

Serving the fisheries of the Bering Strait Region.

Brevig Mission Diomede Elm Gambell Golovin Koyuk Nome Satir Michael Savoonga Shaktoolik Stebbins Teller Unalakleet Wales White Mountain

March 26, 2013

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

Dr. Jim Balsiger, Regional Administrator
NOAA Fisheries, Alaska Region
PO Box 21668
Juneau, AK 99802

Re: Agenda Item C-6 (d) Industry Progress Report on BSAI Chum Salmon Bycatch / Request for public release of industry proposals prior to Council review

Dear Mr. Olson, Dr. Balsiger and Council members:

Norton Sound Economic Development Corporation (NSED C) is the Community Development Quota (CDQ) management organization representing the CDQ program's northernmost 15 communities. Chum salmon are a significant and important cultural, subsistence and commercial resource for the communities and residents of our region. NSED C places a high priority on maximizing the return of chum salmon to our region and minimizing the impact of the Bering Sea trawl fisheries on Western Alaska salmon stocks.

In the interest of protecting Western Alaska chum, NSED C has advocated that the North Pacific Fishery Management Council (NPFMC) favor bycatch management measures that give strong consideration to the run timing of Western Alaska chum salmon. The months of June and July are critical for the chum salmon returning to the rivers that support NSED C's member communities, and NSED C believes bycatch avoidance measures should primarily be focused on this time period.

NSED C maintains this position even though the NPFMC put on hold the Environmental Analysis (EA) process for standalone chum bycatch management measures at its December 2012 meeting. With the Council now asking industry to present proposals for incorporating chum avoidance into their Chinook Incentive Plan Agreements (IPA) in lieu of continuing the more formal EA process, NSED C wants to be assured that the opportunity for public participation is not curtailed or diminished. To this end, NSED C asks that industry proposals to be considered by the Council be made available for public review prior to the NPFMC meeting at which they are to be presented. All stakeholders in the process would be better served if the proposals are released in the same manner as is done for review documents in the EA process.

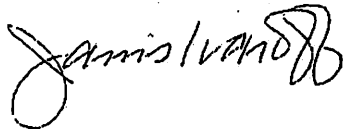
"NSED C will participate in the Bering Sea fisheries to provide economic development through education, employment, training, and financial assistance to our member communities."

P.O. Box 358 Nome, Alaska 99762 Phone: 907-443-2477 Fax: 907-443-2478

Perhaps such a release is already planned, and, if so, we thank the Council. If not, we request that the Council do so. Allowing a review of the proposals prior to the meeting gives those who were not involved their chance to fully voice comments, concerns and suggestions. The Council and its process will be best served when all parties have had an adequate chance to examine what is on the table and offer meaningful input.

We are hopeful that the forthcoming proposals will contain meaningful protections for Western Alaska chum salmon while also conserving Chinook salmon and allowing the fishery to operate as efficiently as possible. NSEDC looks forward to reviewing the proposals prior to the NPFMC October meeting, or whichever meeting they are to be considered.

Sincerely,

A handwritten signature in black ink, appearing to read "Janis Ivanoff". The signature is written in a cursive style with a large, looping initial "J".

Janis Ivanoff, President & CEO



YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

March 26, 2013

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

RECEIVED
MAR 26 2013

Re: Agenda Item C-6(c) and (e) Salmon PSC, D-2 Staff Tasking

Dear Chairman Olson and Council members:

We are submitting these comments on behalf of the Yukon River Drainage Fisheries Association (YRDFA), an association of commercial and subsistence fishermen and women on the Yukon River in Alaska with a mission of promoting healthy, wild fisheries and cultures on the Yukon River. The region we represent is home to some of the world's most magnificent salmon resources, and the world's furthest migrating salmon runs on the Yukon River. These salmon provide a primary source of food and are essential to the continued viability of the subsistence way of life in Western Alaska. For many residents the commercial salmon harvest also provides the only means of income for those who live in the remote villages of the Yukon River. Salmon represents an essential part of the culture, diet and economy in our region.

