

Western Interior Alaska Subsistence Regional Advisory Council
c/o U.S. Fish and Wildlife Service
1011 E. Tudor Road, MS 121
Anchorage, AK 99503
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APR 03 2013

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APR - 8 2013

Eric Olson, Chair
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252

Subject: Chinook bycatch cap in non-pollock trawl fisheries

Dear Mr. Olson:

The Western Interior Alaska Subsistence Advisory Council (Council) is one of the ten regional councils formed under Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act (FACA). Section 805 of ANILCA and the Council's charter establish its authority to initiate, review, and evaluate regulations, policies, management plans, and other matters related to subsistence on Federal public lands and waters within the Western Interior Alaska region. The Council provides a forum for discussion and recommendations for subsistence fish and wildlife management in the region.

The Council met in Galena, Alaska, on March 5-6, 2013, and conducted a public meeting regarding subsistence issues. Among the topics discussed at this meeting were the recent Bering Sea salmon bycatch updates and the upcoming meeting of the NPFMC. The people of our region are deeply concerned about the bycatch levels, as the Western Alaska chum and Chinook salmon are essential resources we have been utilizing for generations. The low escapement levels in recent years and severely limited fishing openings have put a strain on our families and communities, many of which are not meeting their needs. Protection of these resources is critical to our way of life and all efforts should be made to rebuild and maintain our salmon stocks, including reducing direct impacts from the Bering Sea commercial fisheries.

Our primary concern is the Chinook bycatch cap in the non-pollock trawl fisheries in the Gulf of Alaska. We urge you to select the lowest proposed cap of 5,000 Chinook Salmon.

Eric Olson

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Thank you for the opportunity for this opportunity to provide input to your Council regarding critical issues of concern to our region; we look forward to continued discussions and dialogue. If you have any questions about this correspondence, please contact me via Melinda Hernandez, Subsistence Council Coordinator with OSM, at (907) 786-3885.

Sincerely,



Jack Reakoff
Chair

cc: Kathleen M. O'Reilly-Doyle, Acting Assistant Regional Director, OSM
David Jenkins, Acting Deputy Assistant Regional Director, OSM
Steve Fried, Fisheries Division Supervisor, OSM
Carl Johnson, Council Coordination Supervisor, OSM
Melinda Hernandez, Council Coordinator, OSM
Federal Subsistence Board
Western Interior Alaska Subsistence Regional Advisory Council
Administrative Records

king bycatch

Subject: king bycatch

From: "buck brown" <buck@xyz.net>

Date: 4/5/2013 4:35 PM

To: <npfmc.comments@noaa.gov>

I support lowering the king bycatch in the GOA to 5,000 kings in the pollock and non pllock trawl fisheries combined. please do the right thing and stop the excessive take of kings at a time of conservation.
thanks, warren brown, commercial fisherman

Subject: Alaska North Gulf Coast King salmon bycatch
From: James Mykland <jl_mykland@yahoo.com>
Date: 4/5/2013 8:48 AM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

To NPFMC,

My email to you, is addressing my concerns, about the King salmon bycatch, and your 25,000 cap, in the Gulf of Alaska. First of all, the 25K cap is way too high. It is not back by hard science and has no sustainable mitigating factors involved. Your 25K is an arbitrary number, pulled out of some person's hat, basically derived from voluntary catch records. I implore you to drop this cap to 5,000 or less. All chinook salmon returns, in Alaska, are seeing record low returns, during the last few years. Until ADF&G can get a handle on what is causing this serious situation, all chinook bycatch, must be curtailed or at least drastically reduced.

James Mykland
PO Box 1241
Cordova, AK 99574
907 331 8909

chinook bycatch cap

Subject: chinook bycatch cap

From: Gary Weglarz <gbossa_25@hotmail.com>

Date: 4/5/2013 7:15 AM

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

I adamantly support the proposal for the 5,000 Chinook bycatch cap and the mandate that all salmon bycatch is counted by an observer in the non-pollock trawl fisheries in the Gulf of Alaska. Our future is more important than short term financial gain. My vote will follow this issue, as well as the oil tax giveaway bill. The interests of all Alaskans should come first and foremost, not corporate interests.

King bycatch

Subject: King bycatch

From: Della Dempsey <dladmc@peopleagainstbs.com>

Date: 5/10/2013 3:14 AM

To: npfmc.comments@noaa.gov

I agree with a meaningful cap on king bycatch in the Gulf of Alaska for non-pollock trawl fisheries.

Della Dempsey

Wasilla

892-5876

Subject: bycatch mtg comments June 3 2013

From: "JIM ADAMS" <seinfeld@gci.net>

Date: 5/6/2013 10:11 AM

To: npfmc.comments@noaa.gov

Good morning,

I understand there are no limits currently to the bycatch of king salmon in the non-pollock fisheries in the Gulf of Alaska.

I am in support of bycatch limits of this fishery because no limits means waste and has detrimental effect on a sustainable resource.

Indiscriminate fishing (bycatch) has a negative ripple effect reaching far beyond the floating boats and processors area fishery. Further down the chain

of Alaska's fishing industry (set netters, sport fisheries, etc.) unlimited bycatch means less fish, less fishers, less business and lower economy, not to

mention the reduction in the meager numbers of fish caught for personal use. It also shows a disregard for maintaining a sustainable resource, important

to the State of Alaska and Alaskans.

I urge you to implement bycatch limits in the King Salmon fishery in the Gulf of Alaska. Bison once roamed the plains in uncountable numbers, we are fortunate they're still around.

Subject: C-4 GOA Salmon Chinook bycatch

From: Dave Atcheson <daveatcheson@hotmail.com>

Date: 5/16/2013 1:18 PM

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

Dear sir or Madam,

I am writing to say I strongly support reductions in Gulf of Alaska bycatch by the trawl fleet. I am asking the council to set a cap of 5000 Chinook salmon for non-pollack fisheries and want to see bycatch reduced further in future actions. These fisheries are the only fisheries with no limit on Chinook bycatch. Declining stocks of Chinook need to be addressed and this is one very significant way to address the issue.

Thanks You,

Dave Atcheson
P.O. Box 145
Sterling, AK 99672
907-398-4216

King Salmon by-catch by Trawl fishery

Subject: King Salmon by-catch by Trawl fishery

From: Larry Daniels <ldaniels@kikiktagruk.com>

Date: 5/5/2013 9:48 PM

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

Dear Commission,

The decline in king salmon returns in Alaska are alarming. Although the exact cause can be disputed, what cannot be disputed is that the trawl fisheries have a king salmon by catch. That by catch cannot continue to be wasted. When subsistence fisherman in Western Alaska and those along the Yukon are not allowed to fish due to low returns but trawlers are allowed to throw king salmon over board; that is not right. At the very least, by-catch kings should be shipped to the areas that are not getting enough fish, at the expense of the trawlers. If the trawlers can devise a way to reduce the by-catch, they will save money. If not, they will not succeed on the backs of the native subsistence fisherman.

By the same manner, halibut caught as by catch should be processed and the revenue given to the quota permit holders. The charter operators can be compensated from the commercial halibut quota. It should not be that difficult to be fair.

Larry Daniels

VP

Kikiktagruk Inupiat Corporation

Business-907.277.7884

Direct -907.433.5201

Mobile -907-229-2550

ExchangeDefender Message Security: [Check Authenticity](#)

king bycatch

Subject: king bycatch

From: Zack Scholze <zscholze@yahoo.com>

Date: 5/5/2013 4:58 PM

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

there needs to be cap on king bycatch it is a colossal waste

King Bycatch

Subject: King Bycatch

From: Bruce Graham <alaskangraham@yahoo.com>

Date: 5/5/2013 9:37 AM

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

There is no doubt that the king bycatch in the gulf of alaska needs to be limited and directly observed on all vessels. The future of the mighty king salmon depends on it. Take action NOW!

Bruce Graham
Alaskan Citizen

Sent from my iPhone

We are losing the Chinook fishery right before our eyes

Subject: We are losing the Chinook fishery right before our eyes
From: Bob Barndt <BARNDT@lac.lynden.com>
Date: 5/21/2013 9:02 AM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

NPFMC,

I would like to make some comments on the future of the Chinook Salmon in Alaska.

It looks like we have clear evidence that the "bycatch" of these fish are a direct cause of their disastrous low numbers. I know we (Alaskans) have known about this problem for some time...please read an excerpt from the final EIS in 2009:

From 1992 through 2002, the annual average Chinook salmon bycatch in the pollock fishery was 32,665 Chinook salmon. Chinook salmon bycatch numbers increased substantially from 2003 to 2007. The average from 2003 to 2007 was 74,067 Chinook salmon, with a bycatch peak of approximately 122,000 Chinook salmon in 2007. Chinook salmon bycatch in the Bering Sea pollock fishery decreased substantially in 2008 and 2009. The 2008 Chinook salmon bycatch estimate was 20,599 Chinook salmon. The preliminary estimate for 2009 is 12,410 Chinook salmon.

Bering Sea Chinook Salmon Bycatch
Final EIS – December 2009

It is clear to me we knew about this problem 4 years ago and we have did not correct it at that time. Still allowing the BSPF to harvest by catch levels of 25,000 fish before it is shutdown is absolutely unacceptable! Shut this fishery down until we figure out how to fix it....do not stand by a day longer and allow commercial pressure to destroy this fish!

My recommendation is a 5 year moratorium on all fishing be it Sport, Subsistence and Commercial until levels are again healthy. This has been a proven to be effective....All you have to look at is the success of the Deshka River closures that brought this fishery back. This will be a tough to do as Guides will be effected, Native folks who subsist on this fish and Commercial fisherman will need to bite the bullet during this moratorium. NO group will get a pass, this includes the BSPF Fleet, either they find a way to not catch these Salmon or they too are shut down for 5 years.

I am not a good letter writer and do not send a lot of these types of correspondences out, but feel this is a very critical time in the life of the most beautiful fish in our state and wanted to express my concerns....please please please, work hard to save them!!!!

Bob Barndt
You Everyday Sport Chinook Fisherman in Alaska
907-229-4887



CENTRAL COUNCIL
Tlingit and Haida Indian Tribes of Alaska
ANDREW P. HOPE BUILDING
320 West Willoughby Avenue • Suite 300
Juneau, Alaska 99801-1726

May 22, 2013

RECEIVED
MAY 24 2013

Mr. Chris Oliver
Executive Director
North Pacific Fisheries Management Council
605 W. 4th Avenue, Ste 306
Anchorage, AK 99501

RE: TA 13-23, Chinook Bycatch Reduction

Dear Mr. Oliver:

The 78th Tribal Assembly of the Central Council of the Tlingit and Haida Indian Tribes of Alaska (Central Council) convened in Juneau, Alaska on April 17-20, 2013, and adopted resolution TA 13-23, *Chinook Bycatch Reduction*. Central Council hereby submits the attached resolution to North Pacific Fisheries Management Council with the request the North Pacific Fishery Management Council take action to reduce Chinook salmon bycatch in the Gulf of Alaska and Bering Sea Pollock trawl fisheries and to put meaningful and effective Chinook salmon bycatch reduction limits on Chinook bycatch in the Gulf of Alaska non-pollock trawl fisheries.

The Tribal Assembly is the governing body of Central Council comprised of 132 delegates representing over 28,000 Tlingit and Haida Indians nationwide. The Tribal Assembly adopted resolutions that address the concerns of tribes, communities, and tribal citizens with regard to matters of health, human services, and governmental affairs. Resolutions adopted during Tribal Assembly are official tribal policy position issues and I respectfully request your assistance to ensure that the issues and concerns of our tribal citizens are addressed in a positive manner.

On behalf of Central Council, I thank you in advance for your prompt review and look forward to your response. If you have any questions, please contact my assistant Melissa Kookesh at (907) 463-7103 or mkookesh@ccthita.org.

Sincerely,

Edward K. Thomas
President

Enclosure



CENTRAL COUNCIL
Tlingit and Haida Indian Tribes of Alaska
ANDREW P. HOPE BUILDING
320 West Willoughby Avenue • Suite 300
Juneau, Alaska 99801-1726

CENTRAL COUNCIL OF TLINGIT AND HAIDA INDIAN TRIBES OF ALASKA
Seventy-Eighth Annual Tribal Assembly
April 17-20, 2013
Juneau, Alaska

Resolution TA/ 13-23

Title: Chinook Bycatch Reduction

By: Ketchikan Tlingit and Haida Community Council

WHEREAS, Central Council of Tlingit and Haida Indian Tribes of Alaska (Central Council) is a federally recognized tribe of more than 28,000 tribal citizens; and

WHEREAS, Alaska's Chinook salmon is of critical importance to the cultural, subsistence and community needs of Alaskan Natives; and

WHEREAS, Alaska's Chinook salmon support Alaska's commercial, charter and personal/traditional use fisheries; and

WHEREAS, Alaska's Chinook salmon runs have been declining for at least a decade; and

WHEREAS, Alaska's 2012 Chinook salmon runs were dramatically low, and disaster declarations were made for Upper Cook Inlet and the Yukon and Kuskokwim Rivers; and

WHEREAS, Alaska's 2012 Chinook runs were also of concern in Kodiak, Chignik, Prince William Sound and Southeast Alaska rivers; and

WHEREAS, in 2012, economic losses to the State of Alaska's commercial, charter and recreational fisheries were over \$34,000,000; and

WHEREAS, significant effects on traditional subsistence users and on The cultural and spiritual values of Alaskans is beyond economic assessment; and

WHEREAS, in 2012, traditional subsistence fisheries in the Yukon and Kuskokwim rivers were under severe restrictions and, despite those restrictions, many escapement goals were not met; and

WHEREAS, Chinook salmon stocks from Alaska are caught and discarded in the

Bering Sea and Gulf of Alaska pollock fisheries and other trawl fisheries in the Gulf of Alaska;
and

WHEREAS, Chinook salmon bycatch is a direct and controllable source of mortality for extremely valuable and declining salmon runs throughout the state; and

WHEREAS, the Chinook salmon bycatch caps for the Bering Sea pollock fishery is set at 60,000, and the Chinook salmon bycatch cap in the Gulf of Alaska pollock fishery is set at 25,000, and

WHEREAS, the other Gulf of Alaska trawl fisheries, other than the pollock fishery, currently operate without any bycatch limits; and

WHEREAS, the Bering Sea and Gulf of Alaska Chinook salmon bycatch allowance in the pollock trawl fisheries is more than 40% of the total catch of Chinook salmon in Southeast Alaska.

WHEREAS, Chinook salmon bycatch should be preserved and donated to food banks, shelters, churches, elders program, and native organization.

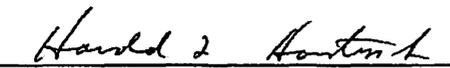
NOW THEREFORE BE IT RESOLVED, that the Seventy-Eighth Tribal Assembly of Central Council of Tlingit and Haida Indian Tribes of Alaska convened in Juneau, Alaska on April 17-20, 2013, hereby requests the North Pacific Fishery Management Council take action to reduce Chinook salmon bycatch in the Gulf of Alaska and Bering Sea pollock trawl fisheries and to put meaningful and effective Chinook salmon bycatch reduction limits on Chinook bycatch in the Gulf of Alaska non-pollock trawl fisheries.

ADOPTED this 20th day of April 2013, by the Seventy-Eighth Tribal Assembly of Central Council of Tlingit and Haida Indian Tribes of Alaska.

CERTIFY


President Edward K. Thomas

ATTEST


Tribal Secretary Harold Houston, Sr.

Homer Charter Association

P.O. Box 148 Homer, Ak. 99608

President: Gary Ault, Vice president Donna Bondioli, Secretary treasurer : Cerri Martin
Board members: David Bayes, Phil Warren, Alternates: Scott Glosser, Joe Symburski

May 23, 2013

Eric A. Olson, Chairman
Chris Oliver, Executive Director
North Pacific Fishery Management Council

C-4 GOA Salmon Chinook Bycatch

The Homer Charter Association (HCA) represents thirty charter companies and associated businesses from the Homer area. Its mission is to preserve and protect the sustainability of fishing rights and resources necessary for the Homer charter fleet to best serve the recreational fishery and our community.

The HCA strongly urges the council to take the action required to reduce Chinook Bycatch to the lowest levels possible in the Gulf of Alaska.

Sport fishermen, subsistence harvesters, Alaska residents and concerned consumers deserve improvements to our fisheries management system to reduce the waste of millions of pounds of valuable fishery resources as bycatch. Even from a solely economic perspective these impacts are unjustifiable as these bottom trawl fisheries target low value fish while the highly valuable Chinook Salmon are wasted. We Urge the Council to help save the Chinook salmon in all Alaska waters.

Chinook salmon have declined severely throughout Alaska: Commercial fishery failures and disasters were declared for the Upper Cook Inlet, Yukon River and Kuskokwim River.

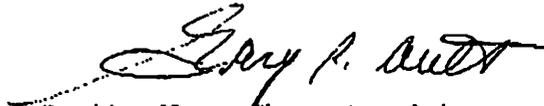
The Gulf non-pollock fisheries are the only fishery left which catches significant amounts of salmon bycatch, yet has no limit.

Chinook salmon is critical to subsistence, sport and commercial fisheries, and a major contributor to the economy and culture of Alaska.

All other users have to reduce their harvest to conserve Chinook salmon in years of low returns, the trawl fisheries must do the same.

The Homer Charter Association respectfully requests the council to take the action required to reduce bycatch and help save the Chinook salmon and other species threatened by it.

Gary Ault,


President Homer Charter Association

Petersburg Vessel Owners Association

PO Box 232

Petersburg, AK 99833

Phone & Fax: 907.772.9323

pvoa@gci.net • www.pvoaonline.org

May 28, 2013

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

RE: FINAL ACTION ON GOA CHINOOK SALMON BYCATCH IN NON-POLLOCK TRAWL FISHERIES, C-4.

Dear Chairman Olson and Members of the Council:

The Petersburg Vessel Owners Association (PVOA) is a diverse group of commercial fishermen that participate in a variety of fisheries throughout the State of Alaska and the North Pacific, including the under 60' GOA pacific cod (PCod) trawl fisheries. PVOA appreciates the opportunity to comment on the final action on GOA Chinook salmon bycatch in non-Pollock trawl fisheries.

At the outset, the Analysis is far too complicated and complex to allow for reasonable input, comments or conclusions on the positive or negative impacts of any one combination of choices. There are literally over 100 different possible combinations and permutations of alternatives, options and sub-options presented within the Analysis, each with different possible biological and economic outcomes. As we move through the Analysis, the "pie" is divided into smaller and smaller pieces and any reasonable ability to focus on the effects and outcomes of any one piece, let alone provide meaningful input on those effects and outcomes becomes nearly impossible. Prior to any final action, the Council really needs to develop a Preliminary Preferred Alternative (PPA) on this issue. A PPA would provide for a much more focused analysis on a more reasonable range of alternatives. We are concerned that the complexity of the current range of alternatives and options does not allow for sufficient and realistic analysis of the potential impacts, both positive and negative. The greater the complexity of alternatives, the greater the probability becomes of the Council making a serious error. That all being said, regardless of the final alternative selected, **Alternative 3: Full retention salmon, should be removed from the list of alternatives and be implemented as a functional requirement of any and all alternatives.**

PVOA supports the intent of National Standard 9, to minimize bycatch to the greatest extent practical, above all in fisheries where the bycatch may have direct negative impact on our members. However, it is difficult to do much about reducing bycatch in competitive fisheries, unless it is a gear modification that everybody uses, and/or a coop structure, with data from the fleet and a coop manager is needed. As was pointed out in the GOA Trawl Bycatch Management Program February 9, 2013 Council Motion: ***The current management tools in the GOA Groundfish Fishery Management Plan (FMP) do not provide the GOA trawl fleet with the ability to effectively address these challenges, especially with regard to the fleet's ability to best reduce and utilize PSC. As such, the Council has determined that consideration of a new management regime for the GOA trawl fisheries is warranted.*** With the GOA Trawl Bycatch Management Program moving forward, better tools will likely be made available when that process is finalized. Absent those sorts of tools, we believe that a reasonable solution would be to implement a higher number at first then drop the number when and if the bycatch program is implemented and the tools become available. That being said, we do recognize that setting a Chinook PSC cap below the maximum that has been taken over the past ten years would provide an incentive for avoiding areas and periods where high Chinook PSC is known to occur.

Implementing a Chinook PSC hard cap that is not abundance based also seems to be a bit arbitrary.

An issue that has been looked at for several years by Alaskan biologists and industry representatives to the Pacific Salmon Commission, is that there seemed to be a correlation between the GOA/BSAI trawl catches and the Southeast Alaska (SEAK) Chinook Abundance Index (AI) and that the trawl catch might be used as a "rough" early season indicator of the accuracy of the pre-season AI. Using linear regression analysis comparing the Chinook PSC data for 2003-2011 with the SEAK AI in those same years demonstrates a fairly weak correlation. However, when the West Coast Vancouver Island (WCVI) AI is included in the regression analysis correlation greatly improves and resulted in a regression coefficient greater than .50. So, it is apparent that GOA trawl Chinook PSC is likely driven by the abundance of southern Chinook stocks to an equal or greater extent than by the behavior of the trawl fisheries themselves.

An abundance based cap requires the robust sampling and representative sampling for scales, otoliths, coded-wire tags (CWT) and DNA. Unfortunately, such sampling up to this point has been deficient at best although opportunities for such sampling have actually existed for some time via onboard observers. Recent developments in GOA and BSAI genetic (GSI) sampling plans look to greatly improve the stock ID information but those projects are not yet fully developed nor the samples analyzed. Genetic sampling is an extremely easy process, requiring only small amounts of tissue, such as scales and scales used for GSI analysis and do not need to be sampled from the area of the fish normally preferred for scale aging. **Establishing full retention of salmon as a requirement under any alternative would greatly improve the number and**

availability of Chinook, not only for genetic samples but also CWT and age samples as well.

Setting a very low Chinook hard cap would likely not result in a significant savings on the individual stock level. During the ten year time period, 2003-2012, there were sixty-three individual hatcheries or wild stocks represented in the CWT GOA trawl Chinook PSC samples (Regional Mark Information System Data). The tag sites ranged from southern Oregon to Cook Inlet. These were individual sites, not tag groups. Although the sampling was not random or representative this shows that, at a minimum, at least sixty-three stocks from all along the west coast of the Pacific Northwest, B.C. and Alaska were vulnerable to capture. This does not take into account the CWT'd and un-tagged stocks that were either not recovered or not identified that were also in the catch. **It's highly likely that over one hundred stocks were actually rearing in the GOA and captured in the bycatch.** The implication of this is that, while it would appear there is substantial savings in the aggregate, the actual beneficial impacts to individual stocks would likely be insignificant and possibly even undetectable. If for example if the all GOA hard cap would have been five thousand in 2003 and assuming one hundred stocks in the mix, the aggregate savings would have been five thousand eight hundred seventy-seven Chinook but the average savings would have been fifty per stock. Average savings per stock is misleading (in that there's no such thing as an average year) but does show that on an individual stock basis, the savings would be minimal and for stocks where escapements are estimated, **it's likely that the savings would fall within the confidence limits of the escapement estimates and thus would be essentially undetectable.** However, since most of the Chinook PSC are two-ocean juveniles (from CWT recovery data) and not mature fish, the actual beneficial impacts to escapements would be even less. Given that the Alaska Department of Fish and Game estimates the natural mortality on that age fish at thirty percent and that a reasonable assumption is that at least fifty percent of the PSC is composed of two-ocean fish, **then the actual savings from a five thousand Chinook hard cap in 2003 would probably have been less than 4,000 fish.**

The forgone trawl harvest and economic loss to vessels and communities at a five thousand Chinook bycatch hard cap would be substantial. At a five thousand Chinook hard cap Table 4-61 in the Analysis gives an estimated foregone harvest of over forty-two thousand metric tons and Table ES-5 in the November 2012 Initial Review Analysis gives an estimated first wholesale loss of approximately sixty million dollars. At these estimated impacts, the cost per Chinook saved would be approximately eleven tons and fifteen thousand dollars. For central and western Alaskan stocks saved, assuming that approximately eighty percent of the Chinook PSC is not these particular stocks of concern, then the losses would be approximately fifty-two metric tons and seventy-five thousand dollars per fish. However, the actual forgone catch and economic loss would likely be much greater than this because the Analysis only looked at the "single year" annual impact and the impact of a very low Chinook PSC hard cap would likely have much greater impact on the long term economic viability of groundfish processors in Alaskan communities. Due to the regulatory uncertainties that would be unique to each season/regulatory year given a very low bycatch allowance, a

reasonable expectation of a minimum groundfish harvest necessary for processing to remain profitable would be jeopardy and could result in processing plants shutting down or greatly reducing their processing workforce...a situation that would be similar to Icicle Seafood's decision this year to cease operation of the Adak processing plant.

