduce the halibut bycatch (PSC) in the Bering Sea by at least 50% !!!!

As commercial halibut fishers we feel this is necessary to properly manage and utilize the halibut stocks. Also, this kind of waste of such a high value species is unconscionable.

Jarl and Kathleen Gustafson, f/v Vigor, Homer AK

Subject: C2 Bering Sea Halibut PSC
From: j green <jk_green@yahoo.com>
Date: 5/20/2015 6:03 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>
CC: "bonnie.bruce@mail.house.gov" <bonnie.bruce@mail.house.gov>,
"erik_elam@sullivan.senate.gov" <erik_elam@sullivan.senate.gov>,
"Ephraim_froelich@murkowski.senate.gov" <Ephraim_froelich@murkowski.senate.gov>

Dear Council,

This e-mail is being sent in regards to the halibut bycatch. My concern is focused on the high levels of bycatch allocated, with no changes in recent years to adjust for actual fish stock.

The recent caps for bycatch have not matched the reduced harvest allocations for halibut fisheries. This disparity seems unjust as it unfairly allows bycatch while limiting halibut fishers. It should be noted that the bycatch is killed and discarded. This a waste of an important resource and simply not acceptable. Juvenile halibut reduction affects the entire PNW and as such, the upcoming decision of the Council has wide-ranging affects. I hope that the Council considers the implications of allowing high levels of bycatch, and resource waste that will impact an entire region.

With declining halibut stock, this situation will only worsen unless bycatch caps are set to realistic levels. I support the Alaska Marine Conservation Council, and others who are requesting that bycatch caps be reduced by a MINIMUM of 50%.

Best regards,

Jason Green
Oregon

Subject: "C2 Bering Sea Halibut PSC"
From: Nancy Hillstrand <halibuts@gmail.com>
Date: 5/20/2015 8:56 PM
To: npfmc.comments@noaa.gov

Pioneer Alaskan Fisheries Inc
4306 Homer Spit
Homer Alaska 99603
May 20th, 2015

Greetings Council Members,

It is imperative that this outrageous magnitude of wanton waste of our common property halibut in the Bering Sea cease. Promoting bycatch to boost Corporate groundfish business Plans for special interests is a disgrace to fisheries management in Alaska and in the United States.

We are a 51 year old Alaskan Fishery Corporation that promotes sustainability and quality not just in word or blanket certification but in deed. We have seen and felt the effects of the big hit in quota to halibut fisherman. Our business' and our communities have taken deep cuts. We grin and bear these regulations to provide for halibut sustainability.

When there is a conservation issue it is our responsibility to do our part for this resource that sustains us. It does not bode well to watch a very few huge groundfish draggers continue unchecked for decades, taking and discarding huge amounts of our valuable halibut as bycatch.

Imagine the thousands of people who clearly realize this wanton waste continuing and the grave imbalance of allocation blessed by the North Pacific Management Council to serve groundfish draggers.

I have come before the North Pacific Management Council over a dozen times on this same issue for over 25 years. It is appalling to think this can still be going on.

All cities, , all boroughs, all businesses must accept the responsibility to feel the crunch of protecting our resources. Yes it will affect cities in the Bering Sea, Dutch included, yes it will affect Business plans just like it has affected ours.

We need to see some positive action for the halibut wanton waste. We must all tighten our belts together instead of seeing this disparity. We need to know that every sector in the fishing industry is doing its meaningful part to promote sustainable fisheries.

Strive for Zero tolerance of bycatch. If a fishery cannot fish clean maybe it is time to phase out that fishery. To reward dirty fishing is atrocious and must cease.