Yukon River Chinook salmon runs have declined dramatically in recent years. Federal fishery disasters have been declared for 2008-2012 for the Yukon. Mean run size of Canadian-origin Chinook salmon declined 45% from the period 1998-2010 compared to the period 1982-1997. No directed commercial fisheries have been permitted for Chinook salmon on the Yukon River for many years, and subsistence has been severely restricted. Amounts necessary for subsistence, as designated by the Alaska Board of Fisheries have not been met on the Yukon for 2008 through 2012. Preliminary estimates suggest that subsistence harvest on the Yukon River in 2012 was roughly half of the historic average harvest. Despite these restrictions, the Canadian escapement goal has only been met in two of the last five years.

The story is similar throughout Western Alaska, with runs on the Kuskokwim at historic low levels and Norton Sound runs in continuing decline. While the causes of these declines are largely unknown, it is clear that Chinook salmon in Western Alaska—and beyond—are in serious trouble. At this point stocks in the Yukon and Kuskowkim are barely replacing themselves, and there are not enough Chinook salmon to meet basic subsistence needs. Both the Board of Fisheries and Alaska Department of Fish and Game have had to restrict subsistence and commercial fisheries to try to meet escapement goals. In the current context of low Chinook salmon abundance we are deeply

concerned about the potential impacts of Chinook salmon bycatch in the Bering Sea pollock fishery on our Chinook salmon stocks. While bycatch has been reduced in recent years from previous levels, the possibility remains that the pollock fleet could catch up to the 60,000 cap permitted under Amendment 91. According to the most recent (2010) genetic stock identification information, as much as 73% of the Chinook salmon taken as bycatch in the Bering Sea pollock fishery are of Western Alaska origin.¹ Preliminary results from 2011, with much improved sampling protocols, indicate a similar stock composition. Under the current Chinook salmon conditions, that amount of bycatch could have significant impacts on Western Alaska stocks. With the low levels of Chinook salmon currently returning to our rivers, a year of bycatch of 60,000 fish would severely impact meeting escapement goals and would cause additional restrictions to in-river fisheries.

To this end the YRDFA Board of Directors passed a resolution regarding salmon bycatch at YRDFA's recent Annual Meeting in St. Mary's. This resolution (attached) specifically **requests that the North Pacific Fishery Management Council take action immediately to reduce the overall bycatch cap to 30,000 and change the pollock fishing season closing date to Sept. 30 to avoid the consistently high bycatch in October.** The resolution further requests that the North Pacific Fishery Management Council also take action to adopt chum salmon bycatch management measures which will adequately protect Western Alaska chum salmon runs.

Thank you for your attention to this issue of great importance to Western Alaska.

Sincerely,



Rebecca Robbins Gisclair

¹ Guthrie, C. M. III, H. T. Nguyen, and J. R. Guyon. 2012. Genetic stock composition analysis of Chinook salmon bycatch samples from the 2010 Bering Sea trawl fisheries. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-232.



YUKON RIVER DRAINAGE FISHERIES ASSOCIATION

725 Christensen Drive, Suite 3-B, Anchorage, Alaska 99501
Tel: 907-272-3141 Fax: 907-272-3142

**Resolution: 2013-02
Salmon Bycatch**

WHEREAS the Yukon River Drainage Fisheries Association (YR DFA) works on behalf of subsistence and commercial fishing families within the Alaskan and Canadian Yukon River drainage who depend on wild salmon for subsistence and commercial fisheries; and

WHEREAS Chinook and chum salmon provide an essential source of food, income and culture for the people of the Yukon River, with chum salmon increasingly important for commercial fisheries and subsistence as Chinook salmon decline; and

WHEREAS subsistence harvests of Chinook salmon have been severely restricted in recent years, and no directed commercial harvests of Chinook salmon have taken place on the Yukon River; and

WHEREAS despite these restrictions the Chinook salmon Canadian escapement goal has only been met in 2 out of the last 5 years and mean run size of Canadian-origin Chinook salmon (which comprise approximately 50% of the run) declined 45% for the period 1998-2010 compared to 1982-1997; and

WHEREAS the Board of Fish has recently taken action to restrict subsistence fishing on the first pulse of Chinook salmon as a conservation measure; and

WHEREAS the Bering Sea pollock fishery catches these same salmon as bycatch; catching over 122,000 wild Chinook salmon in 2007 and over 700,000 chum salmon in 2005; and