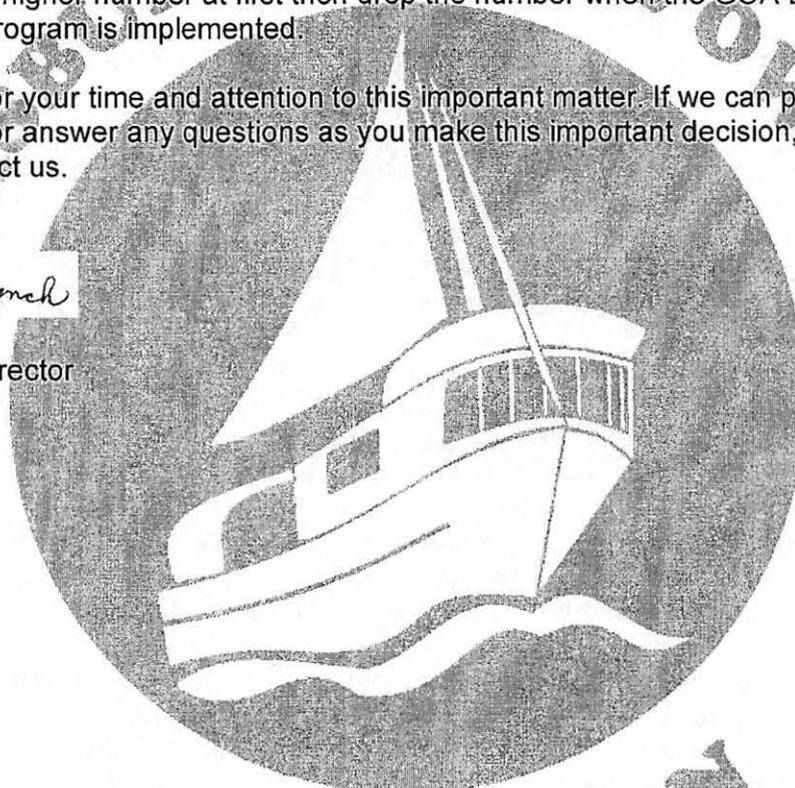
In conclusion, we recommend that the Council pursue a PPA because the complexity of the current range of alternatives and options does not allow for sufficient and realistic analysis of the potential impacts. A PPA would provide for a much more focused analysis on a more reasonable range of alternatives. We also recommend that, until the GOA Trawl Bycatch Management Program is implemented and better tools to reduce PSC are made available a reasonable solution would be to implement a higher number at first then drop the number when the GOA Bycatch Reduction Program is implemented.

Thank you for your time and attention to this important matter. If we can provide further information or answer any questions as you make this important decision, please feel free to contact us.

Sincerely,

Brian Lynch

Brian Lynch
Executive Director



ASSOCIATION

John Oscar
PO Box 2420
Bethel, Alaska 99559

May 28, 2013

North Pacific Fishery Management Council
605 West 4th Ave, Suite 306
Anchorage, AK 99510

Re: By-Catch

Dear NPFMC:

The impact to our fisheries is very evident in that we are unable to meet our subsistence resource practice, due to Chinook salmon by-catch by trawl fisheries in the Bering Sea. It is critical a cap be imposed to prevent further harm or threatens the population or extinction of a resource.

The Council should set a cap of 5,000 Chinook salmon for the non-pollock fisheries in the GOA as a starting point. Bycatch must be reduced further in future actions.

We do not want to experience another court imposed fines in the Yukon-Kuskokwim River. Our children should not have to suffer the lack of money we do not have to begin with. Our people are unnecessarily being made criminals.

Sincerely,
Ss/John Oscar

Paul Olson, Attorney-at-Law
606 Merrell St.
Sitka, AK 99835
polsonlaw@gmail.com

May 28, 2013

RECEIVED
MAY 28 2013

Eric Olson, Chairman
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252
npfmc.comments@noaa.gov
Fax: (907) 271-2817

Re: Agenda Item C-4 Chinook PSC Limits for Groundfish Trawl Fisheries

Dear Chairman Olson:

The Boat Company ("TBC") thanks the Council for its efforts to establish Chinook PSC limits for the Gulf of Alaska (GOA) non-pollock trawl fisheries and requests that the Council adopt stringent limits and direct NMFS to consider additional measures to address fisheries that have the greatest impacts on chinook. ADF & G has closed or restricted numerous chinook fisheries throughout the state and other chinook fisheries no longer support past levels of commercial, sport and subsistence harvests. Meanwhile, flatfish fisheries alone have already wasted more than 7,000 chinook this year, exceeding the historical average.¹

TBC is a tax exempt, charitable, education foundation with a long history of operating in southeast Alaska and conducts multi-day conservation and wilderness tours in southeast Alaska aboard its two larger vessels, the 145' M/V Liseron and the 157' M/V Mist Cove. Clients participate in various activities that include environmental education, kayaking, hiking, beachcombing and sport fishing. Clients who enjoy sport fishing activities particularly enjoy the opportunity to catch chinook salmon - the most important salmon species in terms of recreational value. Southeast Alaska chinook fishermen have also suffered from the ongoing population decline - there will be no directed fisheries for Taku River and Stikine River chinook this year and low bag limits and low commercial quotas. The small amount of chinook bycatch stock composition data collected over the years by NMFS suggests a substantial impact on southeast Alaska hatchery chinook, reducing the return on considerable investments in chinook stock enhancement through hatchery programs.²

Therefore, TBC supports the hard cap of no more than 5,000 Chinook and supports Options 1, 2, 3 and 4 because those options allow for more narrowly tailored management of chinook PSC by season, by location and by target fishery. The 5,000 fish limit is a necessary precautionary measure because NMFS is not able to determine the extent to which GOA trawl fisheries impact chinook that originate in southeast Alaska, chinook populations affected by the federal fishery disaster declaration or ESA-listed stocks. Further, the Council should ensure that NMFS statistically reliable PSC and stock composition data by directing NMFS, through this action, to implement 100% observer coverage and a census approach.

TBC also requests that the Council expand its evaluation beyond the economic analysis in the EA/RIR/IRFA which presents a speculative "worst case scenario" for federal fisheries that

¹ www.fakr.noaa.gov/2013/2013.htm (see Excel spreadsheets displaying PSC rates by gear, area, target fishery, week and sector).

² NMFS explains that existing data does not adequately represent PSC stock composition; but the available data the agency has shows that a significant portion of the Gulf of Alaska trawl chinook bycatch originates in southeast Alaska. See EA at 28-30.

would result from closures under the 5,000 and 7,500 fish limits and then contrasts forgone wholesale revenues under the worst case scenario with individual numbers of saved salmon. TBC requests that the Council's decision instead reflect an actual and ongoing worst case scenario for chinook salmon fisheries with millions of dollars in realized economic losses.

I. National Standard 9: The Council Should Select the 5,000 Fish Limit In Order to Actually Minimize Bycatch

National Standard 9 requires that "[c]onservation and management measures, shall, to the extent practicable, (A) minimize bycatch." 50 C.F.R. § 600.350(a). TBC requests that the Council adopt the 5,000 fish limit because it is the sole measure that reduces chinook bycatch from current levels. Further, TBC supports the implementation of Options 1, 2, 3 and 4 because the options allow for a more narrowly tailored bycatch management program that can better address specific problems on seasonal and target-fishery specific basis.

A. The Council Should Adopt the 5,000 Fish Limit In Order to Minimize Bycatch

The proposed amendment package would establish a PSC limit that implements a hard cap of 5,000, 7,500, 10,000 or 12,500 fish for the non-pollock fisheries. EA at 5. Previous efforts to establish chinook PSC limits have failed to minimize bycatch and instead prioritized flexibility for the groundfish fisheries. Amendment 93 established a 25,000 fish limit for the GOA pollock fisheries but authorized an actual increase over the historical annual average bycatch of 15,116 fish.³ Similarly, Amendment 91 to the Bering Sea and Aleutian Islands FMP adopted a 60,000 fish limit rather than the pre-2001 five year average of 29,323 chinook recommended by Yukon River fishery managers because NMFS prioritized flexibility for the pollock fleet to catch its quota instead of prioritizing reductions in chinook bycatch.⁴

The EA cites flexibility as a justification for increasing the range of limits under consideration to 12,500 Chinook in order to encompass maximum historical bycatch levels such as the reported take of 10,877 chinook in 2003. EA at 3. This approach does not minimize bycatch because the 12,500 fish limit would allow the non-pollock trawl fisheries to more than double the ten year average of 6,176 chinook. EA at 10. Thus, TBC requests that the Council adopt the 5,000 fish limit as the only option that would actually minimize PSC.

B. The Council Should Reject the Larger PSC Limits Which Reflect Historical Peak Years and Instead Set Limits Based on Current Relative Abundance

TBC also requests that the Council also consider declines in chinook abundance in setting the PSC limit rather than historical bycatch levels. Abundance based management governs fisheries that target chinook salmon. In 2008, the Science and Statistical Committee noted that chinook bycatch in the GOA fisheries was increasing but NMFS had not provided sufficient information to determine whether this trend was a conservation or economic concern and requested that bycatch trends be compared to trends in stock status.

Five years later, there is still insufficient information to evaluate the relationship between increased bycatch trends and declining population status. But it is likely chinook bycatch at lower population levels exacerbates already significant risks to long-term stock sustainability. For example, the 10,000 fish limit would not protect chinook populations until PSC reaches the historical peak level that occurred in 2003 when there were nearly twice as many fish available to directed fisheries. EA at 151,172. In other words, the reported take of 9,694 fish in 2010 and 6,902 fish in 2011 - the highest recent reported bycatch since 2002 and 2003 -

³ NMFS. 2012. Chinook Prohibited Species Catch in the Gulf of Alaska Pollock Fishery, Public Review Draft EA/RIR/IRFA at 23.

⁴ Fisheries of the Exclusive Economic Zone Off Alaska; Chinook Salmon Bycatch Management in the Bering Sea Pollock Fishery. 75 Fed. Reg. 53026, 53035-36 (August 30, 2010).

is much more significant now relative to overall chinook abundance because they are taking a larger percentage of a smaller and more fragile population. EA at 7. These same concerns also apply to ESA listed chinook; reportedly, the take of listed stocks in GOA trawl fisheries has declined.⁵ However, if listed chinook stocks are facing heightened extinction risks relative to the 1990s, the impacts of further removals – even if small – have increased potential to undermine recovery efforts.

Further, past decisions to set limits based on historical averages rather than in response to chinook abundance have failed to spare sufficient salmon to sustain directed fisheries. Over a five-year period from 2003 – 2007, BSAI pollock trawlers removed an average of roughly 80,000 chinook per year.⁶ The Yukon River commercial chinook fishery has been a declared disaster ever since (2008), with no fishery at all in 2012.⁷ Harvests of chinook stocks affected by GOA bycatch have declined significantly even as bycatch has increased. From 2003 – 2007 the average Alaska commercial harvest was 673,000 chinook; over the next five years that average dropped nearly in half to 378,000 fish. EA at 151. Sport fisheries have also experienced harvest declines of roughly 30% and have fallen to 117,664 fish in 2010 and 128,107 fish in 2011. EA at 149, 152. Given these declines, and the restrictive measures imposed for directed fisheries, the 5,000 fish limit is the only limit that responds to abundance-based management.

C. The Chosen PSC Limit Should Reflect Uncertainties

TBC requests that the limit selected by the Council reflect significant uncertainties regarding the long-term sustainability of the chinook resource. The precautionary approach adopted in the National Standard 9 regulations directs Councils to act cautiously when there is uncertainty regarding how a management measure relates to factors that range from population effects for the bycatch species to changes in the distribution of benefits and costs and social effects. 50 C.F.R. § 600.350(d)(3)(ii). This approach recognizes that scientific certainty often comes too late to design effective management responses.

The higher bycatch limits directly conflict with the regulation by authorizing increased levels of chinook PSC even though NMFS does not know whether or not federal fisheries are a significant contributing factor to the decline. The rationale for the higher PSC limits mirrors the approach taken in the Bering Sea which increased the allowable PSC over historical levels in order to respond to the “uncertainty and variability in Chinook salmon bycatch.” 75 Fed. Reg. at 53035-36. NMFS admits that it does not have ability to assess whether or not the agency’s management of Gulf of Alaska chinook bycatch “is, or is not, causing escapement failures in Alaska’s rivers.” EA at 50. Previous sampling rates can be measured in the thousandths of a percent and are primarily from the pollock fishery; NMFS has been unable to estimate relative abundance or harvested numbers of specific stocks. *Id.* at 25-27. According to the EA, the observer program will not be adequate to allow for offload sampling for the non-pollock trawl fisheries thus preventing any stock composition analysis. *Id.* at 26.

The risks associated with continued bycatch mortality levels are significant. Conservative management strategies for directed fisheries failed to improve escapements in western Alaska watersheds despite a “great cost to the people who rely on these resources for food and

⁵ NMFS. 2012. Endangered Species Act Section 7(a)(2) Supplemental Biological Opinion: Supplemental Biological Opinion Reinitiating Consultation on the January 11, 2007 Supplemental Biological Opinion Regarding Authorization of the Gulf of Alaska (GOA) Groundfish Fisheries. NMFS Salmon Management Division, Northwest Region. January 9, 2012.

⁶ See alaskafisheries.noaa.gov/sustainablefisheries/inseason/chinook_salmon_mortality.pdf.

⁷ Bell, S.K. 2012. Letter to Alaska Congressional Delegation at 2. State of Alaska Department of Commerce, Community and Economic Development. Anchorage, Alaska: November 8, 2012. Available at www.commerce.state.ak.us/decl/pub/FisheriesDisasterLetter.pdf.

income.” EA at 41. TBC requests that the Council members review the table of subsistence, sport and commercial fishery closures provided on page 158 of the analysis. For many of these stocks, the declines are an ongoing trend. The precautionary approach requires that policies manage risks so as to minimize serious or irreversible damage. Alternatives which increase rather than decrease PSC due to “uncertainty” do not conform to the precautionary approach which dictates conservative management through the 5,000 fish limit.

Finally, the Council should also act cautiously in setting PSC limits in order to account for underestimation of chinook bycatch. NMFS characterized its estimates of ESA-listed species in the GOA groundfish fisheries as “very minimum estimates.” EA at 47. Expert reviews show that NMFS underestimates chinook bycatch by a substantial amount even in more heavily observed fisheries.⁸ The more heavily observed CPs targeting flatfish and cod have a PSC rate two to three times as high as the marginally observed CVs. EA at 160. Thus, the 5,000 fish limit is an appropriate precautionary measure that accounts for uncertainties in bycatch estimates as well as stock of origin impacts.

D. The Council Should Adopt Options that Provide for Bycatch Management on a Seasonal and Target Fishery Specific Basis

Options 1, 2 and 4 apportion the limit between the western and central gulf reporting areas, by operational type and by sectors. EA at 5. TBC in general supports these options because it is essential to manage PSC at a fine scale in light of the uncertainties about the impact of PSC on rapidly declining chinook populations.

The EA also contemplates using either a five or ten year average for establishing limits under Options 1 and 2. Table 4-22 shows that over the past decade, NMFS has reported an increase in chinook PSC in the CGOA. EA at 159. The five year average would concentrate a higher amount of chinook PSC in the CGOA, and thus reward CGOA vessels for increasing PSC. The ten year average is an appropriate baseline because it disperses the mortality over a wider area, reducing the risk of disproportionate removals of specific stocks. Option 2, which would divide the cap between CPs and CVs, is also an appropriate measure because the CP fleet has more observer coverage, thus allowing for better enforcement of the limit.

Because of the high PSC rate for the spring arrowtooth and rex sole fisheries, TBC also supports Option 3 which would require that no more than 50% or 66% of the hard cap limit would be taken before June 1. *Id.* at 5. TBC also requests that the Council closely review pages 120 – 127 and 160 - 161 of the EA in considering the various options and particularly Option 3. The information provided on Gulf-wide salmon PSC indicates how, when and where the Council can further consider measures to reduce PSC based on target fisheries. Indeed, the Council can ameliorate the “worst case scenario” economic effects presented in the economic analysis by further modifying this action to set PSC limits on a finer scale – by season or by target fishery. The rex sole and arrowtooth fisheries are responsible for an early season spike in March and April when the weekly PSC averages are high. *Id.* at 23, 115. These two fisheries, from 2003 – 2011, took more than half of the chinook PSC. *Id.* at 121. The rex sole fishery has by far the highest overall PSC rate. *Id.* at 97. The arrowtooth fishery takes the largest number of Chinook, 1,789. *Id.* at 125. The 2013 PSC in these fisheries is substantially higher, creating an urgent and fishery-specific need to reduce PSC.

⁸ Pella, J., and Geieger, H.J. 2009. Sampling considerations for estimating geographic origins of Chinook salmon bycatch in the Bering Sea pollock fishery. ADF &G Special Publication No SP 09-08.

II. Regulatory Impact Review (RIR) and Impacts Analysis Need to Provide Equal Consideration to Salmon Fishery Closures

National Standard 1 provides that conservation and management measures are to achieve “optimum yield” to the fishery, meaning an amount of fish that “will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities” EA at 239. The RIR and other portions of the analysis provide a worst case scenario in which PSC limits would result in fishery closures with substantial wholesale revenue losses incurred by the federal groundfish fisheries. NMFS explains that it cannot estimate the extent to which salmon saved under the proposed PSC limits would benefit chinook user groups. *Id.* Thus, the agency did not provide a corresponding worst case scenarios provided that reflect the losses incurred by chinook user groups as a result of state fishery closures. As a result, the analysis does not fully inform the Council’s decision under National Standard 1. TBC requests that the Council’s decision instead reflect the economic costs associated with providing NMFS with the flexibility to waste in excess of 10,000 fish per year of unknown origin or significance as well as benefits associated with reducing PSC for other species. In the absence of this information, the national benefit determination will not reflect all appropriate economic considerations.

A. The Worst Case Scenario Analysis Maximizes Impacts to Groundfish Fisheries

The RIR analysis presents the “maximum potential impacts” and implies that trawl fisheries will forgo harvests of tens of thousands of metric tons of groundfish in order to achieve “salmon savings” of a mere few thousand fish. EA at 172, Table 4-61. The EA asserts that “[i]n general, forgone harvest impacts and forgone revenue impacts are strongly correlated.” EA 165. The worst case scenario largely entails PSC taken early in the lowest value groundfish fisheries causing the subsequent closure of higher value cod and rockfish fisheries later in the season. EA at 166, 172. Then, the analysis monetizes these maximum potential impacts in terms of wholesale values for groundfish fisheries. EA at 102-05.

Further, the analysis recognizes that “all estimates of forgone harvest may be overstated to a degree” because it assumes no changes in fishing behaviors in response to the limits. EA at 164. As the Science and Statistical Committee explained in 2011 with regard to the pollock fishery, if the limits encourage chinook avoidance efforts, the retrospective analysis overstates the revenue impacts and the suggested closure dates are earlier than what would have occurred. The Council could direct NMFS to ameliorate the worst case scenario economic effects discussed in the RIR. For example, the Council could consider apportioning PSC among target fisheries as a reasonable alternative that would allow for a more balanced distribution – and evaluation - of economic impacts. Another reasonable alternative would be to modify the seasonal progression of fisheries in a manner that shifts the economic impacts of mandatory bycatch minimization measures to lower value fisheries with high PSC rates.

An additional problem regarding the worst case scenario analysis is that it measures impacts solely on the basis of Chinook PSC rather than accounting for independent closures occurring as a result of halibut PSC exceedances. NMFS uses a “characteristic fishing year” to evaluate potential closures that would result from Chinook PSC limits. The EA discussed halibut PSC closures but then does not incorporate them into the characteristic fishing year. For example, the halibut PSC analysis indicates early season rex sole and arrowtooth flounder have high rates of halibut PSC and may be subject to early season closures in most years. The Council should direct NMFS to prepare additional analysis of economic impacts in its final environmental analysis that is not a “worst case scenario.”

B. Economic Value of Chinook and Worst Case Scenario for Chinook Fisheries

NMFS’ methodology of comparing significant costs to one fleet with minimal benefits to another fleet creates an unfair bias in favor of allowing for higher PSC limits. The key

problem is that the economic analysis emphasizes the worst case scenario for the trawl fisheries and ignores the worst case scenario for chinook resource users. The RIR explains that its analysis considers benefits for chinook salmon harvesters, processors and consumers but in "broader terms." EA at 164. The analysis ignores the cumulative effects of long-term salmon savings and the foreseeable possibility that Chinook fishery closures are in part attributable to disproportionate impacts on Alaska-origin stocks. The losses are not a mere matter of individual fish but rather are forgone revenues that result from fishery closures. Weak stock management dictates fishery closures regardless of NMFS' inability to determine whether the loss occurs in Homer, Sitka, Vancouver, B.C. or Portland, Oregon.

Further, the analysis failed to provide sufficient information about the economic value of chinook salmon – regardless of where any "saved" salmon spawned or were caught. The only figure provided is the ex-vessel value revenue for the chinook commercial fishery; there was little effort to monetize the value of sport fisheries. EA at 151-52. The economic analysis relies on uncertainty about stock composition and other sources of mortality to excuse the refusal to monetize or even quantify the benefits of reduced PSC or estimate the cost of taken PSC. EA at 198. The analysis failed to quantify the significant public investment in chinook recovery, enhancement and protection or acknowledge that many populations are at sufficiently low levels that higher PSC limits undermine those investments.

1. Economic Losses Caused By Reduced Harvests and Closures

The analysis limited its assessment of impacts to specific salmon saved without considering the relationship between salmon savings and saving salmon fisheries. The community impacts analysis focuses exclusively on ports for 90 groundfish trawl vessels to the exclusion of communities that host hundreds of commercial and sport fishing vessels that harvest Chinook salmon or communities that depend on returning Chinook for food. EA at 207-08. For example, in 2005, a healthier chinook resource provided enough commercially harvestable fish to provide substantial net national benefits - \$54 million in ex-vessel value, \$17 million in processor value and \$90 million in regional economic benefits.⁹ The ex-vessel value has since declined by two-thirds to \$17.6 million. EA at 151.

TBC requests that the Council consider the 2012 federal fisheries disaster declaration in its decision. The choice of PSC limits should reflect the real economic losses associated with salmon fishery closures such as the figures estimated by the state of Alaska in its updated estimates. Commercial fisherman lost \$16.8 million in direct revenue and \$9.9 million alone in Cook Inlet. Bell, S.K. 2012 at 2. In Cook Inlet alone, the state lost 29,630 angler days which would have generated \$17.7 million in direct and indirect spending. *Id.* at 3. The Kenai river harvest in 2012 was a mere five percent of the ten-year average. EA at 42.

It is these broader economic values, and not just individual salmon saved, that should be the relevant economic consideration for this decision - the existing and potential further loss of entire chinook fishery values. NMFS acknowledges that it has no idea whether or not trawl bycatch impacts specific stocks. But if – as is likely - trawlers are taking large amounts of a specific stock at certain times and places - modest amounts of salmon savings can significantly affect escapements and help to recover existing fishery economies.

2. The Commercial and Recreational Value of Chinook Salmon is Massive

The average annual commercial chinook harvest dropped from a five year average of 673,000 fish from 2003 – 2007 to 378,000 fish from 2008 – 2012. EA at 151. Using NMFS' measurement of impacts to groundfish fisheries – first wholesale value – the value of a commercially caught chinook increases to \$150 per fish.¹⁰ Under NMFS' approach of

⁹ North Pacific Harvests and Economic Value Measurement in 2005 to 2007 at 16.

¹⁰ See www.alaskaseafood.org/industry/market/seafoodweb_apr13/april13/Salmonvalue.html

comparing the wholesale value of one fishery to the ex-vessel value of another, at 5 cents a pound, the ex-vessel value of a metric ton of arrowtooth is worth roughly \$110.00, or less than the first wholesale value of an individual, commercially caught chinook or the ex-vessel value of two chinook. At a 2013 PSC rate that has been as high as nearly 3 chinook per metric ton, the arrowtooth fishery is a net national economic loss.¹¹

Further, although sport-caught chinook do not have a wholesale or ex-vessel revenue value, NMFS failed to seek out and include readily available economic information that would better inform the Council's determination of net economic benefits, particularly given National Standard 1's requirement to consider recreational values. For example, the Alaska Department of Fish and Game has calculated angler day expenditures at roughly \$282.00 per day, with nearly 1.7 million angler days in southeast Alaska marine waters and Cook Inlet alone in 2007.¹² A significant portion of those angler days were unquestionably spent targeting chinook salmon. A 2000 study by the McDowell group showed that southeast Alaska's hatchery program, which provided 7,000 chinook per year to sport anglers, generated \$8 million in economic input from non-resident harvest alone.¹³ Sport anglers do catch hatchery coho as well, but because the primary attraction is chinook, each southeast Alaska hatchery chinook – a primary component of known GOA bycatch - can easily account for \$1,000 in regional economic value. Combined, the values of the commercial and sport fishery contribute substantially more to the Alaska economy than many flatfish fisheries.¹⁴

Thus, because of the substantial commercial and recreational value of chinook, and because of the significant impact of increasing or maintaining historical PSC levels, TBC requests that the Council consider the broader economic benefits of the chinook fisheries, and the cost of fishery closures, rather than individual numbers of "salmon savings."

III. Monitoring and Enforcement Considerations: NMFS and the Council Need to Implement a Census for Chinook Bycatch

Alternative 3 requires full retention of salmon pending assessment of the number of salmon and collection of biological data. EA at 5. TBC requests that the Council address the chinook fishery crisis by implementing a census approach for the non-pollock trawl fisheries. In response to the similar decline in Yukon River fisheries, NMFS had concluded that it was necessary to "monitor all salmon bycatch by each vessel in the pollock fishery through a census, 100 percent observer coverage, and an expanded biological sampling program. 75 Fed. Reg. 53036. But for this action, NMFS will not take genetic samples from non-pollock fisheries. EA at 26. NMFS assumes that improved stock composition analysis in the pollock fisheries will provide "perspective" on PSC composition in other GOA trawl fisheries. *Id.*

NMFS needs more than "perspective" in order to address risks to coastal community economies dependent on the chinook fishery. In the meeting minutes for March and April 2011, the Council's Science and Statistical Committee explained that:

A large obstacle to fully describing and measuring the ramifications of these Chinook PSC avoidance measures is the incomplete scientific knowledge as to

¹¹ These figures were calculated based on the Fissel, B. et al, 2012 Economic Status of Groundfish Fisheries off Alaska, 2011, and a NMFS spreadsheet entitled "Standard Ex-vessel Prices for Groundfish Species for 2013 Observer Coverage Liability" indicating ex-vessel prices of \$.05 for arrowtooth, \$.13 for flathead sole and \$.29 for rex sole.

¹² Southwick Associates Inc. and W.J. Romberg, A.E. Bingham, G.B. Jennings, and R.A. Clark. 2008. Economic impacts and contributions of sportfishing in Alaska, 2007. ADF&G, Prof. Pub. No. 08-01.

¹³ www.dipac.net/RegionalPNPHatcherySummary.pdf.

¹⁴ The ex-vessel value of three flatfish fisheries with high levels of chinook bycatch – arrowtooth, rex sole and flathead sole, were \$3.4 million, \$1.8 million and \$.8 million, respectively. See *supra* note 12.