Thank-you in advance for taking meaningful bold action to stop this dirty fishing
Sincerely,

NJ Hillstrand
907-235-9772

Subject: C-2BSAI Halibut
From: Alpine Design & Building <gaulbach@gci.net>
Date: 5/21/2015 6:59 AM
To: npfmc.comments@noaa.gov

To:
North Pacific Fishery Management Council

Council Members,

I have been a Commercial Halibut fisherman in Petersburg Alaska for more than 25 years. When the IFQ program was implemented I bought in to the fishery with the idea that it was a secure well managed fishery that I could enjoy and pass on to my sons when I was ready to retire. Like many of the other Halibut fishermen, when our quota was cut by more than 80% overall, my income from Halibut fishing no longer covered the loan payments for my IFQ's. If not for other fisheries and employment I would have lost my IFQ's.

Besides depending on Halibut for income, my family and I also enjoy sport fishing for Halibut and it remains an important part of our diet. The current reallocation of the Halibut resource to by-catch and away from the Halibut fleet is totally unacceptable. I view it as a complete waste of the resource and one of the main reasons my quota remains so low and the reason why sport and charter fishermen have to go farther and farther away from port to find places to catch Halibut.

The Halibut fleet in my area has had to endure cuts of more than 80% to our quota, cutting the by-catch cap by 50% for the trawlers is the least that you can do. Please stop the incredible amount of waste that has been going on for the past 20 years. The technology is there, please start the process of truly rebuilding our stocks by reducing by-catch. The future of the resource and the Halibut industry is in your hands, please do your part to make sure the future is bright.

Thank you for your time.

Gary Aulbach
Petersburg, Alaska

C-2 Basi Halibut

Its way past time to reduce the halibut bycatch cap in both the bsai and goa drag fisheries, commercial halibut fishing is my living, sport and subsistence halibut users also depend on the halibut resource to rebuild, our catch limits have been in steady decline for 14 years.

The bsai drag fisheries have not had a change in there bycatch cap in 20 years, there was a lot more in the halibut biomass 20 years ago, its obvious the halibut resource is in trouble, its obvious which user group is not doing its share of conservation.

Please reduce the bsai halibut bycatch cap by 50%, the directed halibut fishery is down 70% in the last 14 years.

George Kirk

George Kirk

C-2 Bsai halibut

Its way past time to reduce the halibut bycatch cap in both the bsai and goa drag fisheries, commercial halibut fishing is my living, sport and subsistence halibut users also depend on the halibut resource to rebuild, our catch limits have been in steady decline for 14 years.

The bsai drag fisheries have not had a change in there bycatch cap in 20 years, there was a lot more in the halibut biomass 20 years ago, its obvious the halibut resource is in trouble, its obvious which user group is not doing its share of conservation.

Please reduce the bsai halibut bycatch cap by 50%, the directed halibut fishery is down 70% in the last 14 years.

Thomas S. Fian
Thomas S. Fian
President AlpenView Wilderness
Lodge
5-18-15

C-2 BSAI halibut

Its way past time to reduce the halibut bycatch cap in both the bsai and goa drag fisheries, commercial halibut fishing is my living, sport and subsistence halibut users also depend on the halibut resource to rebuild, our catch limits have been in steady decline for 14 years.

The bsai drag fisheries have not had a change in there bycatch cap in 20 years, there was a lot more in the halibut biomass 20 years ago, its obvious the halibut resource is in trouble, its obvious which user group is not doing its share of conservation.

Please reduce the bsai halibut bycatch cap by 50%, the directed halibut fishery is down 70% in the last 14 years.

GEORGE E. MARSHALL

George E. Marshall 5-18-15

c-2 Basi halibut

Its way past time to reduce the halibut bycatch cap in both the bsai and goa drag fisheries, commercial halibut fishing is my living, sport and subsistence halibut users also depend on the halibut resource to rebuild, our catch limits have been in steady decline for 14 years.

The bsai drag fisheries have not had a change in there bycatch cap in 20 years, there was a lot more in the halibut biomass 20 years ago, its obvious the halibut resource is in trouble, its obvious which user group is not doing its share of conservation.

Please reduce the bsai halibut bycatch cap by 50%, the directed halibut fishery is down 70% in the last 14 years.

ROLF Lee CHRISTIANSEN
Rolf Lee CHRISTIANSEN