WHEREAS according to the best available scientific information half to 70% of the Chinook salmon taken as bycatch are of Western Alaska origin, and of this 40% are from the Yukon River; and

WHEREAS the management measures adopted in April 2009 by the North Pacific Fishery Management Council (the Council) provide for a 47,591 bycatch level in most years, with the potential for the fleet to reach 60,000 in two out of every seven years without consequence; and

WHEREAS although bycatch has remained well below the cap in recent years, the current management regime allows the potential for the pollock fleet to catch as many as 60,000 Chinook salmon as bycatch; and

WHEREAS Chinook salmon bycatch in the pollock fishery is consistently high from October 1 on, and in 2011 over half of the annual bycatch was taken in October and November; and

WHEREAS in these times of severe Chinook salmon declines, all sources of mortality must be reduced and all harvesters of salmon must bear equitably in conserving Chinook salmon; and

WHEREAS there is currently no limit on chum salmon in the Bering Sea pollock fishery in place;

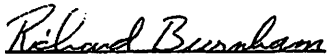
THEREFORE BE IT RESOLVED that YRDFA requests that the North Pacific Fishery Management Council take action immediately to reduce the overall bycatch cap to 30,000 and change the pollock fishing season closing date to Sept. 30 to avoid the consistently high bycatch in October.

BE IT FURTHER RESOLVED that YRDFA requests that the North Pacific Fishery Management Council also take action to adopt chum salmon bycatch management measures which will adequately protect Western Alaska chum salmon runs.

COPIES of this resolution will be sent to the North Pacific Fishery Management Council, National Marine Fisheries Service, Alaska Department of Fish and Game Commissioner, Yukon River Panel, U.S. Fish and Wildlife Service, U.S. Department of State, Bering Sea Fishermen's Association, Association of Village Council Presidents, Tanana Chiefs Conference and other Western Alaska salmon groups.

APPROVED unanimously this 14th day of February 2013 by the Board members and delegates of YRDFA assembled at their Twenty-third Annual Meeting held in St. Mary's, Alaska.

Attest:



Richard Burnham, YRDFA Co-Chair



William Alstrom, YRDFA Co-Chair

**Western Interior Subsistence Regional Advisory Council
c/o U.S. Fish and Wildlife Service
1011 E. Tudor Road, MS 121
Anchorage, AK 99503
Phone: (907) 786-3888, Fax (907) 786-3898
Toll Free: 1-800-478-1456**

RAC WI13018.MH

MAR 26 2013

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

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 Council's support of the model resolution drafted by the Yukon River Drainage Fisheries Association. 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 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, including reducing direct impacts from the Bering Sea commercial fisheries.

We request that the North Pacific Fisheries Management Council take immediate action under agenda item C-6 at its April 1-9, 2013, meeting in Anchorage, to reduce the overall Chinook bycatch cap to 30,000 and change the Pollock fishing season closing date to September 30 to avoid the consistently high bycatch that occurs in October.

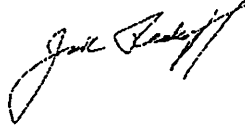
Thank you for the opportunity for this opportunity to provide input to your Council regarding critical issues of concern to our region; we look forward to continued discussions and dialogue. If you have any

Eric Olson

2

questions about this correspondence, please contact me via Melinda Hernandez, Subsistence Council Coordinator with OSM, at (907) 786-3885.

Sincerely,



**Jack Reakoff, Chair
Western Interior Subsistence Regional Advisory Council**

Enclosure:

cc: Kathleen M. O'Reilly-Doyle, Acting Assistant Regional Director, OSM
David Jenkins, Acting Deputy Assistant Regional Director, OSM
Carl Johnson, Council Coordinator Division Supervisor, OSM
Melinda Hernandez, Council Coordinator, OSM
Stephen Fried, Fisheries Division Supervisor, OSM
Federal Subsistence Board
Western Interior Alaska Regional Advisory Council
Becca Robbins Gisclair, Policy Director, YRDFA
Administrative Record

Resolution

Western Interior Alaska Regional Advisory Council

North Pacific Fishery Management Council (NPFMC)