“source-of-origin” of the Chinook salmon PSC removals in the GOA pollock fisheries. Because the source-of-origin data are critical for any comprehensive economic analysis, the SSC recommends that a high priority be placed on efforts to identify and apportion Chinook PSC in the GOA to their natal source.

This priority also should apply to the non-pollock trawl fisheries. At previous observer coverage levels (which were higher than they are now), scientists have not been able to estimate impacts of GOA groundfish fisheries on western Alaska or other stocks of Pacific salmon.¹⁵ The observation levels made it impossible to monitor bycatch hot spots as has been done for the BSAI fleet.¹⁶ NMFS’ restructured observer program does not meet the 30% coverage level identified by the agency as a “minimum standard” and “least conservative” rate based on previous variance estimates and optimization analyses produced by the agency and other experts.¹⁷ Moreover, prior analyses showed that even the 30% coverage level was far below levels needed to achieve national precision performance standards for chinook bycatch estimates. Observer EA at 172 – 174. The most recent supplemental biological opinion for the GOA groundfish fisheries clearly assumed 30% observer coverage rates and recommended further improvements to address ESA considerations and meet salmon retention requirements. *See supra* n. 5.

But there is little assurance that the restructured observer program will replace current low deployment rates in the range of 13 – 15% with coverage levels needed to monitor and census chinook bycatch in a timely manner, meaning that NMFS will continue to be unable to obtain the stock composition data necessary to determine effects on Chinook populations and user groups for the foreseeable future. In light of the severity of the Chinook fishery disaster, the Council should modify this action so as to implement an industry funded, pay as you go 100% observer program for the non-pollock trawl fisheries in order to improve the precision and accuracy of chinook bycatch estimates and knowledge of stock of origin data even if it requires diverting funds from other programs given the marginal contribution of the flatfish fisheries to the observer program.¹⁸ As pointed out in an expert review, “an overall accounting of bycatch removals by its regional geographic origins is needed, possibly stratified by vessel categories,” leading to a recommendation for a census-like approach, which “is simple, easy to explain, and has the advantage that it is free of sampling error.”¹⁹

Conclusion

TBC thanks the Council for acting on Chinook PSC and supports Alternative 2 using a 5,000 fish limit, ten-year baseline and implementing all options. TBC also requests that the Council carefully consider the economic value of chinook, cost of fishery closures, and also modify Alternative 3 and adopt a census approach in order to respond to the urgent need for better data collection on the amount and stock composition of chinook PSC.

Sincerely,

Paul Olson, Attorney-at-Law

¹⁵ Witherell, D., D. Ackely & C. Coon. 2002. An Overview of Salmon Bycatch in Alaska Groundfish Fisheries. Reprinted from the Alaska Fishery Research Bulletin, Vol. 9, No. 1, Summer 2002 at 62.

¹⁶ *Id.* at 61.

¹⁷ NMFS. 2012. Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for Proposed Amendment 86 to the Fishery Management Plan for Groundfish of the Bering Sea/Aleutian Islands Management Area and Amendment 76 to the Fishery Management Plan for Groundfish of the Gulf of Alaska (hereinafter Observer EA) at 180.

¹⁸ In 2012, NMFS recalculated the ex-revenue value fees for the observer program and found that rex sole, arrowtooth flounder and flathead sole target fisheries would contribute only \$31,000.

¹⁹ *See supra* n. 9.



Gulf of Alaska Coastal Communities Coalition

PO Box 201236, Anchorage Alaska 99520

Phone: (907) 561-7633 Email: goaccc@alaska.net

May 28, 2013

Eric Olson, Chairman
North Pacific Fisheries Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501-2252
npfmc.comments@noaa.gov
Fax: (907) 271-2817

RECEIVED
MAY 28 2013

Subject: Agenda Item C-4 Chinook Bycatch

Dear Mr. Olson:

GOAC3 represents the interests of 42 coastal communities more than 20 of which are in the Central and Western Gulf.

Chinook salmon are very important to all of our communities and everyone is keenly aware that Chinook are nearly everywhere suffering low escapements. With that in mind GOAC3 is strongly inclined to recommend the lowest cap of 5,000 however we understand that would be very painful for the trawl fleet. Taking that into consideration GOAC3 is willing to recommend some flexibility – as an example: a 5,000 cap but with some flexibility to reach a maximum of 7,500 in no more than 2 out of five years.

Sincerely,

Charles "Chuck" McCallum
Executive Director, GOAC3

Our Mission is to support, enhance, and protect the fishing villages of the Gulf of Alaska; and to promote the education and capacity of resident fishermen and their communities to adapt to the challenges created by environmental, legal, financial, business, political, and regulatory change.

Eric Olson, Chair
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501

RE: Agenda Item C-4: GOA Salmon Chinook Bycatch

May 27, 2013

Dear Chairman Olsen & Council Members:

Thank you for the opportunity to provide input to the Council on Chinook Salmon Bycatch in the GOA non-Pollock trawl fisheries.

My name is Patrick O'Donnell, I have been involved in the trawling industry in Kodiak for 23 years now, I own the F/V Caravelle which is an 85 foot trawler homeported in Kodiak, of which 75% of my crew are also from, it is a family owned vessel where my kids age 14 and 10 fish with me every summer in the flatfish fishery and have done so since they were very little. The flatfish fishery is a very important part of my overall fishing plan for the year as well as my personal goal to give my children the ability to work in the summer in order to educate and structure them as earners for their own future.

Chinook salmon is a hot topic right now and yes something has to be done about it, however there is no relationship between salmon bycatch in the non pelagic trawl industry and the low returns to the Alaskan rivers, I believe that this is a political decision right now with a lack of scientific data to support it.

Putting a cap in place in the trawl industry right now is going to intensify the race for fish which in turn will lead to different fishing practice's as we will always worry that the fishery may close down due to somebody else's behavior within their fishery.

It is the desire of the trawl industry to implement some sort of Catch Share Plan in order to manage our fishery as we do so in the Rockfish Program. As one who is opposed to catch shares of any sort the road has already been paved, I see no other way forward other than catch shares or a bycatch management system where we can control and protect our livelihood, it is at this time when we should be looking at caps on Chinook salmon based on the scientific data to support them as stated under National Standard 2.

Another consideration on the declining runs of Chinook salmon returning to the rivers is the actual user groups themselves, we all know there is a high bycatch of Chinook in the purse seine salmon fishery and gill net salmon fishery around Alaska. What are the measures taken here to avoid bycatch? Also, what are the impacts to the runs returning to the rivers?

These fisheries take place a lot of times at the mouth of the rivers where we know they are returning Chinook salmon, not offshore as we have in the trawl industry, you also have the subsistence and the sport fishing side of the industry. What management measures are in place here, and how well monitored is it, everybody is playing a role here it is just not the trawlers that are having an impact.

The Council should consider what the impacts are going to be to the community of Kodiak if a cap is put in place and we do not have enough salmon to continue fishing into the year, how will it affect the community as a whole.

We the trawl industry can only do so much as far as avoiding salmon, environmental & ocean conditions, feed conditions, and current and water temperature need to be looked at and see what affects this is having on the salmon stocks.

We are capped under the pollock fishery and it has yet to be seen whether or not we will make it through the remaining C&D pollock season before the cap is reached.

I would like to see the Council hold off on this action until we have data to support the decision to put caps in place, if we had data supporting caps I would not ask for this.

In the event that a cap is put in place then you should see to it that there is a high enough cap so as not to cripple the trawl industry. We know what conditions are like today as far as abundance of Chinook in the GOA and should consider the effects and impacts if this abundance increases over time and into the future.

Alaska is the poster child as far as successful management of its fisheries based on scientific data so I would ask that you don't cave due to political pressure versus science.

Sincerely,

Patrick O'Donnell

Subject: Re: Chinook Bycatch Agenda Item C-4
From: bill heiberger <bill.heiberger@gmail.com>
Date: 5/8/2013 10:30 AM
To: npfmc.comments@noaa.gov

Second Attempt to Send

On Wed, May 8, 2013 at 2:19 PM, bill heiberger <bill.heiberger@gmail.com> wrote:

I am writing with respect to Agenda Item C-4 Chinook Salmon Bycatch.

I have been concerned with the very significant reduction of Chinook and also in their size over the last 10 years. One thing we can and should do is to severely limit the bycatch of this species. I support a TOTAL bycatch limit for this species across all fisheries of 7,000 fish.

Fish are to be managed for the good of ALL the people, not just a select few that have the means to harvest large numbers of them.

Best Regards

Bill Heiberger

No affiliation other than a sports fisherman and retiree. Dated 7 May 2013

Subject: Bycatch in AK

From: "McDonough, Amber" <amber.mcdonough@siemens.com>

Date: 5/6/2013 9:00 AM

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

Hello,

Please add me to the long list of citizens that think a cap on the amount of king salmon bycatch allowed by trawling fisheries should be reduced significantly to preserve king runs for Alaska residents and guides. The value of these fish per pound when caught as a sport fish far exceeds its per pound value as a commercial or bycatch harvest.

Thank you,

Amber McDonough
200 W 34th Ave #371
Anchorage, AK 99503

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May 28, 2013

North Pacific Fishery Management Council
605 West 4th Ave., Suites 306
Anchorage, AK 99501

To North Pacific Fishery Management Council:

Ahtna Customary and Traditional Use Committee (C&T Committee) and Ahtna, Inc represent 8 Ahtna Villages in the Ahtna Region. The villages are Cantwell, Chistochina, Chitina, Gakona, Gulkana, Mentasta, Native Village of Kluti-Kaah and Tazlina. Ahtna, Inc. strongly supports reductions in the Gulf of Alaska Chinook salmon Bycatch in all trawl fisheries.

We urge this Council to take the following actions:

Set a cap of 5,000 Chinook salmon for the non-Pollock fisheries in the Gulf of Alaska as a starting point. Bycatch must be reduced further in future actions.

The Gulf non-Pollock fisheries are critical to subsistence, sports and commercial fisheries, and a major contributor to the economy and Alaska Native cultures in Alaska.

All other users have to reduce their harvest to conserve Chinook salmon in years of low returns; the trawl fisheries must do the same.

The National Standard 9 of the Magnuson-Stevens Act requires that Bycatch be reduced.

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Chinook salmon have declined severely throughout Alaska. In the Prince William Sound/Copper River District, Chinook salmon populations in the Copper River have been on a downward spiral decline for the last 4 years. The harvest limits of Chinook salmon in the Copper River District for the Sports Fisheries and Personal Use have been restricted within the last 2 years. Subsistence Fisheries in the Upper Copper River District may also be restricted in the future, if Chinook salmon population continues to decline.

Chinook salmon is a chief subsistence food to the Ahtna People. We are concerned about the declining Chinook salmon population in the Copper River region. Action must be taken to ensure the sustainability of Chinook salmon in the Copper River/Prince William Sound areas.

Please take action and set a cap of 5,000 for Chinook salmon for the non-Pollock fisheries in the Gulf of Alaska.

Sincerely,

Gloria Stickwan

Gloria Stickwan
C&T/Environmental Coordinator

May 28, 2013

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Re: Gulf of Alaska Chinook Bycatch (Agenda Item C-4)

Dear Chairman Olson & North Pacific Fishery Management Council,

As commercial fishermen, sport fishermen, subsistence harvesters, Alaska residents and concerned consumers, we demand improvements to our fisheries management system to reduce the waste of millions of pounds of valuable fishery resources as bycatch.

Many king salmon, halibut and crab populations in Alaska are in trouble. Disaster declarations have been issued for king salmon in southcentral and western Alaska. Halibut catch limits in the commercial fishery have been reduced by up to 70% in some areas. The bag limit in some recreational fisheries has been reduced by half. The catch limit for the 2013 Kodiak Tanner crab fishery is the second smallest on record.

Our jobs, local economies, communities, fishing opportunities, access to traditional foods, and ways of life are harmed by these declines. Yet, millions of pounds of halibut, tens of thousands of king salmon, and thousands of pounds of Tanner crab are legally killed every year as bycatch. This bycatch body count – primarily attributed to a handful of trawl fisheries – is unjust to those whose fisheries have been shut down or had quotas slashed due to low abundance.

Recent actions by the North Pacific Fishery Management Council to reduce king salmon and halibut bycatch have not gone far enough. Managers can and must do better. Our jobs, our livelihoods and the future of our fisheries depend on it.

We call on our decision makers to exercise your influence and use your authority to achieve strong and meaningful bycatch reduction now.

FIRST	LAST	AFFILIATION	ADDRESS	CITY	ST	ZIP
Eben	Brown	F/V Adrenaline Force	205 Crego Hill Rd.	Chehalis	WA	98532
Stephen	Barnes	F/V Taylor Maid	PO Box 332	Cordova	AK	99574
Todd	Querby	F/V Shodan	7910 50th Ave. CT NW	Gig Harbor	WA	98335
Sandra	Earle	Bird Rock Fishery	5642 40th Ave. W.	Seattle	WA	98199
Ezekiel	Brown	Commercial Fisher	PO Box 782	Cordova	AK	99574
Kim	Collins	Commercial Fisher	PO Box 1734	Cordova	AK	99574
Adrian	Bear	Subsistence	PO Box 245	Sutton	AK	99674
Daniel	Earle	Commercial Fisher	5642 40th Ave. W.	Seattle	WA	98199
Don	Martinson	Commercial Fisher	15105 59th Pl. W	Edmonds	WA	98026
Dan	Strickland	Commercial Fisher	5992 N. Nodding Ave.	Palmer	AK	99645
Dan	Folgy	Commercial Fisher	PO Box 22174	Juneau	AK	99802
Phil	Lansing	Commercial Fisher	743 Santa Paula Ct.	Boise	ID	83712
Dave	Kubiak	Commercial Fisher	PO Box 193	Kodiak	AK	99615
Erik	Kubiak		1365 E. 13005	Salt Lake City	UT	84105
Stephen	Furman	Commercial Fisher	801 W. Holland Dr.	Wasilla	AK	99654
Fred	Manikovich	Commercial Fisher	8721 137th St. NW	Gig Harbor	WA	98329
Germaine	Thomas	Commercial Fisher	1852 E. 24th	Anchorage	AK	99508
Boyd	Selanoff	Commercial Fisher	2668 SW 41st	Graham	OR	97080
Andrew	Wones	biologist, seafood consumer	11104 320th Ave. NE	Carnation	WA	98014
Tim	Pine	F/V Raven	3205 Arctic Blvd.	Anchorage	AK	99503
Nate	Thomas	F/V Obsession	1909 I St., #1	Bellingham	WA	98225
Lindsie	Fratus	Watershed Restoration Coordinator Nooksack Indian Tribe	1901 I St.	Bellingham	WA	98225
Zachary	Nehus	St. Dominick, Brianna Lynn	PO Box 1334	Unalaska	AK	99685
Dustin	Connor	Bristol Bay Commercial Permit Holder	PO Box 1124	Petersburg	AK	99833
Tiffanie	James		1303 Texas St., #202	Bellingham	WA	98229
Jordan	Belmont		1206 Peters Ln.	Mt. Vernon	WA	
Eliza	Stevens		8322 NE 166th St.	Kenmore	WA	98028
Jeff	Pike	F/V Fishalot, Commercial Fisher Bristol Bay	PO Box 213	Bellingham	WA	98227
Hayley	Monsen		PO Box 213	Naknek	AK	99633
Trevor	Norton		PO Box 3282	Kodiak	AK	99615
Anne	Mosness		34 Rocky Ridge	Bellingham	WA	98229
Kelsey	Hawley		PO Box 2308	Cordova	AK	99574
Anne	Linville		377 N. 30th St., Apt. C303	Boise	ID	83702
Pete	Wedin	Capt. Pete's Alaska	P.O. Box 3353	Homer	AK	99603
Jeremy	Brown		3503 Wyoming dr	Anchorage	AK	99517
Ron	Thompson	F/V Northern Jaeger	P.O. box 567	Kodiak	AK	
Joel	Brady-Power		5 Lost Lake Lane	Bellingham	Wa	98229
Mary	Miceli		POB 671294	Chugiak	AK	99567
Bruce	Jolma	SO3T permit holder	460 ne alder st	Clatskanie	OR	97016
Christopher	White	f/v Vulcan	953 Janish Dr	Sandpoint	ID	83864
Warren	brown	seldovia	1594 murray circle	seldovia	AK	99663
Morris	anderson		box 2093	Kodiak	AK	99615
Dora	Sigurdsson		6940 Chad Street	Anchorage	AK	99518
Tim & Jodi	Evers	Ninilchik	168350 Sterling Hwy. S.	Ninilchik	AK	99639
John	skeele	normar,inc	262 kaagwaantaan st.	sitka	AK	99835
Donna	Donohoe			Sitka	AK	99835
Peter	thompson	commercial and sport fisherman	PO Box 3037	Kodiak	AK	99615
Nevette	Bowen	Yakutat Setnetter		Petersburg	AK	99833
Mary Pat	Schilly		4435 N. Douglas Hwy.	Juneau	AK	99801
Daniel	Miller	F/V Anna D	Box 2865	Kodiak	AK	99615
Claire	Pywell		3405 6th St.	Anchorage	AK	99517
Michael	Kashevarof		11173 bluff creek cir	Anchorage	AK	99515
Alan	parks		65055 nearly level ave	Homer	AL	99603
David	Therault		3805 Carolina Dr Apt 1	Anchorage	AK	99517
Dawn	Biddison		119A E 13th Ave	Anchorage	AK	99501
Wendy	Loya		32459 Eagle River Rd	Eagle River	AK	99577
Gordon	Wetzel		4235 Birch Run Dr	Anchorage	AK	99507

Debbi	Freeze		525 Pine Street #8	Mount Shasta	CA	96067
Nava	Sarracino	Holistic Health	561 Sesame Street	Anchorage	AK	99501
Jo	Clark	Alaska Center for the Environment	5305 E Iroquois Court	Wasilla	AK	99654
Jane	Martinez		PO Box 113201	Anchorage	AK	99511
KAtrina	Seater		13250 Stephenson st	Anchorage	AK	99515
Crawford	Parr		P.O. Box 220624	Anchorage	AK	99522
Robert	Linville	Dutch Lady Fisheries, LLC	PO Box 1753	Seward	AK	99664
Sharon	Lowe	Center for the Environment	2100 Minerva Way, Unit A3	Anchorage	AK	99515
Roxy	McDonagh		402 East 23rd Avenue	Anchorage	AK	99503
Denise	Greger		327 Mumford St	Anchorage	AK	99508
Christopher	White		953 Janish Dr	Sandpoint	ID	83864
Art	Kolter		P.O. Box 20414	Juaeau	AK	99802
Peg	Tileston		4780 Cambridge Way	Anchorage	AK	99503
Gerald	Brookman		715 Muir Avenue	Kenai	AK	99611
Charles	Madsen	Kodiak	12262 Russian Creek Rd.	Kodiak	AK	99615
Chuck	Carpenter	commercial fisherman	4739 Mermont pl.	Everett	WA	98203
Warren	Brown		1594 Murray circle	Seldovia	AK	99663
Craig	Matkin	North Gulf Oceanic Society	3430 Main St Ste B1	Homer	AK	99603
D Caldwell	Jones	Sitka Sound	P. O. Box 6205	Sitka	AK	99835
Richard	Andrews	Resouces	12621 Saunders Road	Anchorage	AK	99516
Amanda	Grondin	F/V Duna	1450 30th Street	Port Townsend	WA	98368
George	Matz		PO Box 15182	Fritz Creek	AK	99603
Susan	Baker	Kodiak	43336 Chiniak Highway	Chiniak	AK	99615
James	Moody		P.O. Box 1643	Ward Cove	AK	99928
Terry	Hoefflerle		4001 Mallard Lane	Dillingham	AK	99576
George	Donart	Commercial Fisherman	917 W. 20th Ave.	Anchorage	AK	99503
Darius	Kasprzak	Kodiak	807 Jackson Lane	Kodiak	AK	99615
Everett	Thompson	Naknek	183 Estrada Circle	Naknek	AK	99633
Bryan	Kirkpatrick		12940 Hillside Dr.	Anchorage	AK	99516
Patricia	Delate	Kodiak	816 B Steller Way	Kodiak	AK	99615
Maureen	Knutsen		PO Box 134	Naknek	AK	99633
Peter	Hannah		1225 W Kouskov	Kodiak	AK	99615
Colleen	Underwood		1670 Botwood Lane #101	Cowichan Bay	BC	V0R 1N0
Carol	Woody	Fisheries Research and Consulting	6601 chevigny st	Anchorage	AK	99502
Andrea	Hernandez	Point Baker	PO Box 48	Point Baker	AK	99927
Donald	Hernandez	Point Baker	PO Box 48	Point Baker	AK	99927
Sarah	Short		1228 Father Herman St.	Kodiak	AK	99615
Yukonna	Norman	Kenai	48903 sirocco dr	Soldotna	AK	99669
Gary	Sampson	Kodiak Sportsman's Lodge	P.O. Box 155	Old Harbor	AK	99643
Karian	Bachmann	Fairbanks, AK				
Bryan	Duszynski	Kaltag	1515 Alaska Way	Fairbanks	AK	99709
Jonah	Cloud		3214 SE 56th Ave	Portland	OR	97206
Lindsay	Monty		P.O. Box 3344	Fairbanks	AK	99775
Stephanie	Spokas		15 Ohio Gulch Rd	Clancy	MT	59634
Mike	Spokas		15 Ohio Gulch Rd	Clancy	MT	59634
Donna	Donoho		1315A SMC Rd.	Sitka	AK	99835
Greg	Demers		PO Box 2612	Homer	AK	99603
Kristen	Johnson	Student		Washington	DC	20064
KENNETH	folmar	RUNNAMUCK CHARTERS	1424 mission rd.	Kodiak	AK	99615
Daniel	Miller	F/V Anna D	3214 Spruce Cape Rd	Kodiak	AK	99615
Margaret	Bosworth	Kodiak Salmon Permit Holder	PO Box 1803	Kodiak	AK	99615
Mike	Adams	Cooper Landing	PO Box 847	Coper Landing	AK	99572
Mike	Huff	Captain mikes charters	PO Box 269	Homer	AK	99603
Mackenzie	Peterson	f/v Kerna Sue	1850 three sisters way	Kodiak	AK	99615
Charles	Peterson	F/V Patricia Sue	1850 three sisters way	Kodiak	AK	99615
Charles Jr.	Peterson	F/V Patricia Sue	1850 three sisters way	Kodiak	AK	99615
Theresa	Peterson	F/V Patricia Sue	1850 three sisters way	Kodiak	AK	99615
James	Skonberg Sr.	Ouzinkie	PO Box 70	Ouzinkie	AK	99644

Pete	Hannah	Kodiak	1225 w. Koskov	Kodiak	AK	99615
Neil	Rickman	aja	PO Box 2872	kodiak	AK	99615
Naphtali	Fields	Kodiak	4022 Cliffside Dr	Kodiak	AK	99615
Darius	Kasprzak	F/V Marona	807Jackson Lane	Kodiak	AK	99615
Michael	Kashevarof		11173 Bluff Creek Circle	Anchorage	AK	99515
Tim & Jodi	Evers		16835 Sterling Hwy. South	Ninilchik	AK	99639
Karlan	Bachmann			Fairbanks	AK	
Jamie	Kindt		PO BOX 283	Ashford	WA	98304
John	Gillam		Box 15353	Fritz Creek	AK	99603
Bob	Shavelson	Cook Inletkeeper	PO Box 3269	Homer	AK	99603
Alan	Meltzer		5256 Boque Lane #15	West Palm Beach	FL	33415
G. Steele	Davis	Spirit of Alaska Wilderness Adventures	71 Uyak Square	Larsen bay	AK	99624
Gary	Ault	Inlet Charters	PO Box 2083	Homer	AK	99603
Megan	Sharkey		2131 West 80th Ave	Anchorage	AK	99502
D Caldwell	Jones	Sitka Sound	PO Box 6205	Sitka	AK	99835
Luke	Bunnell	Former commercial fisherman	8440 Mentra CRT	Anchorage	AK	99518
George	Matz		PO Box15182	Fritz Creek	AK	99603
David	Beebe	Greater Southeast Alaska Conservatipn Community	606 Merrill St.	Sitka	AK	99835
Erica	Aus		PO Box 1224	Unalaska	AK	99685
Charles	Madsen	Kodiak	322 Shelikof Suite B	Kodiak	AK	99615
Israel	Payton		7702 Stillwater Cir	Wasilla	AK	99623
steve	Branson	crewmens association	PO Box 451	kodiak	AK	99615
John	Skeele	f/v sunfish	262 kaagwaantaan st.	Sitka	AK	99835
Jordan	Pond	Sport fishing first	Po box 2981	Valdez	AK	99696
Loren	Peterson	Alaska Conservation Foundation	911 West 8th Ave.	Anchorage	AK	99501
Don	Dumm	Horseshoe Bay LLC	818 Stellar Wy.	Kodiak	AK	99615
Steven	Stampka		1379-West Fourth Str.	Winona	MIN	55987
David g.	Skroch		18581 ervin st.	whitehall	WI	54773
Scott	Myers	Personal Use fishing	4308 Baxter Rd #6	Anchorage	AK	99504
Andrew	Lundquist		PO Box 589	Kodiak	AK	99615
Greg	McIntosh	Self / Recreational King Salmon Fisherman	301 Mainland	Halibut Cove	AK	99603
Steve	Branson	Crewmen's Association	PO Box 451	kodiak	AK	99615
Patricia	Heyano		PO Box 83	Aleknagik	AK	99555
Craig	Kasemodel	Concerned fishing citizen	3813 Hampton Drive	Anchorage	AK	99504
Jeff	Farvour	commercial fisherman, sitka	439 verstovia ave	Sitka	AK	99835
Will	Schlein	Subsistence, Consumer	304 W. Pioneer	Homer	AK	99603
Leslie	Mastick	Commercial/Subsistence	64436 Sheep Dr.	Homer	AK	99603
Erika	Klaar	Subsistence, Consumer	4101 University Dr. #633	Anchorage	AK	99508
Ryan	Lee	Concerned Consumer	40680 Heather St.	Homer	AK	99603
Michael	Macaluso	Commercial Fisherman	41297 Heather St.	Homer	AK	99603
Michael	Callahan	Sport Fishing	3814 West 43rd Ave. Unit A	Anchorage	AK	99517
Jacob	Voss	Sport Fishing	3814 W. 43rd Ave. Unit A	Anchorage	AK	99517
Robert	Blakney	Consumer Sport	3325 Monticello Ct.	Anchorage	AK	99503
Fred Jay	Meyer	Sport/Consumer	23 Payson Rd.	Falmouth	ME	04105
Barry	Christenson	Sport/Consumer	P. O. Box 263	Windon	MIN	56101
Jim	Cunningham	Miss Margo Crew Cordova/Consumer/Subsistence	2264 Knoll Cr.	Anchorage	AK	
Nalani Kay	Schroeder	Interested in All	36540 Spruce Circle Rd.	Anchor Point	AK	99556
Andrea	Huyck	Sport/Subsistence	P. O. Box 153213	Fritz Creek	AK	99556
George M.	Kennedy	All	844 Ocean Dr. Loop	Homer	AK	99603
Christy	Martinez	All	4178 Kachemak Way	Homer	AK	99603
Jesse	Lee	F/V Realist	468 Rainbow Court	Homer	AK	99603
Lindsay	Wolter	Sport/Seafood/Consumer/Concerned Citizen	P. O. Box 3519	Homer	AK	99603
Fred	Currier	F/V Tonsina	Box 3667	Homer	AK	99603
M	Glasgow	Subsistence Provider	P. O. Box 15419	Fritz Creek	AK	99603
Michelle	Smith	Comm. Fishwife Sub. User Consumer	P. O. Box 1920			
Allison	Meyer	Sport Fishing	23 Payson Rd.	Falmouth	ME	04105
Garrett	McKee	Sport Fishing	2134 Dawnlight Ct.	Anchorage	AK	
Drew	Huck	Sport Fishing	4341 West Lake Circle			