April 1 – 9, 2013

Anchorage, Alaska

U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)

WHEREAS Chinook and chum salmon provide an essential source of food, income and culture for the people in the Western Interior Region, with chum salmon increasingly important for commercial fisheries and subsistence as Chinook salmon decline; and

WHEREAS subsistence harvests of Chinook salmon have been severely restricted in recent years, and no directed commercial harvests of Chinook salmon have taken place on the Yukon River; and

WHEREAS despite these restrictions the Chinook salmon Canadian escapement goal has only been met in 2 out of the last 5 years and mean run size of Canadian-origin Chinook salmon (which comprise approximately 50% of the run) declined 45% for the period 1998-2010 compared to 1982-1997; and

WHEREAS the Board of Fish has recently taken action to restrict subsistence fishing on the first pulse of Chinook salmon as a conservation measure; and

WHEREAS the Bering Sea pollock fishery catches these same salmon as bycatch; catching over 122,000 wild Chinook salmon in 2007 and over 700,000 chum salmon in 2005; and

WHEREAS according to the best available scientific information half to 70% of the Chinook salmon taken as bycatch are of Western Alaska origin, and of this 40% are from the Yukon River; and

WHEREAS the management measures adopted in April 2009 by the North Pacific Fishery Management Council (the Council) provide for a 47,591 bycatch level in most years, with the potential for the fleet to reach 60,000 in two out of every seven years without consequence; and

WHEREAS although bycatch has remained well below the cap in recent years, the current management regime allows the potential for the pollock fleet to catch as many as 60,000 Chinook salmon as bycatch; and

WHEREAS Chinook salmon bycatch in the pollock fishery is consistently high from October 1 on, and in 2011 over half of the annual bycatch was taken in October and November; and

WHEREAS in these times of severe Chinook salmon declines, all sources of mortality must be reduced and all harvesters of salmon must bear equitably in conserving Chinook salmon; and

WHEREAS there is currently no limit on chum salmon in the Bering Sea pollock fishery in place;

THEREFORE BE IT RESOLVED that Yukon River Drainage Fisheries Association (YRDFA) requests that the North Pacific Fishery Management Council take action immediately to reduce the overall bycatch cap to 30,000 and change the pollock fishing season closing date to Sept. 30 to avoid the consistently high bycatch in October.

BE IT FURTHER RESOLVED that YRDFA requests that the North Pacific Fishery Management Council also take action to adopt chum salmon bycatch management measures which will adequately protect Western Alaska chum salmon runs.

**Seward Peninsula Subsistence Regional Advisory Council
c/o U.S. Fish and Wildlife Service
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503
Phone: (907) 786- 3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456**

RAC SP13019.HA

MAR 26 2013

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

Dear Mr. Olson:

I am writing on behalf of the Seward Peninsula Subsistence Regional Advisory Council (Council) to provide the Council's comments and recommendations on chum and Chinook salmon bycatch in the Bering Sea/Aleutian Islands (BSAI) commercial pollock fishery for consideration by the North Pacific Fishery Management Council (NPFMC) under agenda item C-6 at its April 1-9, 2013, meeting in Anchorage, Alaska. The Council unanimously passed a resolution requesting that the NPFMC immediately take action to reduce the overall bycatch cap to 30,000 and change the pollock fishing season closing date to Sept. 30 to avoid the consistently high bycatch in October. The Council further requests that the NPFMC take action to adopt chum salmon bycatch management measures which will adequately protect Western Alaska chum salmon runs.

The Council is one of ten regional advisory 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 Seward Peninsula Alaska region. The Council provides a public forum for discussion and recommendations for subsistence fish and wildlife management in the region. The Council also reviews resource management actions occurring outside the region that may impact subsistence resources critical to communities served by the Council.