Scott	Stanley	Sport Fishing	5611 John Muir Cir.	Anchorage	AK	
Susan	Stanley	Sport Fishing	1492 Brown Cir.	Boulder	CO	80305
Larry	Cobb	Kings Run Charters/Sport Charter	P. O. Box 39082	Ninilchik	AK	99639
Dean	Verburtg	Sport Shed Employee	P. O. Box 1933	Homer	AK	99603
Tom	Hagberg	Sport Commercial	P. O. Box 175	Anchor Point	AK	99556
Bill	Overway	Sport	59805 Winter Wren	Homer	AK	99603
Tabor	Ashment	Sport Fishing	3515 Homer Spit Rd. #A	Homer	AK	99603
Marissa	Wilson	Sport, Commercial	P. O. Box 703	Homer	AK	99603
Randal	Clifford	Sport Fishing	P. O. Box 1831	Homer	AK	99603
Thomas M.	Odenthal	Sport Fishing	3355 Bear Ridge Circle	Eagle River	AK	99577
Rosie	Burgess	A Rosy Outlook B&B & Sportfishing	P.O. Box 2605	Homer	AK	99603
Henry	Baldauf	Sport Fishing	P. O. Box 2524	Homer	AK	99603
David	Pleznal	Sport Fishing	41930 Charlie Dr.			
Jennifer	Bell	Sport Consumer	P. O. Box 3423	Seward	AK	99664
Casey	Slekaniec	F/V Harvest Moon/Commercial	Box 1275	Homer	AK	99603
Wes	Schacht	Omnitour AK/Seafood Consumer/Former Commercial Fish	P. O. Box 153243	Fritz Creek	AK	99603
Beverly	Griffeth	Former Charter Boat Owner/Crew, Seafood consumer	P. O. box 15304	Fritz Creek	AK	99603
Paul	Riedel	Subsistence Fisher/Hunter, Seafood buyer,	3101 Kachemak Dr.	Homer	AK	99603
Eileen	Mullen	Retired Comm Fisher/User of Fresh Fish	Box 1394	Homer	AK	99603
Gabrielle	Damro	Nomar	Box 1539	Homer	AK	99603
Jeremiah	Emmerson	Commercial Fisherman	P. O. Box 1539	Homer	AK	99603
Dan	Boone	Sport Fishing	1680 Lincoln Dr.	Homer	AK	99603
Dave	Seaman	Fishing	P. O. Box RDO	Homer	AK	99603
Nancy	Hillstrand	Fish Processor/Commercial Sport Personal Use	Box 7	Homer	AK	99603
Aimee	Solczynski	Sport/Consumer	P. O. Box 344	Homer	AK	99603
Kim	McNett	Subsistence user	P.O. Box 237	Homer	AK	99603
Christie	Gates	Subsistence/Seafood Consumer, Commercial Interest	P. O. Box 4304	Homer	AK	99603
Amanda	Miotke	Subsistence User/Seafood Consumer	4530 Jade Dr.	Homer	AK	99603
Mike	McCune	Yes (Consumer)	Box 2168	Homer	AK	99603
Dan	Miotke	Sport Fishing	4530 Jade Dr.	Homer	AK	99603
Steven	Shank	Sport Fisher/Local Resident	P. O. Box 2377	Homer	AK	99603
Kelvin	Smith	Local Resident/Consumer	P. O. Box 1813	Homer	AK	99603
Roch	Duz	Subsistence Sport	P. O. Box 2291	Homer	AK	99603
Michael	Bavarsky	Ecologist	P. O. Box 15115	Fritz Creek	AK	99603
Maddie	Bowen	Subsistence/sport/consumer/commercial	P. O. Box 1642	Homer	AK	99603
Paul	Hueper	Consumer	Box 301	Homer	AK	99603
Jinlay	Handy	Consumer	P. O. Box 1015	Homer	AK	99603
Joanna	Tornes	Commercial Consumer	4047 Main St.	Homer	AK	99603
Ty	Gates	Sport/Subsistence/commercial	P. O. Box 4304	Homer	AK	99603
Travis	Larson	Sport/Charter/Subsistence	P. O. Box 1978	Homer	AK	99603
Susan	Larson	Sport/Charter	P. O. Box 1978	Homer	AK	99603
John	Butzher	Sport fishing	P. O. Box 1556	Homer	AK	99603
Charles	Deal	Sport Fisherman	P. O. Box 2584	Homer	AK	99603
Gary	Lyon	Sport Fisherman	P. O. Box 2095	Homer	AK	99603
Michelle	Hatton	Consumer	54095 Wilderness Ln.	Homer	AK	99603
Jim	Brooks	Sport Fishing	Box 520463	Big Lake	AK	99645
Tony	Salazar	Sport Fishing	3311 Beamreach Ct.	Anchorage	AK	99516
John	Baker	Sport Charter	P. O. Box 39388	Ninilchik	AK	99639
Rich	Birch	Consumer	36995 True Fir C.	Soldotna	AK	99669
Mike	Patterson	Sport Charter	8052 Queen Victoria	Anchorage	AK	99518
Lilan	Smith	Sport Fishing	13349 Westwind Dr.	Anchorage	AK	99516
Mindy	Peterson	Sport Fishing	246 N. Tiffany	Palmer	AK	99645
Abe	Porter	Early Dawn, Commercial Salmon	P. o. box 1018	Kenai	AK	99611
Richard	Baltzer	Fish Homer Charters	P. O. Box 895	Homer	AK	99603
Dave	Cloud	"Trisha" Charter/Time Out Charters	Box 2756	Homer	AK	99603
Pat	Schneider	Seafood Business	P. O. Box 667	Homer	AK	99603
David	Bayes	Charter Boat	P. O. Box 3663	Homer	AK	99603
Charles	Meredith	Consumer	57590 Windsor Ct.	Homer	AK	99603

Robbi	Mixon	Consumer	57590 Windsor Ct.	Homer	AK	99603
Lee	Ellis	Subsistence/Consumer	P. O. Box 754	Girdwood	AK	99587
Kathryn	Carsow	Consumer/Subsistence	P. O. Box 3518	Homer	AK	99603
Jessie	Lewis	Vessel Atka Pride and Konrad 1	P. O. Box 2625	Homer	AK	99603
Richard	Olson	Seafood Consumer	64615 Star Ct.	Homer	AK	99603
Karla	Carpenter	Subsistence User/Sport Fisher/Consumer	3756 Terrace Drive	Anchorage	AK	99502
Dan	Carpenter	Subsistence User	3756 Terrace Drive	Anchorage	AK	99502
Billy	Hayden	Deckhand/Subsistence	Katchemak Dr.	Homer	AK	99603
Jim	Lunny	Consumer	326 Ocean Dr. Loop	Homer	AK	99603
Bruce	Hess	Sport Consumer	P. O. Box 1724	Homer	AK	99603
Polly	Hess	Environmentalist	P. O. Box 15115	Fritz Creek	AK	99603
John G.	Sibley	Commercial Fisherman Ret. Sport Fisherman	P. O. Box 3051	Homer	AK	99603
Art	Short	Fish buyer	P. O. Box 4294	Homer	AK	99603
Kate	Finn	Subsistence & Commercial Userq	P. O. Box 3364	Homer	AK	99603
Shirley	Forquer	Sport Consumer	P. O. Box 1187	Homer	AK	99603
Victoria	Noble	Seafood Consumer/Conscientious Human Being	P. O. Box 241462	Anchorage	AK	99524
Renee	Bond	Sport	Box 3130	Homer	AK	99603
Karen	Anderson	Sport Shed Employee	P. O. Box 1558	Homer	AK	99603
Mike	Barrett	Consumer	P. O. Box 364	Anchor Point	AK	99556
Jack	Berg	Sport Shed Employee	P. O. Box 1558	Homer	AK	99603
Randy	Scovey	Consumer	HcH7 Main			
Thorey	Munro	Commercial & Subsistence	P. O. Box 1971	Homer	AK	99603
Jordan	Dyer	Consumer Sport	P. O. Box 1260	Homer	AK	99603
Amber	Niehuber	Consumer & Sport	P. O. Box 3734	Homer	AK	99603
Matt	Smith	Consumer	5201 E Northern Lights Blvd. 7E	Anchorage	AK	99508
Kali	Guerrini	Consumer Sport	P. O. Box 3133	Homer	AK	99603
Branden	Bornemann	Sport	4150 N. Dogwood Rd.	Soldotna	AK	99669
Brian	Kaferstein	Sport	P. O. Box 94	Seward	AK	99664
Levi	Kohl	Sport	P. O. Box 421	Soldotna	AK	99669
John	Hohl	Sport	P. O. Box 421	Soldotna	AK	99669
Kristen	Cook	Consumer	P. O. Box 1021	Homer	AK	99603
Bradley	Klookl	Subsistence User	P. O. Box 2132	Homer	AK	99603
Jess	Dullinger	Subsistence User	3585 East End Rd. Unit 15	Homer	AK	99603
Angela	Langer	Consumer	P. O. Box 1561	Homer	AK	99603
Joe Ray	Skrha	F/V Katie B	2455 Watergate Way	Kenai	AK	99611
Dennis H.	Randa	Randa Fishing	P. O. Box 3055	Soldotna	AK	99669
Mark	Wackler	Fishology Alaska/Fishing Guide Svc/User	P. O. Box 4653	Soldotna	AK	99669
David	Atcheson	Sport Fisher	Box 145	Sterling	AK	99672
Kyle	Kolodziejski	Sportfish	P. O. Box 166	Moose Pass	AK	99631
Heidi B.	Jerrils	Sport	4424 Lucas St.	Grandville	MI	49418
Eve	Wiggins	Consumer	12510 Kallgren Rd.	Bainbridge Is.	WA	98110
Mike	Smith	Consumer	P. O. Box 577	Cooper Landing	AK	99572
Bobbie Jo	Kolodziejski	Consumer	P. O. Box 166	Moose Pass	AK	99631
Michelle	Holihan	Sport	P. O. Box 671	West Yellowstone	MT	59758
Joey	VanLeuven	Sport	P. O. Box 87	Imbler	OR	97841
Gabrielle	Markel	Sport	P. O. Box 917	Girdwood	AK	99587
Jamie	Copeland	Sport	P. O. Box 671	West Yellowstone	MT	59758
Anna	Carlson	Consumer	P. O. Box 232	Moose Pass	AK	99631
David	Story	Sport Fishing	16520 Sterling Hwy	Cooper Landing	AK	99572
Simmons	Adickes	Sport Fishing	16520 Sterling Hwy	Cooper Landing	AK	99572
Kimberly	Layton	Sport Fishing	2839 Sunflower St.	Anchorage	AK	99508
George E.	Macaluso	Sport Fishing	P. O. Box 72	Merrill	OR	97633
Jimmy	Burns	Consumer/SF/Interest	16918 Sterling Hwy	Cooper Landing	AK	99572
Emerald	Burrill	Consumer	P. O. Box 389	Girdwood	AK	99587
Allyson	Fitzgerald	Consumer	534 Prairie Lane	Mesquite	TX	75150
Justin	Ketzler	Consumer	MSC 1507 0615 Palatine Hill Rd.	Portland	OR	97219
Laredo	Rich	Environmentalist/Consumer	4960 Windermere Ln.	Victor	ID	83455
Janine	LeGaspi	Consumer	P. O. Box 762	Cooper Landing	AK	99572

Alexandra	Muckey	Consumer	4322 N. 18th Pl.	Phoenix	AZ	85016
Cody	Ashby	Sport Fishing	5083 G. Street	Springfield	OR	97478
Jennifer	Hubert	Consumer	1280 Riva Drive #4	West Sac	CA	95691
Max	Ley	Sport Fisher	Box 955	Needville	TX	77461
Jaime	Smith	Consumer	48941 Celeste	Chesterfield	MI	48051
Keith	Larson	Sportfishing	850 Morning Glory Lane	DePere	WI	54115
Gordon	Wetzel	Sport Fisher/Consumer	4235 Birch Run	Anchorage	AK	99507
Linda	Wetzel	Sport Fisher/Consumer	4235 Birch Run	Anchorage	AK	99507
Josh	Moore	Sport Consumer	1035 Race Rd.	Homer	AK	99603
Casi	Pearson	Sport Consumer	1035 Race Rd.	Homer	AK	99603
Julie	Gralow	Sport Consumer	1924 46th Ave.S. W.	Seattle	WA	98116
Hugh	Allen	Sport Consumer	1924 46th Ave.S. W.	Seattle	WA	98116
Toby	Wheeler	Subsistence User Salmon Consumer	P. O. Box 2289	Homer	AK	99603
Morgan	McBride	Sport,Subsistence User,Consumer	P. O. Box 956	Homer	AK	99603
Liz(Elizabeth)	Gordon	Bird Watcher, Consumer	6755 Delmonico Dr.#301	Colorado Springs	CO	80919
Gerald	Frederick	Subsistence/Seafood/Boat Carpenter/Ex Deckhand	P. O. Box 795	Homer	AK	99603
Matthew V.	Murphy	Sport Angler employed by SportfishingLodge/Chef	P. O. Box 1128	Girdwood	AK	99587
Amy	Rattenbury	Consumer Sport	P. O. Box 1377	Homer	AK	99603
Ruth	St. Germain	Consumer/Sport Subsistence User	1207 Channel Way	Kenai	AK	99611
Bob	Shavelson	Consumer/Pers. Use	P. O. Box 1498	Homer	AK	99603
Michael	Schallock	Sport	4453 Town Ht. lane	Homer	AK	99603
Mark	Nelson	Sport	P. O. Box 240994	Anchorage	AK	99524
Michael	Anderson	Sportfishing	Box 3404	Columbus	OH	43220
Michael	Flores	Charter Owner	37834 Woods Dr.	Soldotna	AK	99669
Brad	Cunningham	Sport/Subsistence	P. O. Box 39838	Anchorage	AK	99508
Kim	Wynnamaker	Sport	10855 Refuge Cir.	Kenai	AK	99611
Jay	Sjogren	Sport	6496 Bayview Edison Rd.	Kenai	AK	99611
William	Wheeler	Sportsfishing/Arctic Endeavor	1310 11th Street	Ninilchik	AK	99639
Travis	Palmer	Sport	295 Riverside Dr.	Anchorage	AK	99515
Mark	Voroblic	Sport, Commercial	1908 Meander Cir.	Bow	WA	98232
Jonathan	Knapp	Sport	12910 Admiralty Pl.	Anacortes	WA	98221
Todd	Towell	Sport/Commercial	12910 Admiralty Pl.	Soldotna	AK	99669
Jacob	Buchanon	Sport Fisherman	7241 Huffman Rd.	Anchorage	AK	99516
Shane	Patzke	Sport Fisherman	35000 Poppyridge	Anchorage	AK	99515
Tiffany	Patzke	Sport Fisherman	3257 Lake Park Circle	Anchorage	AK	99515
Jason	Fox	Sport/Subsistence/Consumer/Commercial	3257 Lake Park Circle	Anchorage	AK	99615
Tom	Corr	Salmon Chaser	6041 Mackay	Soldotna	AK	99669
Jake	Wedin	Consumer/Sport Fisherman	9718 St. Lawrence Cir.	Anchorage	AK	99517
John	Wedin	Sport Fish	1150 S. Colony Dr. St. 3-PMB 17	Anchorage	AK	99517
Bing	Pritchard	Fish	2096 Waldron Dr.	Anchorage	AK	99518
Steve	Novak	Sport	P. O. Box 87546	Anchorage	AK	99517
Mary Ellen	Osland	Sport Fishing	2442 Forest Park Dr	Palmer	AK	99645
Kathy	Hatten	Sport	1908 Meander Cir.	Anchorage	AK	99507
Robert	Rasmussen	Sport	1908 Meander Cir.	Wasilla	AK	99687
Richard	Tweet	Sport	P. O. Box670289	Anchorage	AK	99517
James	Buchanon	Sport	P. O. Box 1310	Anchorage	AK	99516
Ruby Dee	Buchanon	Sport	18808 Sarichef	Anchorage	AK	99516
Beverly M.	Kirk	Consumer	54329 Wilderness Ln.	Chugiak	AK	99567
Lynne	Steen	Consumer	P. O. Box 520263	Cordova	AK	99574
Bill	Price	Consumer	1331 Gram Cir.	Eagle River	AK	99577
Lori	Jenkins	Bycatch	501 Togjak Cir.	Homer	AK	99603
Mike	Knapp	Sport	1219 "U" St.	Big Lake	AK	99652
Robert	Wilson	Subsistence/Consumer/VesselSport	2131 W. 48th Ave.	Anchorage	AK	99518
Cuin	Steven	My Fish	7021 Joseph St.	Anchorage	AK	99503
Luke	Graham	Charter Operator	8023 Normanshire Cr.	Anchorage	AK	99501
Don	Swanson	Happy Jack	11320 Via Appia	Anchorage	AK	99517
Kevin	Mccoshum	Sport	500 Gerondale Cir	Anchorage	AK	99518
Clifton	Fox	Sport, Subsistence	3230 W. Grand Bay	Anchorage	AK	99504

Seth	Ransom	Sport, Consumer	13211 Venus Way	Anchorage	AK	99515
Chuck	Kahahawai	Sport, Subsistence	6201 Tyre Cir.	Wasilla	AK	99687
Leah	Henderson	Sport	P. O. Box 1706	Wasilla	AK	99687
Jeff	Deitz	Sport	7922 Ptarmigan Ct.	Anchorage	AK	99515
Billy	Reynolds	Sport Fishing	4300 E 6th Ave.	Anchorage	AK	99502
Jim	House	Sport Fishing	P. O. Box 879667	Homer	AK	99603
Jerry	Barth	Sport	5927 Goodwin Ave. Unit 13	Anchorage	AK	99504
John	Barth	Sport	1204 Norman St.	Anchorage	AK	99508
Demara	Crim	Sport	3250 Lake Park Cir.	Wasilla	AK	99687
Ben	Hay	Sport	806 W. 88th Ave.	JBER	AK	99506
C J	Lupien	Sportsmen	700 N. Somerset Cir.	Anchorage	AK	
Burke	Wick	Rocking H	7417 Old Harbor Ave.	Anchorage	AK	99519
Peter	Hardy	Halibut Guru	10254 Goodnews Cir.	Anchorage	AK	99515
Aaron	Steiner	Sport Fish	3449 Sagan Cir.	Wasilla	AK	99654
George	Charette	Sport	1831 S. Rue La Paix	Anchorage	AK	99504
James	Minsky	Sport	3220 E. 42st #1	Anchorage	AK	99515
Scott	Boe	Consumer	4068 Bullard Ave. Unit G.	Anchorage	AK	99517
Will	Lee	Sport	POB 671672	Wasilla	AK	99623
Travis	Beezley	Consumer	2190 Kachemak Dr.	Anchorage	AK	99504
Joshua	Mills	Sport	41860 Easte Lake Ave.	JBER	AK	99506
Dana Thorp	Patterson	Commercial	391 W. Rockwell	Chugiak	AK	99567
Dave	Rush	Sport	P. O. Box 143254	Homer	AK	99603
Harry	Temple	Fish Guide	P. O. Box 244606	Soldotna	AK	99669
Gonzalo	Araoz	Fisherman	8023 Bearberry #1	Soldotna	AK	99669
Ben	Barnes	Consumer	5250 DeArmoun Rd.	Anchorage	AK	99514
Jesse	Harris	Consumer	5966 Webb Court	Anchorage	AK	99524
Vern	Hurlber	Consumer	3009 Donington Dr.	Anchorage	AK	99502
Carole	Jorgensen	Consumer	748 Foxridge Way #E	Anchorage	AK	99516
Daniel	Hagerman	Sport Fisherman	811 Fairwood Cir.	JBER	AK	99506
Glenn	Teela	Sport	1845 N. Salem Dr.	Anchorage	AK	99504
Doug	Williams	Sport	P. O. Box 197	Anchorage	AK	99518
Kaldig	Dickinson	Sport	P. O. Box 3353	Anchorage	AK	99518
M.	Clark	Sport/Subsistence	10846 Delta Cir.	Anchorage	AK	99508
Tylor	Sutherland	Sport	13040 Sue's Way	Clam Gulch	AK	99568
Debra	Wedin	Sport Fishing Consumer	1419 Columbine St.	Homer	AK	99603
Chris	Launer	Sport Fishing	1419 Columbine St.	Eagle River	AK	99577
Don	Spencer	Sportfishing/Consumer	35410 Entrada Dr.	Anchorage	AK	99516
Al	Grillo	Fishermen	P. O. Box 3353	Anchorage	AK	99508
Yasmin	Grillo	Fishermen	P. O. Box 735	Anchorage	AK	99308
Randy T.	Berg	Subsistence	16316 Side Hill	Sterling	AK	99672
Gene	Mangiaridi	Sport Charter	4496 Reka Dr.	Homer	AK	99603
Dave	Goldstein	Sport Charter	2651 N. Larry Trail	Whittier	AK	99693
Diane	Hodge	Sport/Charter	5101 W. Clarion Ave.	Eagle River	AK	99577
Kaytlyn	Church	Subsistence	Box 158	Anchorage	AK	99508
Jimbo	Taliaferro	Sport	2304 McRae Apt. #6	Wasilla	AK	99623
Randy T.	Doucette	Sport	2304 McRae #4	Wasilla	AK	99623
Robert	Norbert	Commercial Fishing	1016 East 12th Apt. 2	Dillingham	AK	99576
Colby	Smith	Sport Fishing	2518 Kensington Dr.	Anchorage	AK	99517
Christina	Brewer		P. O. Box 1269	Anchorage	AK	99517
Stewart	Valladolid	Sport, Business	P. O. Box 1269	Anchorage	AK	99501
Dennis	Johnson	Sport, Business	P. O. Box 633	Anchorage	AK	99504
Terry	Spessard	Sport	20321 Raven	Girdwood	AK	99587
Tigo	Bogle	Sport		Girdwood	AK	99587
Jason	Simmons	Sport		Cooper Landing	AK	99572
Doug	Hanson	Consumer	17001 Belarde Ave.	Eagle River	AK	99577
Amanda	Burton	Sport	8120 Lakonia	Eagle River	AK	99577
Brian	Burton	Sport	246 N. Tiffany Dr.	Eagle River	AK	99577
Larry	Davis	Sport	P. O. Box 4177	Anchorage	AK	99516

Chris	Sharpe	Sport	2830 Gillam Cir.	Anchorage	AK	
Scott	Peterson	Sport	20840 Icefall Dr.	Palmer	AK	99645
Randy J.	Berg	Sport, Sport Charter	266 Redwood Ct.	Soldotna	AK	99669
David	Hubbard	Sport	P. O. Box 39115	Anchorage	AK	99577
Ben	Wedin	Consumer	P. O. Box 39115	Eagle River	AK	99577
Rod	Berg	Sport	P. O. Box 871134	Soldotna	AK	99669
Ron	Lambert	Sportfishing, B&B	1170 Denali St. #437	Ninilchik	AK	99639
Anita	Lambert	B&B	12850 Kayak Dr.	Ninilchik	AK	99639
Tibor	Molnar	Fishing	P. O. Box 1193	Wasilla	AK	99687
Doug	Gorgoni	"Molly B" Seward E-58	3108 N. W. 35 Ave.	Anchorage	AK	99501
Brad	Butler	Linda Marie	710 Harbor Circle	Anchorage	AK	99515
Bill	Scott	Lodging, Fish Processing	710 Harbor Circle	Anchor Point	AK	99556
Kurt	Homme	Sportfishing	22123 Brownie Dr.	Anchorage	AK	99517
Cary	Foster	Sportfishing	P. O. Box 2357	Anchorage	AK	99515
Casey	Stallings	Sportfishing		Anchorage	AK	99515
Bruce	Singley	Sportfishing		Eagle River	AK	99577
Tyland	Vanlier	AK Fishing & Lodging		Soldotna	AK	99669
Bruce	Lozekar	Sport Charter Captain	P.O. Box 3383	Homer	AK	99603
Jay	Lund	Commercial	1517 Mission Rd.	Kodiak	AK	99615
Julie	Miller	Commercial Fishing	614 Hillside	Kodiak	AK	99615
Terry	Haines	Commercial Fishing	724 Hillside	Kodiak	AK	99615
Zack	Vickstrom	Commercial Fishing	1813 Rezanof	Kodiak	AK	99615
Josh	Leach	Sport, Commercial, Charter	PO Box 43	Larsen Bay	AK	
Joseph	Musgrove	Sport, Subsistence	1327 Mylark	Kodiak	AK	99615
Guy	Shuravloff	Sport, Subsistence	PO Box 2282	Kodiak	AK	99615
Mike	Trussel	Subsistence	1298 Sawmill Circle	Kodiak	AK	99615
Dave	Kubiak	Sport, Charter, Subsistence	PO Box 193	Kodiak	AK	99615

**David Bayes, President
Alaska Charter Association
PO Box 478
Homer, Alaska 99603**

May 27, 2013

**Eric A. Olson, Chairman
Chris Oliver, Executive Director
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, Alaska 99501-2252**

Re: C-4 GOA Salmon Chinook Bycatch

The Alaska Charter Association (ACA) is a statewide organization representing over 150 charter and associated businesses. Our mission: "To preserve and protect those fishing rights and resources necessary for the Alaska charter fleet to best serve the recreational fishery."

The ACA strongly urges the council to take the action required to reduce Chinook bycatch to the lowest levels possible in the Gulf of Alaska.

In 100 years, this State and our Nation will look back at the plight of Alaska's once great fisheries and wonder how our society and regulators could have allowed such wastages as those seen in the present day trawl fisheries. As a group of educated and accomplished fishermen and regulators, please take the initiative to lead with a conservative tone and manage fisheries in a manner that rewards clean fishermen and penalizes the dirty.

There is no reason that sport, longline, and subsistence fishermen should be facing reduced catch limits and opportunity as a result of dirty fishing by the trawl fleets. With a re-authorization of Magnuson-Stevens looming in the near future, it is of the utmost importance that our present Councils show an eagerness and ability to prudently regulate our current fisheries. While setting Chinook bycatch numbers as low as possible may not be popular with the trawlers, it is absolutely an expected decision by the rest of us who rely on the Councils to protect our fisheries for generations to come.

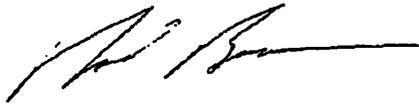
Sport fishermen, subsistence harvesters, Alaska residents and concerned consumers deserve improvements to our fisheries management system to reduce the waste of millions of pounds of valuable fishery resources as bycatch.

The Gulf non-pollock fisheries are the only fisheries remaining that catch significant amounts of salmon bycatch, yet have no limit.

Chinook salmon are critical to subsistence, sport and commercial fisheries, as well as a major contributor to the economy and culture of Alaska.

All other users have to reduce their harvest to conserve Chinook salmon in years of low returns. The trawl fisheries must do the same.

Thank you for consideration in this matter.



**David Bayes, President
Alaska Charter Assn.**

Groundfish Forum

4241 21st Avenue West, Suite 302
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206-213-5270 Fax 206-213-5272
www.groundfishforum.org

May 28, 2013

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

Re: Agenda C-4, GOA Chinook salmon bycatch

Dear Chairman Olson,

Groundfish Forum is comprised of 5 quota share (QS) holders representing 21 QS permits in the Amendment 80 (non-AFA trawl catcher-processor) sector. We are writing to comment on proposed action to institute a cap on Chinook salmon bycatch in Gulf of Alaska (GOA) non-pollock trawl fisheries. Several of our vessels operate in the GOA rockfish and flatfish fisheries, and have a long history of involvement and dependence in the Gulf.

Our members are working on several fronts to reduce bycatch. Our captains work together as much as possible to share information about Chinook bycatch. Our vessels have stopped fishing in some areas and moved when confronting bycatch. As you know, we have worked extensively to develop halibut excluder devices for use in other fisheries. However, to date we know of no effective gear modification to exclude salmon from non-pollock trawls. We will continue to work on both fishing behavior and gear design, and plan to do systematic work to develop a salmon excluder for flatfish and rockfish gear.

In addition to measures undertaken to minimize bycatch, our members understand the severity of bycatch concerns, and have already taken voluntary actions to improve bycatch data by increasing observer coverage beyond the mandatory 100% for our sector. Vessels will carry two observers (200% coverage) and will cooperate however possible with the Observer Program to obtain accurate counts of all salmon bycatch (by census if possible) and are already gathering tissue samples for genetic analysis. Further, members will work with SeaShare to donate bycaught salmon to needy Alaskan families; several vessels are already doing this.

Even with high observer coverage, accurate data collection, donation programs, information sharing and gear experimentation, we recognize that the Council may be compelled to select a limit for Chinook bycatch by non-pollock fisheries in the GOA. We offer the following comments on the analysis and options.

Obstacles to managing Chinook bycatch limits

The analysis shows that under any circumstances NMFS will have difficulty managing Chinook caps. Limited observer coverage, high variability in bycatch rates, imprecision resulting from extrapolation of limited samples, post-season changes in observer figures and relatively small bycatch caps all contribute to uncertainty and require NMFS to act conservatively. Even in sectors like Amendment 80 with high observer coverage, the uncertainty of actual and extrapolated numbers will force early closures. This is well explained in the document.

NMFS' management plan is not analyzed in the document

The document does NOT contemplate the effect of NMFS' stated management plan, which NMFS asserts will require closures well before any limit is reached:

For the GOA non-pollock trawl fisheries NMFS would consider PSC limits that are less than the historic highest weekly rate for the managed fishery to be too small to manage inseason. For the non-pollock trawl CV and CP sectors, these amounts are about 1500 Chinook salmon a week each for the Central GOA and 1000 Chinook salmon for the CPs and 100 Chinook salmon for the CVs for the Western GOA.¹

In other words, NMFS may feel compelled to close fishing for a given sector if the Chinook salmon limit is less than the numbers shown above – well before the limit itself was reached. NOWHERE does the analysis contemplate the effect of this way of managing the fisheries; all of the tables assume that fisheries would close if/when the limit for that sector/area is reached.² Because of this, all of the tables and conclusions drawn from them seriously underestimate the impact of any given limit, both to CPs and to CVs. There is no way that stakeholders – or Council members, for that matter – can fully understand the consequences of this action.

We understand how serious the issue is and the desire to take immediate action to address concerns. However, the omission of the above information so compromises the analysis that we encourage you to ask the authors to revise the document to incorporate NMFS' management plan. All of the impacts, from seasonal closures to foregone fishing, will be much different than are shown.

Preferred alternatives and options

Regardless of when you choose to take final action, we request that you select the following alternatives for the CP sector, in order of priority:

¹ EA/RIR/IRFA for Chinook Salmon Prohibited Species Catch in the Gulf of Alaska Non-Pollock Trawl Fisheries, May 15, 2013, page 223.

² See Table 4-75, page 194, for anticipated closure dates if NMFS closed fishing when the cap was reached. Nowhere do we find a similar table of closure dates assuming NMFS closes fishing when the limit is below the historic highest weekly rate, as they intend to.

- **Alternative 2, Option 2: Apportion the limit by operational type (CV vs CP)**
This is important for both CV and CP sectors. We operate in different fisheries, areas, seasons, and timing, and need to be able to apply whatever tools are available to minimize bycatch in our operations. Either sector could be shut down by the other without this provision.

- **Do NOT select Alternative 2, Option 1, for CPs (do not divide limit between Central and Western GOA)**
Our vessels fish both of these areas throughout the year. There is no advantage to separate limits by area, and the smaller boxes that would create will make it even more difficult for NMFS to manage the fisheries. Combining the limit across areas provides flexibility for both NMFS and the sector to minimize bycatch and maintain viable fishing operations.

- **Alternative 2, Option 2, suboption (a): Apportion the limit proportional to historic average bycatch of Chinook salmon (10-year average)**
All fisheries have different inherent bycatch levels, regardless of the sector or area involved. The Council has consistently recognized this when apportioning bycatch by basing those apportionments on historic use (Amendment 80, Rockfish Program). The Council used this rationale when it chose to apply different limits to pollock and non-pollock fisheries, and it applies equally well when apportioning any limit between catcher vessels and catcher processors, since these sectors rely on different non-pollock fisheries.

The analysis shows relatively high variability in bycatch rates over time. Using a 10-year average recognizes this high variability. A longer timeframe will help smooth out the disproportionate effects of unusually high or low bycatch years.

- **Alternative 2: 12,500 Chinook salmon PSC limit**
The higher limit allows the most flexibility to maintain some fishing opportunity while preventing excessively high bycatch. We know that any limit is going to be difficult or impossible for NMFS to manage in-season, and the Agency has indicated that it may be compelled to close fisheries well before the limit is approached. Bycatch numbers are highly variable, and extrapolation results in wide swings in the assumed catch that may be revised over time. Assuming all fisheries are included under this selection, the overall limit (25,000 for pollock and 12,500 for non-pollock) represents a 2,500 fish reduction from the present re-consultation figure of 40,000 fish. It is a fair assumption that the reduced limit will not be reached due to NMFS' conservative in-season actions.

Should the Council choose a number less than 12,500 fish, the effects of that choice would likely need to be mitigated through other measures, including exemptions for certain fisheries with low bycatch rates, seasonal limits, and other actions. These options would need to be structured to attempt to maintain very tight limits with some degree of protection to specific fisheries.

In summary, Groundfish Forum members understand the concern with Chinook salmon bycatch in our GOA fisheries and are taking proactive steps to improve bycatch performance. We share information about areas of high salmon bycatch and modify fishing behavior accordingly and continue to explore possible gear modifications. We are optimistic that these efforts will yield results in time, but we continue to face challenges. We know that it will be very difficult for NMFS to manage fisheries under some of the proposed bycatch limits, and that the analysis does not consider the actual (much more severe) impact from NMFS' stated plan to close fisheries well before the actual limit for a given sector or area is approached. We encourage you to select alternatives that recognize these challenges, as well as the unique nature of each fishery and sector, to address bycatch concerns while maintaining the opportunity for valuable groundfish fisheries.

Thank you for the opportunity to comment.



Lori Swanson
Executive Director

**Eric Olson, Chair
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501**

RE: Agenda Item C-4: GOA Salmon Chinook Bycatch

May 28, 2013

Dear Chairman Olson & Council Members:

Thank you for the opportunity to provide input on the Council's recommendation for addressing Chinook Bycatch in the non-Pollock trawl fisheries in the Gulf of Alaska.

My name is Stoian Iankov. My family owns and operates the f/v Michelle Renee. We deliver our fish to Kodiak, Sand Point and Akutan. I have been fishing in the Gulf of Alaska since 1984. We are involved in the following fisheries: Pollock, Pacific Cod, Rock Fish and Sole fish

As an affected stakeholder I request that you strongly consider my input into this important management decision. I'm already constrained in non-pollock Gulf of Alaska groundfish fisheries by the PSC limit on halibut. To further constrain my groundfish catch by incorporating another hard cap PSC Chinook salmon could result in a loss of economic dollars for me, my crew, my processor and my community.

Further restrictions in the absence of an innovative bycatch reduction program will result in less flexibility and increased inefficiencies thereby increasing costs without any direct benefit to Chinook salmon. This seems contrary to the requirements of the Magnuson Act. This approach could also lead to undesired behavior where individuals who aren't held personally accountable have less of an incentive to fish cleanly and seek innovative solutions to reducing bycatch - instead there is a race for fish to ensure your catch prior to the realization of a hard cap.

For all these reasons I believe the best approach to deal with PSC Chinook salmon is to focus resources on developing a bycatch management program in the Gulf that allows for the use of tools that don't penalize the fleet for the behaviors of one, but rather holds individuals accountable for their own behavior.

I believe the best way to deal with Chinook salmon bycatch, as well as any other bycatch for that matter, is to implement a comprehensive bycatch management plan in the Gulf. This provides the tools to help maximize value of catch and the incentives to decrease bycatch without being negatively affected by the behavior of the fleet.

No one knows the origin of Chinook in the Gulf non-pollock fisheries, but best evidence is that most are not from the Alaska runs doing poorly (i.e. Western Alaska, Cook Inlet) and in fact most are likely hatchery fish. Take in account natural mortality and the savings are negligible, but the costs to the trawl industry and processors could be huge.

The trawl harvesters are only one of the many dependent sectors reliant on these groundfish harvests. The Kodiak shorebased processors, the Kodiak service sector and community of Kodiak will all feel the economic pain if the quotas are not fully harvested and the harvesters can't modify their behavior as some speculate.

We are still trying to deal with the Chinook hard cap in the pollock fisheries starting last Fall and the reductions to our halibut PSC in the rockfish program. We also have to prepare for the upcoming cuts in our non-Rockfish Program halibut PSC allocations which also has great potential to affect trawl landings in Kodiak.

I support full retention of all salmon in all trawl fisheries. 100% retention of Chinook salmon will improve accounting, increase genetic sampling so that the best science will be available to determine the impact of trawl Chinook salmon bycatch on Chinook salmon runs.

Although gear innovations have continued over the years to reduce salmon bycatch using pelagic gear, there has been no research or innovations in gear designs to exclude salmon from bottom, non-pelagic nets. And research on salmon excluders in the GOA pollock fishery just started in April 2013.

In the current documents there is no evidence to suggest that the trawl sector has a negative effect on the salmon runs.

The only option you are left with is to choose Status Quo.

Sincerely,
Stoian Iankov
4531 NW Fremont St.
Camas, WA. 98607
907 942 7389



May 28, 2013

Eric Olson, Chair
North Pacific Fishery Management Council
605 W. Fourth Ave.
Anchorage, AK 99501

Re: Agenda Item C-4, Final Action on GOA Chinook Salmon Bycatch in Non-Pollock Trawl Fisheries

Dear Chairman Olson and Council members:

The Alaska Marine Conservation Council is dedicated to protecting the long-term health of Alaska's oceans and sustaining the working waterfronts of our coastal communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and families. Our ways of life, livelihoods and local economies depend on sustainable fishing practices and productive oceans. We provide these additional comments on the Council's action on GOA Chinook salmon bycatch in non-pollock trawl fisheries based on our review of the analysis to date and may submit additional comments in person at the Council's June meeting in Juneau.

We commend the Council's June 2011 action to set a long overdue limit on Chinook salmon bycatch in the GOA pollock fisheries. The GOA non-pollock fisheries is the last fishery under the Council's management which catches significant amounts of Chinook salmon as bycatch and is subject to no limit or other management measures. While these fisheries on average contribute a third of the known Chinook salmon bycatch in the GOA, and in some years as much as 70% of the bycatch, they remain at present unrestricted in terms of salmon bycatch. **It is time for the Council to close this gap in sustainable management and set a meaningful limit on Chinook salmon bycatch in the non-pollock fisheries at this meeting.** Given the disastrous state of Chinook salmon runs throughout the GOA it is imperative that the Council act quickly to meet its obligations under National Standard 9 and reduce bycatch in this fishery.

AMCC has advocated strongly for a 5,000 Chinook salmon limit for the GOA non-pollock trawl fishery. This limit, although the lowest under consideration by the Council, is barely below the long-term average bycatch in the fishery. We understand that if this cap is subdivided between areas, sectors and fisheries as in Alternative 2, options 1-4, a 5,000 cap may pose management challenges which could severely inhibit opening the trawl fishery. However, it is the Council's job to set limits which will adequately protect bycatch species such as Chinook salmon and which meet legal obligations, those of the Magnuson Stevens Act and Endangered Species Act in particular in this case. The Council's goal should not be to design management measures which fit within the fleet's current bycatch behavior, but to set standards for future behavior. In this context, AMCC urges the Council to act now to set a meaningful limit on bycatch in the non-pollock

C-2(c): GOA Chinook Bycatch Non-Pollock Trawl Fisheries

fisheries under Alternative 2. In addition, we encourage the Council to utilize every tool at its disposal to improve data collection in this fishery, including mandatory retention under Alternative 3, improved coverage levels under the restructured observer program and adjustments to sampling protocols to develop accurate estimates of stock composition utilizing genetic stock identification and coded wire tag recoveries.

I. The Current Status of GOA Chinook Salmon Stock's Necessitates Bycatch Reduction

In 2012, the state of salmon stocks around the GOA was quite literally a disaster. All monitored Chinook salmon runs were below average.¹ In Upper Cook Inlet, Chinook salmon runs were so poor that the Secretary of Commerce declared a fisheries disaster. The setnet fishery was almost completely shut down, and the Kenai River was closed to all recreational Chinook salmon fishing for part of the season. Despite these closures, only four out of twenty-one escapement goals were met in Upper Cook Inlet in 2012.² Economic losses in Cook Inlet to commercial fishing alone are estimated at almost \$10 million, with another \$17.7 million in direct and indirect spending lost to sport fisheries and additional losses to subsistence fishers.³ Seven GOA Chinook salmon stocks are currently listed as Stocks of Concern by the Alaska Board of Fisheries.⁴ Beyond the Gulf of Alaska, at least three Endangered Species Act-listed Chinook salmon are caught in the Gulf of Alaska trawl fisheries.

The forecast for 2013 is just as bleak, with a pre-season forecast for the early-run Kenai River Chinook salmon total run of 5,300 fish, which represents the low end of the optimum escapement goal (OEG) of 5,300 to 9,000 Chinook salmon.⁵ If this forecast is correct, this would be the lowest run measured in the last twenty-eight years. In response, sport fisheries on Kenai River have largely been restricted to catch and release for fish between 20 and 55 inches and bait prohibited July 1-14 on the Kenai between Skilak Lake and Skilok Creek markers as well as the Moose River upstream of the Sterling Highway bridge.⁶ While the Kenai might receive a lot of the news coverage, Chinook salmon runs throughout the Gulf of Alaska (as well as the Bering Sea) remain severely depressed. The State of Alaska recently allocated \$10 million towards Chinook salmon research, but currently we do not know what is causing the declines. While bycatch alone is not likely responsible for the declines, in this environment of Chinook salmon disasters every source of mortality must be reduced. Commercial, sport and subsistence fisheries are being restricted to provide for Chinook salmon escapements and the future of the resource, at great expense to many who depend on these fisheries. As a matter of both conservation and equity, mortality from the non-pollock trawl fisheries must be reduced as well.

¹ North Pacific Fishery Management Council, Initial Review Draft Environmental Assessment/Regulatory

² *Id.*

³ Susan Bell, Commissioner Alaska Department of Commerce, Community, and Economic Development, Letter to Senator Murkowski, Senator Begich, and Congressman Young, Nov. 8, 2012. Available at <http://www.scribd.com/doc/113181249/Susan-Bell-letter-to-congressional-delegation-on-salmon-disaster>.

⁴ EA/RIR/IRFA, *supra* note 1 at 43.

⁵ Alaska Department of Fish and Game, Emergency Order No. 2-KS-1-11-13, May 9, 2013. Available at <http://www.adfg.alaska.gov/static-sf/EONR/PDFs/2013/R2/2-KS-1-11-13.pdf>

⁶ *Id.*

C-2(c): GOA Chinook Bycatch Non-Pollock Trawl Fisheries

Lack of precision in bycatch estimates, as well as a lack of representative sampling for genetic stock identification work means that we do not have good estimates of the impact on any specific stock, including those listed under the Endangered Species Act. Therefore the analysis is not able to provide direct estimates of the number of any particular salmon stock which would be "saved" under any of the alternatives, but it is clear that any reduction in bycatch would be beneficial to the impacted Chinook salmon stocks.

According to the analysis: "If Chinook salmon PSC is reduced in some years as a result of this action, it would likely have beneficial impacts on Chinook salmon stocks, and the harvesters and consumers of Chinook salmon, compared to the status quo."⁷ In this particular case, the magnitude of the bycatch is important – fisheries around Cook Inlet were closed down completely because of the possibility that they may catch a few hundred Chinook salmon. The GOA trawl fisheries, on the other hand, are allowed to catch thousands. Placing a limit on non-pollock trawl fisheries now is critical both as a matter of conservation and equity in these times of Chinook salmon shortages.

II. Setting a bycatch limit: National Standard 9 requires a reduction in bycatch

AMCC has advocated for a bycatch limit of 5,000 Chinook salmon. This level of bycatch limit is barely below the 2003 to 2011 average bycatch for the GOA non-pollock fisheries of 6,001 Chinook salmon.⁸ The Council's mandate under National Standard 9 is to minimize bycatch to the extent practicable, not to maintain it at historic levels. The GOA non-pollock trawl fisheries have been operating without any requirement to minimize bycatch, and under the status quo there is no economic incentive to do so. A potentially constraining limit will provide the incentives necessary to prompt the development of methods to avoid Chinook salmon. The analysis highlights this effect:

Under a PSC limit, and especially if the attainment of the threshold appears to be imminent, the non-pollock trawl fleet may be active in making efforts to avoid high PSC rates, in order to preserve the opportunity to fully harvest the groundfish TAC's.... the adoption of a Chinook PSC limit likely will prompt efforts to gain better information concerning Chinook avoidance, improving the ability of participants to avoid Chinook in the long run.⁹

While the Council considers this action, it should keep in mind that a cap at or above the long-term average bycatch in the fishery does not comport with the mandate under National Standard 9. At a minimum, a meaningful limit should at the very least prevent the bycatch "spikes" experienced in the past from recurring.

We understand that the Council has begun the process of developing a catch share program for the GOA, and this may provide additional bycatch reduction "tools." However, past experience designing and implementing catch share programs tells us this process will be lengthy and complex, and is unlikely to provide anything resembling a quick fix to bycatch issues. Our Chinook salmon populations in the Gulf are in crisis

⁷ EA/RIR/IRFA, *supra* note 1 at 52.

⁸ *Id.* at 120.

⁹ *Id.* at 53.

now, and we cannot wait three years to begin to put limitations on bycatch. Additional bycatch reduction can and should appropriately be addressed through a catch share program, but it is imperative that the Council takes a first step now to put an upper bound on the allowable bycatch in the Gulf of Alaska non-pollock trawl fisheries. It is imperative that additional “tools” in a catch share program also comes with additional bycatch reduction if the Council adopts a cap at higher levels in recognition of the fleet’s inability to reduce bycatch under the current management program.

III. Reducing Bycatch Under National Standard 9 is Consistent with National Standard 1

National Standard 9 is to be applied consistent with the other National Standards. Some argue that reducing Chinook salmon bycatch will be inconsistent with achieving optimum yield (OY) under National Standard 1. This is simply not the case: OY is not determined solely by the amount the target fishery can provide, but the greatest overall benefits to the Nation, which includes other factor such as recreational opportunities and the protection of marine ecosystems. In fact OY represents the fishery’s MSY, “as reduced by any relevant economic, social, or ecological factor.”¹⁰ OY thus explicitly recognizes that optimum yield may not be the full amount determined by MSY, but may be reduced to provide for other needs. Therefore, reductions in target catch to meet the obligation of National Standard 9 does not mean that the Council is not achieving OY.

IV. Monitoring and Enforcement Concerns

The Draft EA/RIR/IRFA raises some compelling and disturbing concerns related to monitoring and enforcement.¹¹ According to this analysis, in the catcher vessel sector, deck sorting is common practice in this fishery and on unobserved boats “there is a high likelihood that salmon PSC has been sorted from the catch prior to delivery.”¹² Furthermore, under a PSC limit, this action is “highly susceptible to introduction of intentional bias into salmon PSC estimation,”¹³ meaning that under a PSC limit it is highly likely that fishermen would discard Chinook salmon at sea rather than have them be counted, and potentially trigger a cap. This supposition raises substantial concerns about current bycatch estimation, discussed further below. In the context of this action, however, the Council should not allow concerns over the current observer coverage to obfuscate the need or ability to take action now. The Council’s obligation is to identify and recommend necessary management measures. **Monitoring and enforcement needs, including observer coverage must be adapted to meet the needs of the management regime.** In this case, a lack of observer coverage is no reason to delay action, but rather identifies a need to design monitoring programs which will meet the management requirements of our fisheries. In the Bering Sea pollock fishery, observer coverage for all catcher vessels was increased to 100% to meet these concerns with the implementation of Amendment 91. If similar concerns exist in the Gulf of Alaska, the solution would seem to be the same.

¹⁰ 50 CFR 600.310(e)(3)(i)(A)(2012).

¹¹ See EA/RIR/IRFA, *supra* note 1 at 210-232.

¹² *Id.* at 213.

¹³ *Id.* at xxviii.

The concerns raised in the management enforcement considerations¹⁴ also create substantial doubt as to the actual degree of impact the status quo fisheries have on salmon. If the monitoring concerns are accurate, then the numbers presented throughout this document as the salmon bycatch numbers are likely inaccurate. In fact, if a great deal of at-sea discards are occurring in the fishery, the actual impact on Chinook salmon is likely greatly understated throughout the draft analysis. Similarly, these monitoring concerns call into question the information on which the Biological Opinion for ESA-listed Chinook salmon caught in these fisheries is based. If in fact a high degree of catch is discarded at sea, estimates of the incidental take of ESA-listed stocks are likely biased low as well.

While estimates of Chinook salmon impacts are likely *underestimated* throughout the analysis due to the monitoring concerns addressed above, economic impacts to the non-pollock trawl fisheries are likely *overestimated* throughout the document. The analysis of foregone revenue assumes no change in fishing behavior: "...regulatory impacts must be viewed with the caveat that fishers did not alter their behavior to avoid Chinook salmon and forestall PSC-related fishery closures."¹⁵ In addition, and perhaps more importantly, the analysis of foregone pollock, because it looks retrospectively, simply assigns the foregone pollock and revenue from the projected season closure date on. In reality with a PSC limit in place, harvesters will likely alter their fishing behavior to shift away from target fisheries with high levels of PSC to ensure that higher value, lower PSC fisheries can occur. While these mitigating circumstances are discussed qualitatively in the analysis, the quantitative tables of impacts do not reflect these probable adaptations and are therefore likely much higher than actual impacts.