The Council held a public meeting on March 20-21, 2013, in Nome and discussed the recent Bering Sea salmon bycatch updates and its support of the enclosed model resolution drafted by the Yukon River Drainage Fisheries Association. Our Council represents subsistence users in the Seward Peninsula and Norton Sound region, some of whom engage in customary and traditional use of salmon resources on the Yukon River. Members of the Council, and the area

Eric Olson

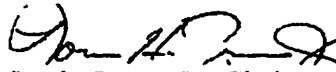
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residents it represents, are deeply concerned about bycatch because Western Alaska chum and Chinook salmon stocks are essential subsistence resources for people in the Norton Sound. Chum salmon contributes significantly to the way of life for Norton Sound subsistence users. Healthy salmon returns are an ecological, cultural, and food security issue of extraordinary importance to the subsistence communities in the Seward Peninsula Region that rely on salmon.

The Council appreciates the opportunity to provide input to the North Pacific Fisheries Management Council on fisheries management issues of concern to the region. We will continue to monitor developments on this important issue and look forward to the results of your efforts to significantly reduce both chum and Chinook salmon bycatch in the BSAI pollock fishery.

If you have any questions regarding this correspondence, please contact Alex Nick, Subsistence Council Coordinator, Office of Subsistence Management (OSM) at (907) 543-1037 or alex_nick@fws.gov.

Sincerely,



Louis Green, Jr., Chair

Enclosure:

cc: Kathleen M. O'Reilly-Doyle, Acting Assistant Regional Director, OSM
David Jenkins, Acting Deputy Assistant Regional Director, OSM
Carl Johnson, Council Coordination Division Supervisor, OSM
Alex Nick, Council Coordinator, OSM
Stephen Fried, Fisheries Division Supervisor, OSM
Donald Rivard, Fisheries Biologist, OSM
Federal Subsistence Board
Seward Peninsula Alaska Subsistence Regional Advisory Council
Becca Robbins Gisclair, Policy Director, Yukon River Drainage Fisheries Association
Administrative Record

Resolution

Seward Peninsula Alaska Regional Advisory Council

North Pacific Fishery Management Council (NPFMC)

April 1 – 9, 2013

Anchorage, Alaska

U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)

WHEREAS Chinook and chum salmon provide an essential source of food, income and culture for the people in the **Norton Sound Region in the Seward Peninsula Subsistence Regional Advisory Council** region, with chum salmon increasingly important for commercial fisheries and subsistence as Chinook salmon decline; and

WHEREAS the subsistence harvests of Chinook salmon have been severely restricted in the Norton Sound/Seward Peninsula region for several years and have affected subsistence fishers in the region; and

WHEREAS there has been only one directed commercial fishing opening for Chinook salmon since 2001 in the Unalakleet and Shaktoolik Subdistricts and the Unalakleet Chinook salmon stock was designated as a stock of yield concern by the Alaska Board of fisheries in 2004 and fisheries surrounding this stock have been modified for conservation purposes; and

WHEREAS subsistence harvests of Chinook salmon have been severely restricted in recent years in the Yukon River, which affects the residents of Stebbins and St. Michael, who have customarily and traditionally fished in the Yukon River, and no directed commercial harvests of Chinook salmon have taken place on the Yukon River; and

WHEREAS despite these restrictions the Chinook salmon Canadian escapement goal has only been met in 2 out of the last 5 years and mean run size of Canadian-origin Chinook salmon (which comprise approximately 50% of the run) declined 45% for the period 1998-2010 compared to 1982-1997; and

WHEREAS the Board of Fish has recently taken action to restrict subsistence fishing on the first pulse of Chinook salmon as a conservation measure; and

WHEREAS the Bering Sea pollock fishery catches these same salmon as bycatch; catching over 122,000 wild Chinook salmon in 2007 and over 700,000 chum salmon in 2005; and

WHEREAS according to the best available scientific information half to 70% of the Chinook salmon taken as bycatch are of Western Alaska origin, and of this 40% are from the Yukon River; and

WHEREAS the management measures adopted in April 2009 by the North Pacific Fishery Management Council (the Council) provide for a 47,591 bycatch level in most years, with the potential for the fleet to reach 60,000 in two out of every seven years without consequence; and

WHEREAS although bycatch has remained well below the cap in recent years, the current management regime allows the potential for the pollock fleet to catch as many as 60,000 Chinook salmon as bycatch; and

WHEREAS Chinook salmon bycatch in the pollock fishery is consistently high from October 1 on, and in 2011 over half of the annual bycatch was taken in October and November; and

WHEREAS in these times of severe Chinook salmon declines, all sources of mortality must be reduced and all harvesters of salmon must bear equitably in conserving Chinook salmon; and

WHEREAS there is currently no limit on chum salmon in the Bering Sea pollock fishery in place;

THEREFORE BE IT RESOLVED that the Seward Peninsula Subsistence Regional Advisory Council requests that the North Pacific Fishery Management Council take action immediately to reduce the overall bycatch cap to 30,000 and change the pollock fishing season closing date to Sept. 30 to avoid the consistently high bycatch in October.