V. Conclusion

In closing, Chinook salmon are a vital and essential component of our communities, our cultures and our economies in the Gulf of Alaska. For reasons of conservation and equity it is critical that bycatch of this critical species is reduced in a meaningful way. **We urge the Council to act now and select a meaningful bycatch limit under Alternative 2 for the GOA non-pollock trawl fleet as a starting point for bycatch reduction.**

Thank you for your continued attention to this important issue.

Sincerely,



Kelly Harrell
Executive Director
Alaska Marine Conservation Council

¹⁴ EA/RIR/IRFA, *supra* note 1 at 210-232.

¹⁵ *Id.* at 170.

F/V Gold Rush Fisheries LLC

*PO Box 425
Kodiak, Alaska*

Eric Olson, Chairman
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501

RE: Agenda Item C-4: GOA Chinook Salmon Bycatch

May 29, 2013

Dear Chairman Olson & Council Members:

Thank you for the opportunity to provide input to the Council addressing Chinook Salmon Bycatch in the non-Pollock trawl fisheries in the Gulf of Alaska.

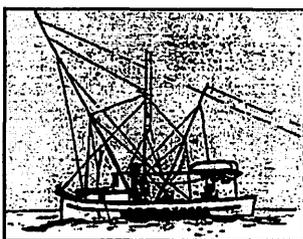
F/V Gold Rush is an AFA Exempt, Kodiak based trawler fishing for Pollock, Cod, Rockfish and Sole in the Gulf of Alaska as well as Pollock and Cod in the Bering Sea.

We are very concerned that the imposition of an arbitrary hard cap on Chinook Salmon PSC in non-Pollock Gulf groundfish fisheries, will very likely cause economic harm to the trawl fleet, the processors and the communities they are part of, without achieving the desired stock improvements for Chinook Salmon. We believe language in the analysis provides a great deal of support for this concern.

We do ask the Council to choose the status quo at the June meeting, while focusing efforts on the development of a comprehensive management plan for the Gulf, which encompasses a bycatch management regime that provides a better balance to the achievement of MSA National Standards.

Respectfully,

Don Ashley, F/V Gold Rush Fisheries LLC



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400 phone
(907) 58604473 fax
ata@gci.net

May 28, 2013

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

**RE: Agenda Item C4 - Final Action GOA Chinook Salmon Bycatch
Agenda Item C5 - GOA Trawl Bycatch Management**

Dear Chairman Olson and Members of the Council:

I am writing on behalf of the Alaska Trollers Association (ATA) regarding Chinook PSC limits and management of non-pollock trawl fisheries operating in the Gulf of Alaska (GOA). Controlling salmon bycatch in the trawl fisheries is particularly important given ongoing sacrifices being made by salmon fishermen from California to Alaska. To that end, **ATA supports instituting a hard cap for Chinook salmon taken in the non-pollock GOA trawl fisheries.**

ATA represents the interests of hook and line fishermen in Southeast Alaska who target Chinook, coho, and chum salmon. Much of the fleet also relies on halibut from areas 2C and 3A. The troll fleet is one of the largest in the state and is 85% resident; trollers make up the majority of permit holders in nearly all Southeast Alaska communities. Roughly one of every 35 people in Southeast works on the back deck of a troll boat. Trollers are highly reliant on Chinook salmon. Annual exvessel value of troll caught Chinook has exceeded \$32 million and 10% of the entire statewide salmon value. Alaska's general fund and communities receive between \$800K - \$1 million in fisheries business tax revenue from the troll industry each year. Chinook salmon usually comprise about half of the fleet's annual earnings.

From 2009 to 2010 Chinook bycatch in the GOA trawl fishery increased over 500% and our members expressed concern. In response, ATA called on the Council to expedite the implementation of hard caps and other measures to control trawl bycatch. Guiding our comments were the twin goals of controlling bycatch and providing reasonable fishing opportunity for GOA trawlers. The current cap on the GOA pollock fishery was a good first step and should help trawlers avoid the spikes in bycatch that have long concerned salmon

fishermen who target Chinook. It is appropriate to now develop a similar measure for the non-pollock trawl fisheries.

As the current data reveals, many of the tagged Chinook picked up in the trawl fishery come from a variety of jurisdictions that are governed by the Pacific Salmon Treaty (Treaty). Of the Alaska stocks, 75% appear to come from river systems in Southeast.

Since the mid-70s, Southeast Alaska fishermen have endured significant conservation restrictions to rebuild Chinook salmon from Alaska, British Columbia, and the Lower 48. The Treaty Chinook quota in Alaska still remains extremely low, contrary to promises made to trollers that the treaty rebuilding program, combined with a fishermen's financed hatchery program, would restore harvest to more than 500,000 fish by year 2000. This has not happened.

In 2010, when the Council first began the GOA trawl bycatch discussion in earnest, the Southeast Chinook quota was the 7th lowest since Treaty signing (1985) and more than 40K fish less than the original Treaty *rebuilding* quota of 263K. The 2013 season started on a grim note. For the third year, there will be no directed harvest of Chinook salmon from the Transboundary Rivers (Stikine and Taku). This will harm fishermen from Southeast Alaska and British Columbia. In addition, the 2013 all-gear Chinook quota for Southeast is just 176,000 fish –a decrease of nearly 91,000 from 2012, and the 4th lowest Treaty quota ever.

The impact of chronic low quotas in our region has been economic disruption of the troll fishery and unnecessary tension and allocation disputes amongst fishermen. This has been exacerbated by deep reductions in 2C halibut quotas.

Chinook in several other GOA areas are also struggling. For several years, directed salmon fisheries have seen dismal landings and early closures, causing ADFG to identify the Karluk River Chinook as a stock of concern. These stocks are likely to pass through GOA trawl fisheries at various stages of their lifecycle. Closure of the set net fisheries in Cook Inlet last year made big headlines and high stress during the Board of Fisheries and recent legislative session. The AYK fisheries have seen dramatic closures, though to what extent GOA trawlers harvest those stocks is not yet clear. The state and ADFG are putting significant resources into identifying the cause of these problems, along with possible solutions.

The genetic stock identification studies that are underway should help to provide essential data on Chinook salmon stock composition and run timing in the GOA, which will help to better define the impacts of trawl bycatch on various stocks and salmon fisheries. It should also help improve trawl management, by providing the information necessary to craft practical options to help trawlers avoid Chinook salmon. At this point, these data sets are rather thin and there is much yet to learn.

Troll representatives understand West Coast Chinook salmon better than most. We are used to looking at data runs similar to those presented in the Environmental Assessment (EA). Unfortunately, our limited knowledge of how the trawl fishery is conducted across the range of vessel types, areas, and seasons - coupled with a wide array of information and

options presented in the EA - make it difficult to endorse a specific cap. A Preliminary Preferred Alternative, with more specific and/or streamlined analyses would have been helpful. For now, **ATA supports a hard cap and trusts that the Council will work with the interests at the June meeting to determine the appropriate level.**

Why is full retention for unobserved vessels being considered 'Alternative 3', as opposed to a requirement within alternatives? **ATA supports full retention of salmon bycatch for unobserved vessels, regardless which alternative is ultimately adopted.** Hopefully NMFS would find some way to make use of this biological data, even if the issues raised in the EA necessitate the ongoing use of current methodology to estimate bycatch rates.

Finally, how will any of the proposed alternatives articulate with the GOA Trawl Bycatch Management Program that the Council is developing? Hopefully the hard cap option selected will provide a starting point for the new management plan.

ATA has long endorsed cooperative efforts between agencies and fishermen to develop and refine conservation based fishing strategies. Developing an appropriate hard cap and following up with other PSC management measures, through the GOA Trawl Bycatch Management Program, will provide assurance to salmon fishermen that Chinook bycatch will be dealt with in a meaningful way. That assurance should come through reasonable incentives and accountability standards, versus regulations that are too lax, or draconian restrictions that don't solve problems. This type of approach should establish strong sideboards and bycatch controls, while also providing incentives and flexibility for the trawl fleet to find creative solutions to avoid salmon and other prohibited species.

ATA believes that a long-term plan to reduce salmon bycatch can, and must, be developed. In the interim, we ask that a hard cap be promulgated for non-pollock GOA trawl vessels as soon as practicable, as was done in the pollock fishery.

Additionally, relevant research and analyses should continue, and be refined where necessary, to help answer the many outstanding questions about the nature and composition of GOA trawl bycatch and how to control and reduce it.

Thank you for your participation in the Council process. ATA appreciates your dedication and service to the nation's fisheries resources and fish dependent communities. If we can provide additional information, or otherwise be of assistance on this or other issues, please feel free to contact me.

Best regards,



Executive Director

Subject: CHINOOK SALMON PSC IN GOA NON-POLLOCK TRAWL FISHERIES (C-4)
From: Darius Kasprzak <kas_dar@yahoo.com>
Date: 5/28/2013 3:52 PM
To: npfmc.comments@noaa.gov

For the Record: Testimony of Darius Kasprzak

Chairman Olsen, Council Members, and Secretary,

I ask that you set a hard bycatch cap of 5000- 6000 chinook for the GOA non- pollock trawl fisheries. As the trawl fleet is only partially observed, this hard cap number may not accurately reflect the actual chinook take, which could be much higher.

I make this testimony with the experience of having worked on 8 GOA non- pelagic trawlers over the past 23 years. I have personally discarded at sea tons of trawl caught PSC, including chinook.

I now own and operate a commercial jigging operation. Over the past 7 years, I have harvested hundreds of thousands of pounds of cod and rockfish without a single chinook incidence or take. The disparity between different gear types could hardly be more stark. Also for the past 30 years I have worked many seasons on multiple highliner salmon seiners and gillnet sites in the Kodiak area. Even on seasons aggressively targeting the Ayakulik and Karluk chinook terminus river systems, I have never seen directed salmon gear chinook takes anywhere close to the worst observed GOA trawl PSC chinook takes as evidenced by publicly accessible NOAA PSC data for 2013.

The times they are a changing. Nowadays I see trawl crew members whipping out the same smartphones that they may be discouraged from using on deck (for fear of inconvenient PSC photo takes) and googling "Tholepin" blog, to see where their vessel of employment stands on the "Dirtiest Dragger" lists gleaned from this same publicly accessible NOAA data.

Chinook salmon biomasses and river returns are declining precipitously throughout Alaska. While the GOA trawl industry is indeed a important economic driver, unfortunately their current ease and level of profitability in targeting low value groundfish and flatfish must necessarily be curtailed to some extent through implementing a low hard cap for chinook PSC.

This level of protection needs to be afforded for the commercial, subsistence, and sport fisheries that depend upon the sustainability of this high value species.

Sincerely,

Darius Kasprzak
kas_dar@yahoo.com



Cordova District Fishermen United
PO Box 939 | 509 First Street | Cordova, AK 99574
phone. (907) 424 3447 | fax. (907) 424 3430
web. www.cdfu.org | email. cdfu@ak.net

May 27, 2013

North Pacific Fisheries Management Council
Eric Olsen, Chairman
605 W. 4th Ave, Suite 306
Anchorage, AK 99501-2252
Npfmtc.comments@noaa.gov

RE: Item C-4 GOA Salmon Chinook Bycatch

Chairman Olsen and Council members,

I am writing to you on behalf of the Cordova District Fishermen United's Board of Directors to express our appreciation of the Councils' intent to establish Chinook PSC limit in the GOA non-Pollock trawl fishery and support implementation of the lower bycatch limit of 5000 Chinook.

As one of Alaska's oldest fishing organizations, CDFU represents the interests of over 500 fishermen and their families in Prince William Sound. We have a long tradition of constructive and successful involvement in fisheries policy arenas supporting sustainable fishing practices, fisheries research, and the economic stability of Alaska's coastal communities.

Our commercial fleet has experienced loss of harvest opportunity to protect Chinook salmon stocks through area restrictions since 2008 when the Alaska Board of Fisheries implemented mandatory fishery closures of the inside waters in the Cooper River district. Because Chinook salmon are an essential component of our local economy, it's important to us that the GOA non-Pollock trawl fleet does its part to reduce impacts to Chinook salmon stocks and the burden of sacrifice to restore Alaska Chinook salmon runs is shared by all fisheries.

As fishermen that depend on sustainable ocean resources, we care deeply about the health and vitality of Alaska salmon. While Chinook salmon bycatch in the non-Pollock trawl fishery is not the sole cause of Chinook population declines in Alaska's river systems, it is absolutely critical that efforts are made, where possible, to reduce harvest mortality of Chinook salmon.

Thank you for your consideration of our comments.

Sincerely,

Alexis Cooper, Executive Director
Cordova District Fishermen United

May 28, 2013

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 W. Fourth Avenue, Suite 306
Anchorage, AK 99501-2252

Dr. James Balsiger, Regional Administrator
NOAA Fisheries, Alaska Region
709 West Ninth Street
Juneau, AK 99802-1668

RE: Gulf of Alaska Chinook Salmon Bycatch

Dear Chairman Olson, Dr. Balsiger, and Council Members:

Oceana commends the National Marine Fisheries Service (NMFS) and North Pacific Fishery Management Council (NPFMC) for their commitment to reduce Chinook salmon bycatch in the Gulf of Alaska groundfish fisheries. The decision to cap Chinook salmon bycatch in the pollock fishery was an important first step; and you have legal, social, and scientific responsibilities to now limit the uncontrolled salmon bycatch in the Gulf of Alaska bottom trawl fisheries. We urge you to take final action to implement a prohibited species cap (PSC) of 5,000 Chinook salmon for the Gulf of Alaska bottom trawl fleet.

Though regulations require that the Gulf of Alaska bottom trawl fleet minimize their catch of prohibited species, including Chinook salmon, there is little incentive for the bottom trawl fleet to do so. Currently, the bottom trawl fleet can continue to trawl no matter how many salmon the fleet kills. Indeed, the worst rates for Chinook salmon bycatch this spring belonged to several Gulf of Alaska bottom trawlers targeting arrowtooth flounder and shallow water flatfish.¹

Disconcertingly, the true extent of the salmon bycatch in these bottom-trawl fisheries is not known exactly. Estimates are based on an imperfect system of voluntary logbook reporting, catch deliveries, and limited observers. Further, observer coverage has decreased in 2013 in several Gulf of Alaska bottom trawl fisheries as a result of the restructured observer program.² Clearly, the trawl fisheries need to be better observed, not less observed, and we urge the Council to address this issue during a review of the restructured observer program. In the meantime, the NPFMC needs to take action to set a low Chinook salmon bycatch cap as a precautionary measure and assume that the bycatch estimates are minimum estimates that may have already been biased downwards.

Endangered Chinook salmon from the Lower Columbia River, Upper Columbia River, and Upper Willamette River are killed as bycatch by the Gulf of Alaska groundfish fishery. Additionally, research surveys have documented endangered Puget Sound Chinook, Snake River Spring/Summer Chinook and the Snake River Basin steelhead in the Gulf of Alaska trawling grounds. NMFS, as required by the Endangered Species Act, reinitiated Section 7 consultation in November 2010 to analyze the impacts of the Gulf of Alaska groundfish fisheries on endangered salmon. During such consultation, NMFS concluded that Chinook salmon bycatch of less than 40,000 fish annually in the Gulf of Alaska would not jeopardize the continued existence of the ESA-listed Chinook stocks. However, it is important to consider the cumulative impacts of the bottom-trawl and the pollock fleet's Chinook bycatch, and the uncertainty surrounding the estimates of bycatch. The Gulf of Alaska pollock fleet cap of 25,000 Chinook is already 62.5% of the ESA consultation trigger. Among the alternatives the Council is now

¹ <http://alaskafisheries.noaa.gov/2013/pscinfo.htm> accessed May 23, 2008

² NOAA Fisheries. January 2013. 2013 Annual Deployment Plan for Observers in the Groundfish and Halibut Fisheries off Alaska

Mr. Olson
Dr. Balsiger
May 28, 2013
Page 2

considering are caps for the bottom-trawl fleet of up to 12,500 Chinook, which, in total, would sum to an annually permitted bycatch of 37,500 Chinook salmon for the GOA groundfish fleet and almost 94% of the ESA-consultation trigger. We should not be managing salmon on the knife-edge of Endangered Species Act thresholds, which may not provide benefits for Alaskan Chinook stocks of concern, or commercial, sport, and subsistence salmon fisheries. The Council must reject consideration of such high salmon bycatch as a management tool and select a precautionary cap of 5,000 Chinook for the GOA bottom-trawl fleet.

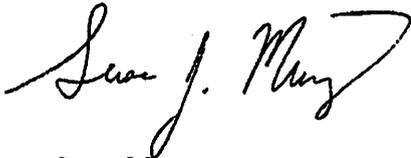
Reducing Chinook bycatch will have beneficial impacts on Chinook salmon stocks. While the EA/RIR/IRFA suggests there is not enough information to determine the effects of the bottom trawl fisheries on individual salmon stocks, it does indicate that the lower the bycatch cap, the greater the conservation benefit to salmon. Conservation easements for Chinook salmon are desperately needed. Chinook harvests and Chinook abundance have been on a declining trend for over 50 years in Alaska and on the entire Pacific coast. In 2012, all monitored Chinook salmon runs in the Gulf of Alaska suffered below-average returns. Chinook salmon populations are in trouble, and scientists have not pinpointed a cause. We are at a crucial juncture that counsels strongly in favor of conservative action by the Council as it sets the amount of Chinook salmon allowed to be taken by bottom trawlers.

The Chinook bycatch cap for the bottom-trawl fisheries should start at 5,000 fish and be reviewed annually to determine how much it can be further reduced dependent upon whether escapement goals were met, whether subsistence and commercial salmon needs were satisfied, what is shown by updated information on the stock-of-origin of the bycatch, and whether new insights in ocean research are incorporated. Our goal should be to reduce salmon bycatch on a trajectory toward zero with innovations in fishing gear and fishing techniques, research on salmon behavior and habitat, and improvements in management.

Finally, we reiterate our support for comprehensive management of salmon and research, including identification of the stock-of-origin and age of every salmon caught as bycatch. The Council does have tools to generate funds for research. For example, funding can be generated through the Council's authority pursuant to MSA §313(g) to levy fines up to \$25,000 on a vessel as an incentive to reduce bycatch and to make these funds available to offset costs including conservation and management measures and research. NMFS could also explore additional cost-recovery options through fees levied on the bottom trawl fleet. Additionally, proceeds generated by allocations of fish associated with exempted or experimental fishing permits should be used as a source of funding.

Thank you again for your commitment to this issue. By reducing and minimizing wasteful bycatch, more salmon will survive to spawn in the rivers and streams of Alaska, the Pacific Northwest, and Canada. We will continue to work with you and support your efforts.

Sincerely,



Susan Murray
Deputy Vice President, Pacific
Oceana

Eric Olson, Chair
North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
Anchorage, AK 99501

RE: Agenda Item C-4: GOA Chinook Salmon Bycatch

May 28, 2013

Dear Chairman Olson & Council Members:

Thank you for the opportunity to provide input on the Council's recommendation for addressing Chinook Bycatch in the non-pollock trawl fisheries in the Gulf of Alaska.

This is undoubtedly a very sensitive topic for Council members and industry alike. Unfortunately, there is considerable uncertainty surrounding the direct benefits to Chinook salmon stocks from any additional actions and emotion seems to be clouding the issues at hand.

The range of alternatives included in the EA/RIR is broad and the effects on individuals and associated businesses vary by harvesting operation and strategy. The number of permutations based on the alternatives and suboptions is vast and it is almost impossible for an individual to determine the effects on their operations. Further, the analysis as presented demonstrates that there are potentially significant adverse economic effects in aggregate on the harvesters of non-pollock groundfish with no quantifiable direct benefit to Chinook salmon stocks. The economic effects on harvesters are also negative for seafood processors as well as communities who depend on non-pollock groundfish fisheries as part of their overall portfolio of fisheries. For all of these reasons we recommend that the Council consider having a thoughtful discussion about the goals of this action as it relates to overall PSC Chinook salmon management in the Gulf prior to taking final action at this meeting. If the Council is still determined to take final action then we recommend the most liberal alternative (status quo) for reasons described below.

Tools for Accountability

Addressing Chinook salmon bycatch in the Gulf of Alaska groundfish fisheries has long been a topic of concern. This Council has previously acknowledged that tools to improve individual accountability and remove the race for fish are key to minimizing unwanted bycatch. This Council and others around the country have programs that employ these tools and there are clear examples of bycatch controls and reductions under this type of management. These same tools allow managers to better balance the competing national standards outlined in the Magnuson-Stevens Act. The Council is currently embarking on a process to identify alternatives to implement these types of tools in the Gulf of Alaska. Until this process is complete, however, the Council is left with only blunt instruments to address the problem –

resulting in potentially severe economic impacts for harvesters, seafood processors and communities with no defined and directly-linked benefit to Chinook salmon stocks. We want to take this opportunity to encourage the Council to continue to move forward on an expedited timeline with a bycatch tools management plan for the Gulf of Alaska that will address bycatch concerns for Chinook salmon at the same time as it provides the participants flexibility to prosecute their fishing strategies in ways that make sense and bring the most value to the stakeholders including the communities. As noted on page 4 of the EA/RIR, "Throughout the discussions of PSC avoidance in GOA fisheries, the Council has acknowledged that a more comprehensive consideration of management measures that would help fleets in achieving PSC reductions is needed."

Is a Hard-cap Necessary Now?

While the Council has signaled their obvious desire to implement measures to disincentivize Chinook salmon bycatch in the non-pollock trawl fisheries, the clear path forward is not so obvious. We strongly disagree with the notion that an arbitrary hard cap on salmon bycatch in the non-pollock groundfish fisheries is the only path forward and that immediate action to implement said cap is necessary. In fact, as is indicated throughout the document there is no hard and fast connection between the incidental take of Chinook salmon in these groundfish fisheries and the abundance of Chinook salmon available in Alaskan rivers.

To further complicate matters, the alternatives encompass dozens of possible outcomes and stakeholders are having a difficult time determining how the alternatives will affect them and their businesses. Unfortunately, it is not clear that additional analysis will assist in further identifying impacts of the alternatives to stakeholders. In fact, the types of information necessary to provide an adequate analysis will likely not be available in a useable form for several more years.

Of course, another course of action available to the Council would be to put the emphasis on developing a sophisticated GOA trawl management program and focusing on bycatch control and reduction mechanisms through that process as described above, rather than spending additional resources now on a management structure that in all likelihood will eventually be subsumed by a more appropriate and efficient bycatch management structure.

NOAA has already indicated that upwards of 40,000 Chinook salmon could be caught on an annual basis in the groundfish fisheries in the Gulf of Alaska without jeopardizing the continued existence of ESA-listed Chinook salmon stocks. With a hard-cap of 25,000 fish in place already for the pollock fishery, it seems very unlikely that all of the groundfish fisheries would surpass the 40,000 fish level triggering a reinitiation of the biological opinion for ESA-listed Chinook salmon stocks. In terms of Alaskan stocks, the EA/RIR describes the effects of the alternatives on Chinook salmon beginning on page 49. There are no significant adverse impacts on Chinook salmon abundance or sustainability described resulting from their incidental catch in the groundfish fisheries. The analysis further indicates

"The EIS also considered impacts of the fisheries on the genetic structure of the population, reproductive success, and habitat, and concluded that it is unlikely that groundfish fishing has indirect impacts on these aspects of Chinook salmon sustainability." The analysis also reports on page 50 "it is not possible to draw any correlation between patterns of PSC and the status of salmon stocks, especially given the uncertainty associated with estimates of PSC in the groundfish fisheries, and the lack of data on river of origin of Chinook salmon PSC."

For all of these reasons we question if this is the right course of action now. Almost certain economic harm to harvesters, processors and communities will ensue with the implementation of a restrictive hard cap – but without the corresponding benefit to salmon stock abundance.

Final Action

If the Council chooses to take final action at the June meeting then we recommend the most liberal approach. Status quo is the preferred option with the existing biological opinion for ESA-listed salmon, the complete lack of evidence that a hard cap on Chinook bycatch will benefit Alaskan salmon stock abundances, the pollock fishery hard cap, and the ongoing bycatch tools management process all combined as a safety net and justification for retaining existing measures. There is no direct link articulated in the analysis that shows a reduction in salmon catch in non-pollock trawl fisheries will result in stock improvements for Chinook salmon. To the contrary, as indicated above, there are several statements that state that this cannot be known and that all information indicates there is probably not a direct link.

What the analysis does show is that every ton of groundfish left in the water due to a premature closure of the fishery (i.e. prior to attainment of TAC) results in economic loss to the participants. Table ES-7 determines that had a gulf-wide Chinook salmon limit of 5,000 fish been in place between 2003 and 2011 there would have been six years with an early closure to the non-pollock groundfish fishery resulting in a loss of anywhere from \$14 million to \$62 million in revenue for a savings of 1,050 and 3,350 Chinook salmon respectively. These projections are likely underestimates as NMFS has made it clear the necessity to likely close fisheries prematurely to avoid overages of PSC. What the document does not say is how the saving of those few thousand Chinook will benefit the Chinook abundance – the document cannot articulate this because the link does not exist. The wholesale revenue can be multiplied further to demonstrate the negative economic effects on the secondary and tertiary businesses that support harvesting and seafood processing. In the end, this action hurts people, businesses and communities but does nothing to help salmon or those who fish for it.

It can not be said strongly enough – imposing an arbitrary hard cap on salmon bycatch in the trawl non-pollock groundfish fisheries has the potential for a huge economic loss for the harvesters, the processors and the communities with no direct link to improved salmon stocks. That type of action also does not meet the

requirements of the Magnuson-Stevens Act and its National Standards, specifically Standards 1, 2, 5, 7, 8, and 10 as described below.

National Standard 1: Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the Optimum Yield from each fishery for the United States fishing industry.

Gulf of Alaska groundfish fisheries are healthy and management measures are in place to ensure the sustainability of the groundfish stocks. NMFS has decided that 40,000 Chinook salmon can be caught in Gulf of Alaska fisheries without jeopardizing the abundance of ESA-listed Chinook salmon. A hard cap on Chinook salmon imposed on the non-pollock groundfish fisheries will likely result in early closures of some groundfish fisheries resulting in economic loss and preventing the fisheries from achieving Optimum Yield. There is no evidence that eliminating the incidental catch of Chinook salmon will directly benefit salmon stock abundance in Alaskan waters and rivers.

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

The scientific information available in the EA/RIR does not clearly articulate that imposing hard caps on the non-pollock fishery will result in Chinook salmon savings that affect the abundance of the stock. Page xv of the Executive Summary states "There is also no evidence to indicate whether the groundfish fisheries' take of Chinook salmon is, or is not, causing escapement failures in Alaska rivers." What the document does state is that a NMFS biological opinion has said that upwards of 40,000 Chinook salmon can be caught in Gulf of Alaska groundfish fisheries without jeopardy to the ESA-listed salmon stocks. It also indicates "it is not possible to draw any correlation between patterns of PSC and the status of salmon stocks."

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.

Incorporating these severe restrictions on the non-pollock groundfish fisheries in the Gulf will result in inefficiencies without the proper tools to address bycatch. This blunt instrument will further exacerbate the race for fish while stakeholders attempt to achieve optimum yield prior to any closure of a fishery.

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

The proposed actions have the potential to increase monitoring and operational costs with no real conservation benefit. Not only do the actions have the potential to reduce revenues significantly, the burden of monitoring and observation is

increased especially without the benefit of a thoughtfully structured bycatch management program.

National Standard 8: Conservation and management measures shall, consistent with the conservation requirements of this Act (including the prevention of overfishing and rebuilding of overfished stocks), 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.

The Magnuson-Stevens Act does not allow the Councils to disadvantage one community over another. Eliminating tens of millions of dollars in groundfish revenues to some communities in order to save a few thousand Chinook salmon which will likely not provide any additional benefit to other communities is contrary to the tenets of the Act.

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

Anytime management measures encourage a race for fish they are promoting dangerous fisheries that risk human life at-sea for not only the fishermen but the observers as well. A hard cap imposed on the non-Pollock groundfish fishery has the potential to exacerbate a race for fish – harvesters will feel pressured to secure as much landings up to the TAC prior to the premature closure of the fishery. This may result in dangerous fishing behavior.

These National Standards are not just guidelines for developing management measures. The standards are the specific metrics that the Secretary of Commerce must measure proposed actions against to implement fisheries management recommendations. The existing EA/RIR does not incorporate this type of comparative analysis and we believe this is a shortfall with the analysis.

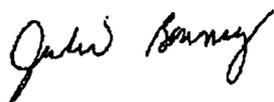
Conclusion

For all the reasons mentioned above we would like to see the Council focus more attention on the bycatch reduction management plan for the Gulf. While we recognize the strong political pressure to do something in the meantime regardless of the available scientific information, imposing an arbitrary hard cap will cause undue economic harm without corresponding benefit to salmon stocks. To that end, we recommend that the Council choose status quo if final action is taken at the June meeting. Based on all of the available information and the best available science, the most liberal alternative should be chosen resulting in the least amount of economic harm to the harvesters, processors and communities that rely on the non-pollock groundfish fisheries as part of their portfolio. Status quo is the only option that achieves these goals and also the only option that most appropriately balances the many competing National Standards outlined in the Magnuson-Stevens Act.

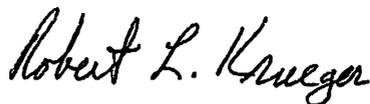
We continue to encourage the Council to push forward quickly to develop a bycatch management program for the Gulf of Alaska groundfish fisheries that will allow more strategic management and personal accountability to reduce bycatch of Chinook salmon. We, as majority stakeholders in these fisheries, are dedicated to continuing to work together with the Council to develop this bycatch management plan that will benefit harvesters, seafood processors and communities alike.

Thank you for your consideration of these comments.

Sincerely,



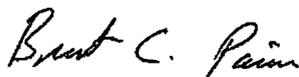
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RE: Agenda Item C-4: GOA Chinook Salmon Bycatch

May 28, 2013

Dear Chairman Olson & Council Members:

Thank you for the opportunity to provide input on the Council's recommendation for addressing Chinook Prohibited Species Catch (PSC) in the non-Pollock trawl fisheries in the Gulf of Alaska (GOA).

Alaska Groundfish Data Bank (AGDB) is a member organization that includes all of the shorebased processors located in the city of Kodiak and the majority of the trawl catcher vessels based in Kodiak. The Kodiak trawlers are mostly family owned businesses who have participated in the federal groundfish fisheries since Americanization of the fisheries. According to the analysis, 93% of the historical non-pollock catcher vessel trawl deliveries have been delivered into Kodiak; this action could have a significant impact on our members and the community we support.

The members of AGDB would prefer that the Council refocus its resources and energy on developing the necessary tools for bycatch management for the GOA trawl industry. Unfortunately, development of this management structure is extremely complex and challenging. Putting forward yet another bycatch measures package will only serve to further fragment the industry, increasing the challenges associated with developing an effective program of management measures. Adding a Chinook PSC cap to the many upcoming or newly implemented regulatory packages limits our ability to understand the cumulative impacts of these actions on our members and the different sectors that are dependent on these fisheries. As the recently adopted purpose and need statement for the GOA trawl bycatch management program states, "the current management tools in the GOA groundfish Fishery Management Plan (FMP) do not provide the GOA trawl fleet with the ability to effectively address these challenges [reduced Pacific halibut and Chinook salmon PSC limits], with regard to the fleet's ability to best reduce and utilize PSC." Yet here we are again with yet another bycatch management package before us.

If the Council truly feels that there is a compelling reason to move forward with this action we recommend the most liberal approach, status quo. However, if the Council chooses to impose a hard cap then the highest hard cap amount of 12,500 should be the limit. This would allow the most flexibility to maintain some fishing opportunity while preventing excessively high bycatch. As the problem statement notes, "it is necessary to evaluate management measures to protect against the risk of high Chinook salmon PSC in future years". This indicates that the action is about creating a backstop for Chinook PSC not creating a restrictive bycatch management plan. There are several reasons that warrant a liberal approach: 1) Inability of the fleet to manage bycatch without tools, 2) Linkage between trawl Chinook bycatch and concerns regarding the condition of Alaska Chinook runs, 3) Rigidity of hard cap management systems for bycatch versus systems that adapt to changes in Chinook salmon and groundfish abundance, and finally 4) NMFS limited ability to manage a hard cap in the present fishery condition.

1. Inability of the catcher vessel fleet to manage bycatch without the tools

Salmon PSC estimates: GOA trawl catcher vessels, non-pollock fisheries: As the analysis clearly points out numerous times, salmon in the non-pollock fisheries are a rare species and using rates derived from observer at-sea basket samples extrapolated out to the unobserved catch (by trip, sector, week, gear, target and area) results in estimates that are imprecise, highly variable and subject to change based on incoming and revised observer and landings data. A salmon cap is a high-precision management tool appropriate for fisheries that have the monitoring infrastructure to produce precise PSC estimates. Accurate estimates require that vessel observers take multiple samples from throughout the haul to obtain a large and representative sample. On the smaller GOA catcher vessels, basket samples are often collected in a less uniform manner because of the trawl deck layout and limited space. Estimates of rare species, such as Chinook salmon, are usually characterized by many zero haul estimates with an occasional large estimate derived from one or two Chinook counts in a sample. These estimates are unrepresentative of the actual haul by haul or trip by trip catch and lead to random assignment of large Chinook bycatch estimates to both the observed vessel on which the sample was taken and unobserved vessels that are assigned bycatch through the extrapolation. This does not allow for individual vessel accountability and it is essentially Russian roulette as to which boat gets the salmon hit.

To underscore this AGDB has collated the harvest and observer data for the Kodiak-based arrowtooth trips conducted between April 1 and May 9 of 2013. There were 68 arrowtooth target trips conducted by 16 vessels over this time period. Of these, 9 vessels carried an observer on 21 trips for a trip sample rate of 31%. The catch sample rate was 32%. 109 hauls were made on these observed trips of which 92 were sampled. Of these 92 sampled hauls, 0.9% of the catch was sampled (basket sample weights) with 90 hauls having zero salmon in the samples. For week ending April 20, one haul had one Chinook - this single fish extrapolated out to 141 Chinook for the trip (0.87 Chinook/mt); another haul on a different vessel (week ending May 4) had 3 Chinook in one sample (four of five hauls were sampled for the trip with zero salmon in those other hauls). These three fish extrapolated out to 875 Chinook for that trip (8 Chinook/metric ton of groundfish). These two salmon hits and the respective salmon bycatch rates aggregated from all observed vessels are then applied to the unobserved vessels and create the fleet-wide Chinook salmon PSC estimates based on a 3-week rolling average. These two basket samples affect the week that they were collected, the estimate for the week prior to the occurrence and finally the next week's estimate. Table 1 demonstrates how the estimates played out over the Arrowtooth fishery – 4 Chinook salmon in two basket samples resulted in a Chinook salmon PSC estimate of 3,737 fish.

The random, lightning strike, Russian-roulette nature of rare species sampling does not encourage behavioral changes on the part of the catcher vessel operator to avoid salmon. As such, operators are unlikely to change their behavior to avoid salmon bycatch unless salmon abundance is high. What is in the trawl alley does not translate to an accurate Chinook PSC estimate for the vessel.

Table 1. NMFS CAS salmon PSC estimates, CV sector, Area 630, arrowtooth target, non-pelagic gear.

W/E Date	Groundfish (mt)	Chinook (no.)	Rate (Chinook/mt)
6-Apr-13	1,606.9	28	0.017
13-Apr-13	709.3	39	0.055
20-Apr-13	1,917.4	408	0.213
27-Apr-13	780.8	1,041	1.333
4-May-13	586.6	1,671	2.848
11-May-13	353.5	550	1.556
18-May-13	301.7	0	0.000
Total	6,256.3	3,737	0.597

GOA pollock trawl fishery performance in 2012: The pollock fishery uses census offload data to create PSC estimates for Chinook. In this case what the vessel catches represents actual bycatch performance at the individual vessel level. When the hard cap for the pollock fishery was adopted industry believed that voluntary measures and coordination of the fleet could allow the fleet to voluntarily manage their Chinook bycatch. This assumed that the cap level adopted for the fishery was perceived by the fleet to be sufficient to support the fleet's pollock catches and thus prevent a desperate race for bycatch within the fleet to at least get some portion of the pollock catch. The analysis (page 98) discusses the challenge that the fleet and the managers faced in the fall of 2012 to manage the new hard cap for the pollock fishery. Industry expectations and actual fishery performance didn't match with the detonation of the voluntary quasi-cooperative plan due to unexpected participants entering the fishery, non-random limited observer coverage and late, additional and revised observer data over time. The results were TAC overharvest in the C season, TAC under-harvest in the D season, and observer extrapolations in excess of the PSC limit in the WGOA regulatory area. This was no fault of the inseason managers or the industry – it just underscores that the present management system does not provide NMFS with the ability to monitor PSC usage or the GOA trawl fleet with the tools to effectively control effort to reduce PSC.

Industry attitude towards voluntarily measures has shifted because of the experience over the last year. It is now perceived that any measures the fleet adopts cannot be policed. Some participants are motivated solely by personnel economic gain and do not adhere to the higher standard of what is best for the fleet overall – so future voluntary measures/catch plans seem highly unlikely unless required by NMFS to open the fishery. The new PSC limit has created a large amount of uncertainty and inefficiency for fishery participants which affects our businesses and could have been avoided with a properly designed catch share program.

Interaction of Salmon PSC limits and Halibut PSC limits: The best method to reduce bycatch is to spread the fishery out over time and space. However, the rigid halibut PSC cap allocations by deep and shallow complex over the calendar year, the competition for halibut PSC between the CP and CV sector, and competition between individuals within sector, cripple our ability to spread the fishery out over time and space to avoid both Chinook PSC and Halibut PSC. The problem is expected to be exacerbated once the newly adopted 15% halibut PSC cap reduction is adopted. The only way to spread the fishery out over time and space is with a properly designed catch share program.

2. Poor Run strength for Alaskan Chinook salmon Stocks Status won't be cured by reducing Chinook bycatch in the GOA non-pollock trawl fisheries

The Problem Statement notes, "...Limited information is available on the origin of Chinook salmon taken as bycatch in the GOA; it is thought that the harvests include stocks from Asia, Alaska, British Columbia, and lower-48 origin. Despite management actions by the State of Alaska to reduce Chinook salmon mortality in sport, commercial, and subsistence fisheries, minimum Chinook salmon escapement goals in some river systems have not been achieved in recent years..."

The preponderance of evidence suggests that the majority of the Chinook taken as bycatch in the GOA trawl fisheries are not from Alaska. Based on NMFS Auke Bay genetic stock identification (GSI) analysis of the 2011 Chinook caught in the GOA pollock fisheries, the composition is 40% British Columbia stocks, 26% U. S. west coast stocks, 15% Northwest GOA and 14% Coastal Southeast Alaska stocks. Many data caveats surround these estimates, but it is the best science available.

A report prepared for the NPFMC in 1983 found higher percentages of ocean-type (freshwater age-0) Chinook salmon in the GOA than in the Bering Sea. Freshwater age-0 fish are more common in the Pacific Northwest and California. However, hatcheries in Alaska have also released freshwater age-0 Chinook salmon. This observation suggests a significant component of the Chinook salmon bycatch is Pacific coast salmon and of hatchery production. Presently 200 to 250 million Chinook hatchery fry are released annually along the Pacific coast and these fry releases feed in the GOA. Environmental conditions presently favor NW and BC Chinook survival which increases Chinook salmon in the GOA resulting in more salmon for the fleet to try and avoid.

Chinook salmon PSC in the GOA non-pollock trawl fisheries in the Central and Western GOA tend to be smaller fish, averaging between 5 and 9 pounds. The State of Alaska generally uses assumed natural mortality rates of 40% for two year old Chinook, 30% for three year olds, 20% for four year olds, and 10% for five year olds and older.

Also Chinook salmon stocks from western Alaska do not spend time in the GOA before spawning in the western Alaska systems; Chinook salmon bycatch in the GOA is not affecting the AYK systems.

These factors all suggest that a reduction in salmon catch in non-Pollock trawl fisheries will not result in stock improvements for Alaska Chinook salmon. To the contrary, there are several statements that indicate that this cannot be known and that all information indicates there is probably not a direct link. What the analysis does show is that every ton of groundfish left in the water due to a premature closure of the fishery (i.e. prior to attainment of TAC or Halibut PSC cap) results in economic loss to the trawl industry and the shore-based businesses that rely on the industry.

Incorporating some assumptions gives some idea of the economic tradeoffs of the action. At a hard cap of 5,000 Chinook salmon (the lowest level for alternative 2), the analysis suggests the earliest closure impact at 42,000 mt, \$62 million in first wholesale revenue, and 3,350 avoided Chinook PSC. If you assume that 65% of the bycatch is age 2 and 35% age 3 and that 80% are not stocks of concern (hatchery BC, PNW, and SE) than this results in 446 fish saved. This is an overestimate of benefit to Chinook stocks since no additional natural mortality is assumed nor do all these "saved" fish return to the river system that very same year.

3. Treatment of the CGOA Rockfish Program (Rigidity of hard cap management system)

AGDB is the inter-cooperative manager for the seven shorebased rockfish cooperatives. The rockfish program has been in place for seven years and was created to meet multiple community, social, economic and conservation objectives. The flexibility of the cooperative structure allows us to balance all these objectives based on actual fishing conditions and adjust harvest timing and location as appropriate to meet the following objectives:

- a. Processor workforce— Stabilize the residential workforce by allowing harvesting and processing to occur during the months of May and June and removing the conflict with the salmon processing when the fishery traditionally occurred in July.
- b. Reduce halibut bycatch – the fleet is using a combination of pelagic, non-pelagic and semi-pelagic gear to catch their rockfish and avoid halibut which has downstream benefits to benthic habitat.
- c. Provide flexibility for the vessels' fishing plans – Fishing rockfish in May and June allows vessels to fish BS AFA pollock at the beginning of the B season when Chinook salmon bycatch is low versus being pushed into the months of September or October when Chinook salmon bycatch rates are higher. It also frees up vessels for salmon tendering contracts in the months of July and August.
- d. Product value – Improve product quality and spread out the harvest over longer periods to increase ex-vessel value.

The cooperatives added Chinook salmon bycatch management provisions in the inter-coop agreement in 2009 for hotspot reporting and avoidance. This objective was added to the cooperatives list even though there was no regulatory requirement or consequence for high Chinook salmon bycatch within the program. Additionally, because of the lack of stock of origin data for the Chinook salmon bycatch in fishery, the co-ops started a self-funded stock of origin data collection project for all Chinook salmon caught in the 2013 shoreside rockfish program. The goal is to collect tissue samples and coded wire tags (CWT) from all Chinook caught as bycatch in the CV CGOA rockfish fisheries. This is a collaborative effort with NMFS Auke Bay, NMFS Alaska Region, North Pacific Observer Program and industry – it is expected to be at least a 3-year project. The science will aid in understanding the impacts of the fleet's bycatch on particular Chinook salmon stocks and give the cooperatives the best scientific information to inform a bycatch management plan. Chinook salmon bycatch management could then be based on best available science instead of speculation.

This year's rockfish fishery underscores how fishing conditions change annually. Operators suggest that the ocean conditions are different this year in several ways: Water temperatures are four degrees warmer than last year, ocean color is greener suggesting more plankton in the water column and the feed band is all along the slope area, the traditional rockfish fishing grounds. These changes in ocean conditions translated into high Chinook salmon bycatch this year with eight hotspot notices issued after the fishery start date of May 1, virtually in every area that the fleet fishes. The Kodiak shorebased Rockfish cooperatives took action to control their incidental take of Chinook by requiring a two-week stand-down on all rockfish trips for the month of May and developed a slow restart of the fishery on June 1 to monitor and control Chinook bycatch. All these measures were adopted voluntarily.

Hard caps are a poor method for bycatch management; the hard cap does not incorporate flexibility for changes in abundance of either target groundfish catches or Chinook salmon or the ability to manage multiple management objectives. As the analysis points out, future Chinook PSC levels are unpredictable, as are the timing and location of high trawl-Chinook interactions. At the recent *Managing Our Nations Fisheries 3* conference, community interest groups were advocating for ecosystem based management through cooperative management structures versus rigid regulated fishery management structures.

From a co-op management perspective, flexibility is a key component to creating cooperation amongst the harvesters and processors with the ability to develop a realistic management structure that can balance multiple objectives. The rockfish program was originally called a "pilot program"; we are suggesting that we adopt a "pilot program" approach for Chinook salmon bycatch management. This removes the debate about picking a number and focuses the discussion on co-op transparency and accountability.

Being creative with a non-hard cap management structure for the RP acknowledges the good efforts of the industry, allows for increased flexibility based on fishing conditions, allows the co-ops to incorporate best available science into management practices over time and allows the co-ops to balance multi-program objectives.

The reason that a traditional hard cap is problematic:

Census versus Basket sampling: The rockfish program includes allocations of primary rockfish, secondary species and halibut PSC. Every year a substantial portion of the halibut PSC is not used due to changes in fishing practices and the halibut PSC allocations to the program. This extra halibut greases the wheel for collaboration within the cooperative. Halibut bycatch estimates are based on basket samples so actual individual vessel performance may not be representative; since there is enough halibut it is not a source of conflict within the cooperative. For example, one vessel trip may be the one that represents the catch up for halibut PSC estimates for the other nine trips with zero estimates within the co-op. Under a constraining cap, the vessel whose catch resulted in this single high estimate is likely to be penalized, despite the absence of a strong rationale for distinguishing the vessel. The halibut buffer prevents destructive behaviors due to fears that individual vessel strikes will decimate that individual vessel quota share account or even worse put the co-op at risk of exceeding the co-op halibut cap. Other performance standards are used within the co-ops to evaluate individual vessel performance for best use of halibut PSC instead.

The motion contemplates three methods for allocating Chinook salmon PSC to the rockfish fishery: to the program, to the sector or to the cooperative. The allocations to the co-ops are too small to manage (EA-page 177). Additionally changing to a full census approach to manage caps allocated to entities comes with huge management costs (EA-229). AGDB therefore does not support allocation of PSC to co-ops if a hard cap alternative is chosen but instead to the sector. There are currently mechanisms available to the cooperatives to hold individual vessel's accountable for their behavior. However, using PSC estimates requires a Chinook salmon buffer if a hard cap alternative is chosen.

Historical usage: The Rockfish program was changed in 2012. The years allocating catch histories changed from 1996 – 2002 to 2000 – 2006 which resulted in an increased allocation for the CV sector. Additionally, the trawl entry level fishery and the limited access option were eliminated; all which resulted in higher allocations of primary, secondary species catches to the catcher vessel sector. This means that the CV sector has more fish to catch than what occurred from the historical time clip of 2007 – 2012. On top of that the CV sector has already put in place tools to coordinate cooperative harvests to reduce Chinook PSC. Allocation based on historical usage punishes this good behavior. Here again, if a hard cap is chosen, additional fish would need to be allocated to the sector since historical usage is not representative of current conditions in the fishery.

4. NMFS limited ability to manage a hard cap in the present fishery condition

The agency has stated that they are going to have an extremely difficult time managing a cap due to the fast pace of the fisheries, the method by which PSC amounts are estimated (basket samples) and the continuous updating process of the PSC estimates. NMFS suggests that they will likely need to take a conservative inseason management approach impacting the ability of the fleet to fully harvest target species, especially in fast-paced fisheries and in years of high PSC and if multiple hard caps are adopted. The challenges will be escalated for the catcher vessel sector, due to the timeliness of data and high variance in the estimates.

The EA does not contemplate the effect of this management plan, which will require closures well before any limit is reached. Nowhere does the analysis contemplate the economic effects of this inseason management approach; all of the tables assume that fisheries would close when the limit is reached, not taking into account the uncertainty buffer that is required for managers to stay at or below the cap based on the present race for fish and monitoring system. The economic impact is seriously underestimated at any given limit. There is no way that our members can understand the true impact of this action.

Trade-offs for the hard cap alternative and selection of options and suboptions

Adopting hard cap management in the non-pollock trawl fisheries does not meet the practicability standard in the MSA. Therefore our members support status quo for final action. If the Council chooses instead to move forward and adopt a hard cap then the highest cap level should be chosen.

There are multiple options to create a hard cap alternative. Each combination has trade-offs. The AGDB members do not support sacrificing other CV non-pollock trawl fisheries to appropriately fund the Rockfish program if a separate hard cap is chosen for the Rockfish program. Both components of the catcher vessel fisheries, limited access and the Rockfish program, need the appropriate amount of fish to fund our fisheries; otherwise only one cap should be created.

If caps are created by sector (CV and CP) the overall salmon cap has to be large enough to support each sector. More caps require more fish otherwise the boxes get too small to manage the fisheries.

With these caveats, if the Council chooses to push forward with adopting a hard cap, our members would propose: Alternative 2 hard cap limit of 12,500 Chinook – option 2. Apportioned limit by operational type (CV and CP) b. apportion proportional to historical average bycatch of Chinook salmon (5-years). For the rockfish program we support a cooperative measures management approach without

a specific Chinook PSC limit. Under this approach, the inter-cooperative, in coordination with the seven shorebased cooperatives, would develop its own measures to address Chinook PSC and report to the Council annually. Such an approach would provide cooperatives with the flexibility to address Chinook PSC without fragmenting what has become an effective, coordinated fleet and would hold the co-ops accountable with Council oversight. We also support Alternative 3 which requires full retention of salmon so that stock of origin information can be collected to inform future Chinook salmon bycatch management.

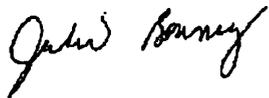
Conclusion

We would caution the Council that it may seem easy to hold the trawl vessels responsible for their own demise if they can't operate under another bycatch cap; however, the trawl harvesters are only one of the many sectors reliant on these groundfish harvests. The Kodiak shorebased processors, the Kodiak service sector and community of Kodiak will all feel the economic pain if the quotas are not fully harvested and the trawl harvesters can't adjust their behavior to some idealistic bycatch standard in the present fishery condition.

We encourage the Council to push forward on an expedited timeframe to develop a GOA trawl bycatch management program that mitigates the impacts of a derby-style race for fish, creates cooperative level accountability and recognizes the historical dependency of the harvesters, processors and coastal communities on the fishery resource.

Thanks for the opportunity to comment.

Sincerely,



Julie Bonney
Executive Director
Alaska Groundfish Data Bank, Inc

Subject: Agenda Item C-4, Final Action: GOA Chinook Salmon by-catch in non-pollock trawl fisheries
From: Jaime Portillo <jportillo@npsi.us>
Date: 5/28/2013 4:21 PM
To: "'npfmc.comments@noaa.gov'" <npfmc.comments@noaa.gov>
CC: Matt Moir <mmoir@npsi.us>, 'agdb ' <IMCEAMAILTO-agdb+40gci+2Enet@npsi.us>, "'jbonney@gci.net'" <jbonney@gci.net>

Good afternoon.

My name is James Portillo and represents the Fil-Am Association of Kodiak. The attached letter to the Chairman, NPFMC, Eric Olson is what our views and how we feel if this proposal will push through and how it will affect us, who mostly depend on cannery jobs around Kodiak to sustain our everyday needs.

We hope that the Chairman will consider our request.

Thanks much.

James
Vice President, Fil_Am
Kodiak, AK

— Attachments: —

Ltr to Chairman Olson.PDF

196 KB

Eric Olson, Chairman
North Pacific Fishery Management Council
605 W. 4th. Suite 306
Anchorage, AK 99501-2252
Fax (907) 271-2817
npfmc.comments@noaa.gov

May 24, 2013

Re: Agenda Item C-4, Final action GOA Chinook salmon by-catch in non-pollock trawl fisheries

Chairman Olson:

The undersigned officers and members of the Filipino American Association of Kodiak and our families have a long history and vested interest in Kodiak's seafood processing industry. Many of our members and their families are employed by the canneries and depend on the diverse year-round seafood landings for stable, long-term employment. Whereas we depend on all seafood deliveries for our livelihood, including salmon, the Kodiak Trawl fleet delivers 60-70% of all the seafood landed in Kodiak and it is these large deliveries throughout the year (Pollock, cod, rockfish and flatfish) that help keep the cannery workers employed. We need to work to support our families throughout the entire year not just have work for a few months.