BE IT FURTHER RESOLVED that the Seward Peninsula Subsistence Regional Advisory Council requests that the North Pacific Fishery Management Council also take action to adopt chum salmon bycatch management measures which will adequately protect Western Alaska chum salmon runs.



600 Ericksen Avenue NE
Suite 310
Bainbridge Island, WA 98110

Tel 206.842.3609
www.seashare.org

jharmon@seashare.org

April 1, 2013

Eric Olson, Chairman
North Pacific Fisheries Management Council
605 W 4th Av., Suite 305
Anchorage, AK 99501-2252

RE: Annual report - Prohibited Species Donation Program (PSDP)

Chairman Olson,

I am respectfully submitting the following report on SeaShare's participation in the donation of bycaught salmon and halibut in the BSAI and GOA trawl fisheries.

Background:

SeaShare worked with fishermen, processors, and NMFS to establish the Prohibited Species Donation Program. The first permit was issued to SeaShare (then Northwest Food Strategies) in 1996. SeaShare remains the only organization authorized by NMFS to retain and distribute PSC fish for hunger-relief. To date we have received, processed and donated 2.5 million pounds of fish that would otherwise have been thrown overboard. That's over 10 million servings.

Participants:

Last year SeaShare updated the list of participating boats and plants to include trawl fisheries in the BSAI and GOA. NMFS amended our permit, and allowed us to qualify additional food banks in remote communities. The current list of participants is substantial. In 2012 it included:

- ❖ 122 Fishing boats
- ❖ 18 At-Sea processors
- ❖ 15 Shore Plants
- ❖ 6 Receiving agencies in Alaska
- ❖ 20 + Other companies (cold storage, freight, packaging, etc.)
- ❖ 9 Financial donors (corporations and foundations)

SeaShare will continue to look for other agencies in Alaska (with affordable freight options) to receive and distribute donated seafood.



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Suite 310
Bainbridge Island, WA 98110

Tel 206.842.3609
www.seashare.org

Distribution

As of last year (2012) all PSC fish retained from the BSAI and GOA were used in Alaska.

Thanks to the voluntary financial support of donors like the Rasmuson Foundation, Alaska Marine Lines, Wells Fargo Alaska, all six CDQ groups, and others, we were able to keep all PSC fish - over 100,000 pounds (400,000 servings) - in Alaska.

Industry leaders asked SeaShare two years ago if we could expand our efforts in Alaska. Our goal has always been to distribute donated fish as locally, and as efficiently as possible. Some of the obstacles we needed to overcome in Alaska were:

- Storage limitations
- Intrastate freight
- Varying quality
- Qualified Receiving agencies (food banks and feeding centers)

Voluntary Participation

Every person, company, and association that we work with has committed to helping us feed hungry Americans. Because many food bank clients are not sophisticated seafood consumers, we have to ensure high quality throughout the donation chain. Voluntary retention is an important aspect of the Prohibited Species Donation Program, because it promotes high Initial quality. Not all fish can be used. Some have to be discarded, or heavily trimmed to salvage wholesome meat. The downstream processing can cost as much as 60 cents per pound. Historically, receiving food banks in the lower 48 have reimbursed SeaShare for a portion of that cost. As of last year, generous foundations and corporations in Alaska, including WACDA, have enabled us to distribute all PSC fish in Alaska at 0 cost to the receiving agencies.