No one likes by-catch and Chinook salmon are vitally important to Alaskans and to our communities. But this seems to us to be a political issue based on headlines and emotion, not science. No one knows why the Alaska Chinook runs are down but there is no evidence that putting a limit on the non-pollock trawl fisheries is going to help the Alaska Chinook salmon runs. Shutting down the trawl fisheries will have serious effects on our members and the community of Kodiak, yet benefit to the salmon is not known.

It is easy to suggest that the trawl industry will be responsible for its own demise if they can't operate under this by-catch cap; however, the trawl harvesters are only one of the many dependent sectors reliant on these groundfish harvests. The Kodiak shorebased processors, the Kodiak service sector and community of Kodiak will all feel the economic pain if the trawl groundfish harvests decline because the harvesters can't adjust their behavior as some speculate.

The rockfish program was developed specifically to benefit the Kodiak processor workforce by moving the fishery out of July and filling processor labor voids in May and June. It has freed up processing capacity for the commercial salmon fishery and made trawl vessels available for tendering. This small catch share fishery which is now in its seventh year has benefited the Kodiak residential processing workforce and the salmon industry overall. This fishery needs its own Chinook salmon management regime and should be treated separately from the other non-pollock trawl fisheries so the fishery can continue to meet economic, social and conversation goals that benefits the community of Kodiak overall.

Please keep in mind the interests of Kodiak's canneries and cannery workers who will be heavily impacted by your decisions.

We hereby attached our specimen signatures to this effect.

Sincerely,

Officers and Members, Filipino-American Association of Kodiak
627 Shelikof Street
Kodiak, AK 99615

OFFICERS & MEMBERS FILIPINO-AMERICAN ASSOCIATION OF KODIAK

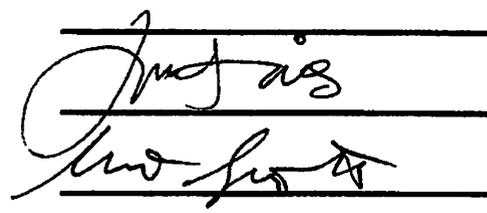
<u>Printed Name</u>	<u>Signature</u>
<u>James A. Portillo - Vice President</u>	<u>[Signature]</u>
<u>Arnold Dookero - Sgt At Arms</u>	<u>[Signature]</u>
<u>Miles Quemado - Member</u>	<u>[Signature]</u>
<u>Elvira Mercado - Member</u>	<u>[Signature]</u>
<u>Rodolfo Mercado - Member</u>	<u>[Signature]</u>
<u>Riza Torres Ferreras (Member)</u>	<u>[Signature]</u>
<u>NILY L. LARGO (Member)</u>	<u>[Signature]</u>
<u>LOBYLIN C. SANTIAGO (MEMBER)</u>	<u>[Signature]</u>
<u>REY SALGATAR</u>	<u>[Signature]</u>
<u>Evelyn SALGATAR</u>	<u>[Signature]</u>
<u>[Signature]</u>	<u>[Signature]</u>
<u>Antonio V. Masaly</u>	<u>[Signature]</u>
<u>FERDAN SANTIAGO</u>	<u>[Signature]</u>
<u>MEDARDO GANAL</u>	<u>[Signature]</u>
<u>Cecilia MADVIAGA</u>	<u>[Signature]</u>
<u>EDWIN MAYO</u>	<u>[Signature]</u>
<u>Dante T. Nido</u>	<u>[Signature]</u>
<u>Francisco Fongorito</u>	<u>[Signature]</u>

OFFICERS & MEMBERS FILIPINO-AMERICAN ASSOCIATION OF KODIAK

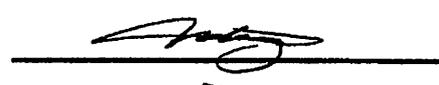
Printed Name

Signature

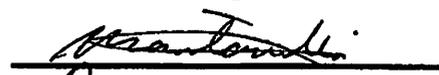
Johis C. Kufasch SR.
MEMBER ARROGANTE 75



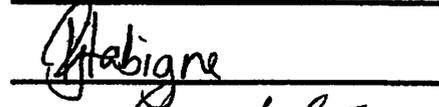
MORVILLE DELA CRUZ



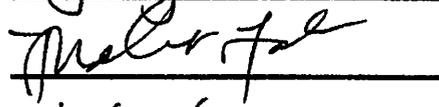
Mike Antonelli



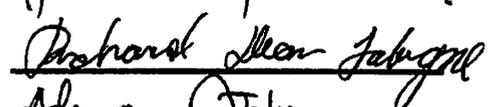
Ronald James Tabigne



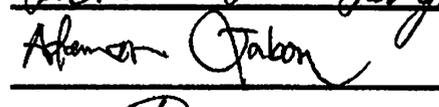
MELCHOR TABON



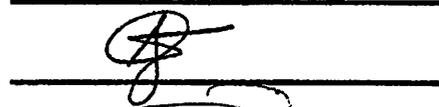
Richard Dean Tabigne



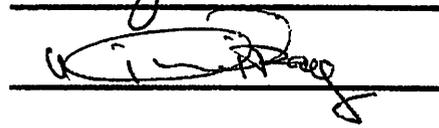
ADEMAR TABON



Larry A. Angeles



Winnie VIZAY ^{sargeant at arms} (O.C.)



CREWMEN'S ASSOCIATION

Steve Branson, President.

Box 451 Kodiak, AK 99615

NPFMC, Erik Olson, Chair

605 w 4th Ave, suite 306

Anchorage, AK. 99501-2252

RE; C-4 GOA Chinook Salmon Bycatch

Dear Councilmembers and chair;

I feel it is my duty to point out publicly that prior privatization based FMPs have resulted in diminished quotas due to dwindling biomass, a weakening of fishing communities, job loss due to consolidation, drastically reduced layshare compensation for the actual working fishermen and the impression of a veritable cast system in the rationalized fisheries.

Further privatization will only hurt crew and fishing communities , and judging by the track record of prior programs, the decline of stocks given away. Bycatch reduction can be achieved without gifting what little remains of our once public resource to a tiny percent of our fisheries dependent population.

FMPs should be based on science, not capitol.

Thank you for your consideration,

Steve Branson

Crewmen's Association

C-4 GOA Chinook Salmon Bycatch in non-pollock trawl fisheries

The AP recommends that the Council adopt the following alternative and options as revised (in **bold/underline**) for final action:

Alternative 2 – **10,000** Chinook salmon PSC limit (hard cap).

[Motion passed 13-7]

Option 2: Apportion limit by operational type (CV vs. CP).

(a) Apportion proportional to historic average bycatch of Chinook salmon (5-year average)

Option 3: **For the CP sector**, no more than 66% of the annual hard cap limit can be taken before June 1.

Option 4: Separate Chinook salmon PSC limit hard cap to the CGOA **CV** rockfish program **sector**:
(a) **1,500 from the CV sector's apportionment**

Suboption 2: Any time after September 1, the CV rockfish Intercooperative can communicate with the agency to roll over all but 100 remaining CV Rockfish Program Chinook salmon to support other fall non-pollock trawl fisheries

Alternative 3: Full retention of salmon.

Vessels will retain all salmon bycatch until the number of salmon has been determined by the vessel or plant observer and the observer's collection of any scientific data or biological samples from the salmon has been completed.

Motion as amended passed 13/7.

Rationale:

- *A 10,000 Chinook hard cap strikes an appropriate balance between preserving Chinook salmon and preserving the value of the groundfish trawl fisheries.*
- *Apportioning to sectors by historic PSC addresses the difference between fisheries and is consistent with previous Council actions.*
- *Divisions within each sector are responsive to requests from those sectors.*
- *Full retention of bycaught salmon will facilitate the collection of genetic data to help understand the stocks of origin.*

Minority Report: *A minority of the AP did not support the motion, and supported an amendment to set the total cap at 6,500. Chinook salmon stocks throughout Alaska are at disastrously low levels and commercial, sport and subsistence fishers are facing drastic reductions in catch—or even complete fisheries closures—at great economic cost. We have little information about the stock of origin of the salmon caught as bycatch. Given the lack of data we should proceed with a precautionary approach and set bycatch limits which will protect struggling Chinook salmon stocks. National Standard 9 requires that we reduce bycatch: setting a bycatch limit at a level that's only been exceeded once in the past 10 years does not reduce bycatch and is not responsive to the Chinook salmon crisis we're currently facing in Alaska. Signed by: Tim Evers, Becca Robbins Gisclair, Theresa Peterson, Jeff Farvour, Alexis Kwachka, Chuck McCallum*



Kodiak Island Borough
710 Mill Bay Road, Rm. 101
Kodiak, AK 99615
907.486.9310



City of Kodiak
710 Mill Bay Road, Rm. 220
Kodiak, AK 99615
907.486.8636

May 29, 2013

Mr. Eric A. Olson, Chair
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Dear Chairman Olson:

Re: Agenda Item C-4, GOA Non-Pollock Trawl Chinook Salmon Bycatch

The communities of Kodiak Island are following closely the various agenda items dealing with prohibited species catch (PSC) management in the Gulf of Alaska (GOA) groundfish trawl fishery. We wish to comment here on specific action to establish a PSC limit on the taking of Chinook salmon in GOA non-pollock trawl fisheries.

The City of Kodiak and the Kodiak Island Borough presented two joint resolutions to the North Pacific Fishery Management Council (NPFMC) in October, 2012. The overarching purpose and goals expressed in those resolutions centered upon promoting a vigorous economy in the Kodiak region, with healthy and competitive markets providing effective controls on bycatch; maintaining or increasing target fishery landings; maintaining or increasing local employment; maintaining entry opportunities in the harvesting and processing sectors; minimizing the adverse impacts of consolidation; maximizing active participation by owners of vessels and fishing privileges; and maintaining the economic strength and vitality of Kodiak's working waterfront.

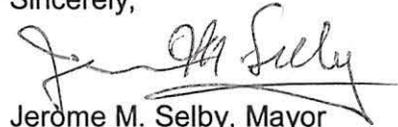
We encourage you to carefully balance the requirements of National Standards 1, 8, and 9 to achieve optimum yield, to minimize adverse economic impacts to dependent communities, and to minimize bycatch to the extent practicable as you decide upon an appropriate PSC limit for Chinook salmon bycatch. While recognizing the Council's need to address reducing bycatch, it should be noted that our local economy depends upon landings and processing of seafood, a large portion of which in Kodiak comprises non-pollock trawl-caught groundfish. As local governments, we have not come to a decision upon any specific option or bycatch limit, but we are in full agreement that the NPFMC needs to recognize the importance of both conservation and the development of fisheries resources.

We do suggest that you consider a requirement for the full retention of Chinook salmon in the non-pollock trawl fisheries similar to requirements in the pollock trawl fishery, which could aid in full accounting as well as potential biological sampling and data analysis.

Of particular importance will be further Council action on a comprehensive approach to bycatch management (Agenda C-5). The recent imposition of reduced limits for halibut PSC and new limits for Chinook salmon PSC, increase the demand for effective ways that the commercial fleets can achieve such PSC reductions.

Thanks as always for your attention. We hope that your actions will help us maintain and enhance the economy, employment, and social wellbeing of the Kodiak region.

Sincerely,



Jerome M. Selby, Mayor
Kodiak Island Borough



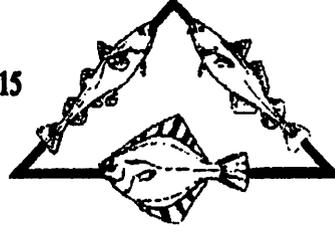
Pat Branson, Mayor
City of Kodiak

Alaska 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
Katy McGauley, Fisheries Biologist agdb@gci.net



Agenda Item: C-4

SEPARATE TREATMENT FOR THE CV ROCKFISH FISHERY IF A HARD CAP, ALLOCATION NEEDS TO BE NO LESS THAN 1,500 FISH

- 1) There is no ability to control salmon PSC estimates in the Non-Rockfish groundfish CV fisheries so a separate treatment for the program at least preserves the rockfish fishery. The Rollover provision could allow the CV sector to bank salmon "savings" to allow non-pollock groundfish harvests in the fall.
- 2) Larger catches in the new rockfish program compared to the rockfish pilot program:
Table 1. Chinook PSC, total CV rockfish harvests and Chinook PSC rate for the RPP (2007-2011) and the first year of the new Rockfish Program (2012). Catcher vessel co-ops only. Rate calculated using in-season source. Source: Steve Whitney, NMFS.

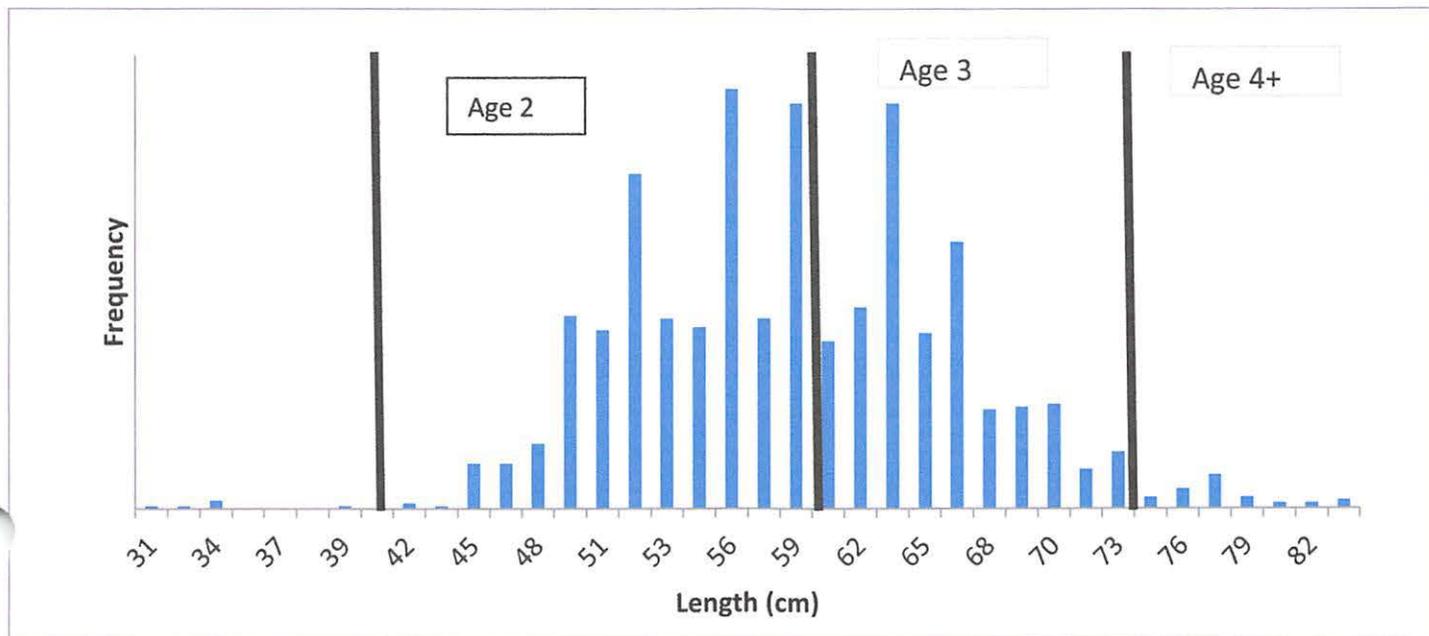
Year	Chinook (no.) in EA	Chinook (no.) in season	Rockfish Harvest (mt)	Rate (Chinook in season/mt)
2007	483	840	7,748	0.108
2008	1,649	1,683	7,440	0.226
2009	773	892	6,874	0.130
2010	965	1,017	7,992	0.127
2011	397	396	7,071	0.056
2012	817	817	10,067	0.081
Average	847	941	7,865	0.120

Combination of increased quotas, changes in allocation due to change in the year suites (1996-2002 versus 2000 – 2006) between RPP and RP program, elimination of the entry level and limited access fishery which allowed full harvest.

- 3) Rockfish co-ops have worked to reduce bycatch rates by voluntary measures (see rates in table above by year). Please don't punish the fleet for good behavior by giving the program a lower number. A lower number removes flexibility when salmon abundance is high.
- 4) Need to manage multiple objectives of the program:
 - a. Processor workforce: Stabilize the residential workforce by allowing harvesting and processing in May and June and removing the conflict with the salmon fishery.
 - b. Reduce Halibut bycatch: Tradeoff for Chinook salmon avoidance and halibut avoidance.
 - c. Product value: Improve product quality and spread fishery out over longer periods.
 - d. Vessel Fishing plans: Allows vessels to fish BS AFA pollock at the beginning of the B season versus pushing harvests into the fall. Frees up vessels for tendering contracts.
 - e. Reduce Chinook salmon bycatch: Co-ops have implemented hotspot reporting.

- 5) Cooperatives response in 2013 – highest bycatch ever seen in the program
- Two week shut down in 2013 with a slow re-start commencing on June 1st.
 - Initiation of Industry funded stock of origin data collection: biological data, tissue samples, CWT, and fin clip for every by-caught fish. Preliminary size comps suggests virtual all the bycatch is either age 2 or age 3 fish.

Preliminary size composition of bycaught Chinook in the 2013 Rockfish Program, catcher vessel sector:

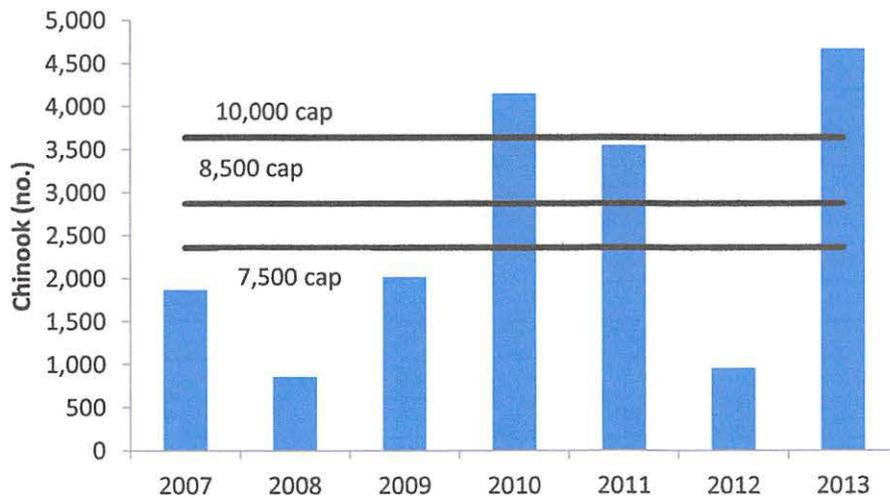


Estimated loss of Alaska Chinook stock of concern based on estimated age composition, mortality by age and stock of origin composition.

Cap	% comp	5,000	7,500	10,000	12,500
Age 2	0.65	3,250	4,875	6,500	8,125
Age 3	0.35	1,750	2,625	3,500	4,375
Mortality	Mort rate				
Age 2 mort	0.4	1,300	1,950	2,600	3,250
Age 3 mort	0.3	525	788	1,050	1,313
Total mort		1,825	2,738	3,650	4,563
Saved (all)		3,175	4,763	6,350	7,938
Saved stocks of concern		635	953	1,270	1,588
Difference between 5,000 cap		0	318	635	953
Difference between 7,500 cap		0	0	318	635
Difference between 10,000 cap		0	0	0	318

NPFMC Agenda Item C-4 GOA Chinook Salmon Bycatch
 Julie Bonney, Alaska Groundfish Data Bank. June 8, 2013

Figure 1. Non Rockfish Catcher Vessel caps and Historic non-rockfish Chinook PSC usage. 2013 data from NMFS Catch reports through May 25.



Catcher Vessel - Historical non-rockfish Chinook PSC usage

Year	Chinook
2007	1,869
2008	857
2009	2,019
2010	4,152
2011	3,549
2012	957
2013	4,668

CV Rockfish and non-rockfish cap calculations:

Cap	% CV*	Total CV Chinook	Chinook needed for Rockfish	Chinook remaining for Non-Rockfish
10,000	51.45%	5,145	1,500	3,645
8,500	51.45%	4,373	1,500	2,873
7,500	51.45%	3,859	1,500	2,359

*proportion to historic average bycatch of Chinook salmon PSC (5-year average)

JH

Paul R Seaton

Beth Kuttel

Bye Edymon

Peggy Wilson

Daniel J. [unclear]

William King

7.7

Alan Austerman

Wood Foster

B. P. Nagel

Jan

Chinook and halibut species. Specifically, we ask that you:

1. Reduce the Chinook salmon bycatch cap limit in the GOA pollock trawl fishery. The cap is currently set at 25,000 fish, which exceeds the ten-year bycatch average of the fishery.
2. Establish a hard cap of 5,000 Chinook or less for the GOA non-pollock trawl fishery, which currently operates without limits.
3. Implement additional reductions in halibut bycatch caps in the GOA via the GOA trawl bycatch management program which the Council is currently developing. Your action last year to further reduce the halibut bycatch cap by 15% is a good start and we support your efforts to focus on trawl halibut bycatch management in the Gulf. However, the health of the halibut stocks requires more immediate reductions to bycatch.
4. Increase observer coverage in the GOA trawl fisheries to 100% in order to gather accurate assessment of bycatch numbers. It is unacceptable that the current observer program only allows for 14-15% coverage in the fisheries that have the highest bycatch of Chinook and halibut.

We believe that setting lower limits in the pollock and non-pollock GOA fisheries for Chinook and halibut, providing more effective incentive programs, and increasing observer coverage to 100% would be the most responsible conservation actions that the Council can take in restoring and preserving our declining stocks. We appreciate the great responsibility of the Council to manage the future of our fisheries and we encourage expedient, comprehensive decisions that protect our Chinook, halibut, and the fishers who depend on them for food and livelihood.

Sincerely,

The Alaska House Bush Caucus

Representative Bryce Edgmon (Chair)
Representative Alan Austerman
Representative Eric Feige
Representative Neal Foster
Representative David Guttenberg
Representative Bob Herron
Representative Beth Kerttula
Representative Jonathan Kreiss-Tomkins
Representative Cathy Muñoz
Representative Benjamin Nageak
Representative Paul Seaton
Representative Peggy Wilson



Alaska House Bush Caucus

Representative Bryce Edgmon, Chair
Alaska State Legislature
Capitol Building, Room 410
Juneau, AK 99801

March 15, 2013

Eric A. Olson, Chairman
North Pacific Fishery Management Council
605 W. 4th Ave, Ste. 306
Anchorage, AK 99501-2252

RE: Gulf of Alaska Bycatch

Dear Chairman Olson and Members of the Council:

Alaska's Chinook salmon and halibut fisheries are of utmost importance to our state. They are cultural icons for Alaska Natives and non-Natives, a significant source of food in both subsistence and recreational fisheries, and a critical source of income for our commercial and charter fisheries.

The Bush Caucus is a bipartisan working group composed of 12 of the 40 members of the Alaska House of Representatives. The Bush Caucus represents rural and coastal Alaska. Our districts cover approximately 98% of Alaska's 6,649-mile coastline, from the Alexander Archipelago to the Arctic Ocean. We, along with many of our commercial, subsistence and recreational fisherman constituents, are very concerned about the effects of trawl bycatch on the increasingly poor Chinook runs and declining halibut stocks.

Federal fishery disasters have been declared for 2008-2012 for the Yukon River, 2011-2012 for the Kuskokwim River, and 2012 for Cook Inlet. As a result of the poor Chinook salmon returns, subsistence, commercial and sport fisheries have been severely restricted to protect our Chinook salmon stocks. However, these same Chinook salmon are caught as bycatch and discarded in both the Bering Sea pollock and Gulf of Alaska (GOA) groundfish fisheries.

Halibut stocks are also in decline throughout Alaska. Stock size is declining for unknown reasons and the number of fish is declining in many regions as well. Commercial and sport charter halibut fisheries have also been dramatically reduced in response to the declining resource: in some areas commercial catch limits have been reduced by over 60%. These same halibut are caught as bycatch in the GOA – under current regulations over 4 million pounds of halibut can be legally caught and discarded in all combined fisheries. The high GOA bycatch allowance in the pollock trawl fishery and lack of any cap in the non-pollock fishery are simply unacceptable.

As subsistence, commercial, and sport fishers reduce their catches of these critically important species, the Council must require the GOA trawl fisheries to reduce their bycatch of both

June 2013

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: C-4 Chitwuk PSC

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
X 1	Jonw Bayvin	AK Safford Co-op
X 2	Bill Hayes / Dave Wood	US Safford
X 3	Rob Sanderson Jr	TSH central council
X 4	VINCE O'SHEA	DSPA
X 5	George Hutchins	Myself
X 6	Susan Robinson	Fishermen's Finest
X 7	Jonathan Kreiss-Tompkins	(AK House of Reps)
X 8	Lori Swanson + Todd Loomis	Groundfish Forum
9	Darren Muller	Ouzinkie
X 10	BILL MCGILL	FCA
X 11	BETH Stewart	Peninsula Fishermen's Coop -
X 12	Jan Warenduk	Oceana
X 13	Bob Krueger	AK Whitefish Trawlers Assoc.
X 14	David Ison	Boat company
X 15	Tim Evers	Self
X 16	ALEXUS KWACHKA	SELF
X 17	Theresa Peterson	Amec
X 18	Jessie Selby + DENBY LLOYD	KODIAK IS. BOROUGH / CITY OF KODIAK
X 19	Erik Forrer	Salmon fisherman
X 20	Heather Mann	Midwater Trawlers Cooperative
X 21	Julie Benney	AGDB
X 22	Kurt Schrank	Self
X 23	Wancy Hyslop	Pioneer of Astoria Fisheries Inc.
X 24	Dan Ashken	FLV Gold Rush
25	George Pletnikoff	AIRC

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.