Other details

1. All participants are encouraged to throw back any bycatch that might survive, as well as any fish that are not wholesome or suitable for processing.
2. Each plant has different capabilities and limitations. At a minimum, all processors agree to H&G, freeze, and pack the fish.
3. Some volume can be distributed in Alaska in H&G form, minimizing costs.
4. SeaShare receives no compensation from NMFS or other stakeholders for re-processing, storing and shipping.
5. SeaShare maintains traceability throughout the entire PSD program. NMFS approves our record-keeping methods, and retains the right to review/inspect at any time.
6. SeaShare does not record salmon by species (chum vs. chinook), or by number of fish.

SEASHARE



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Tel 206.842.3609
www.seashare.org

Reclaiming fish that were being thrown overboard was our original goal, and it remains an important program - one that highlights the respect that fishermen and other stakeholders have for the resource. Over the last 20 years we've tailored other programs across the country, resulting in a combined effort that is now one of the largest sources of protein to the food bank network.

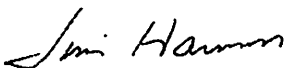
1,533,000 pounds of seafood were donated to 48 food banks in 25 states last year, including:
606,211 pounds distributed in the Pacific Northwest (WA, OR, AK)
211,827 pounds distributed in Alaska alone.

Alaska benefits from other donations as well:

- Canned salmon
- Frozen Salmon fillets
- Frozen breaded Pollock portions (Pollock donated by the At-Sea Processors Assoc.)
- Misc. frozen items

One example is the 1200 pounds of king salmon fillets donated to the Glory Hole in Juneau last month. These weren't from PSC fish. They were first run product, donated by an Alaska seafood company. In addition, the Food Bank of Alaska sends our donations out to smaller food banks and feeding centers across the state. And many seafood companies donate food regularly in their communities.

SeaShare will continue recruiting processors, freight companies, food banks, and financial donors so that more seafood reaches more communities in Alaska. We are now working on donations for Dutch Harbor, Kotzebue/Nome, and Ketchikan. Please distribute this report as appropriate, and contact us if we can answer any questions regarding developments of the Prohibited Species Donation Program. Respectfully,

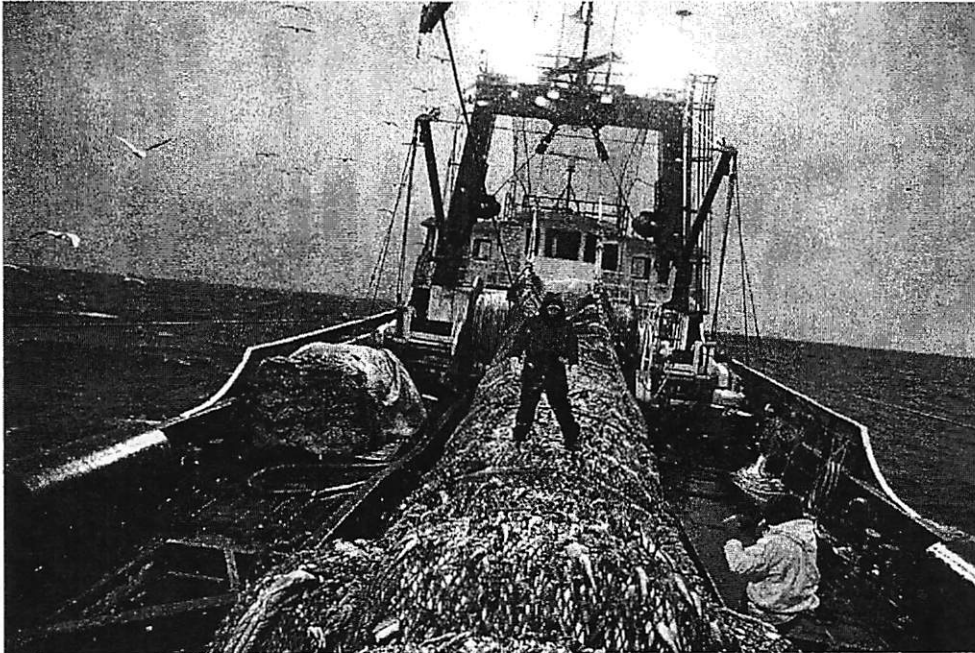


Jim Harmon,
Executive Director

Attachments: photos

SEASHARE

600 Ericksen Avenue NE
Suite 310
Bainbridge Island, WA 98110



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share.org

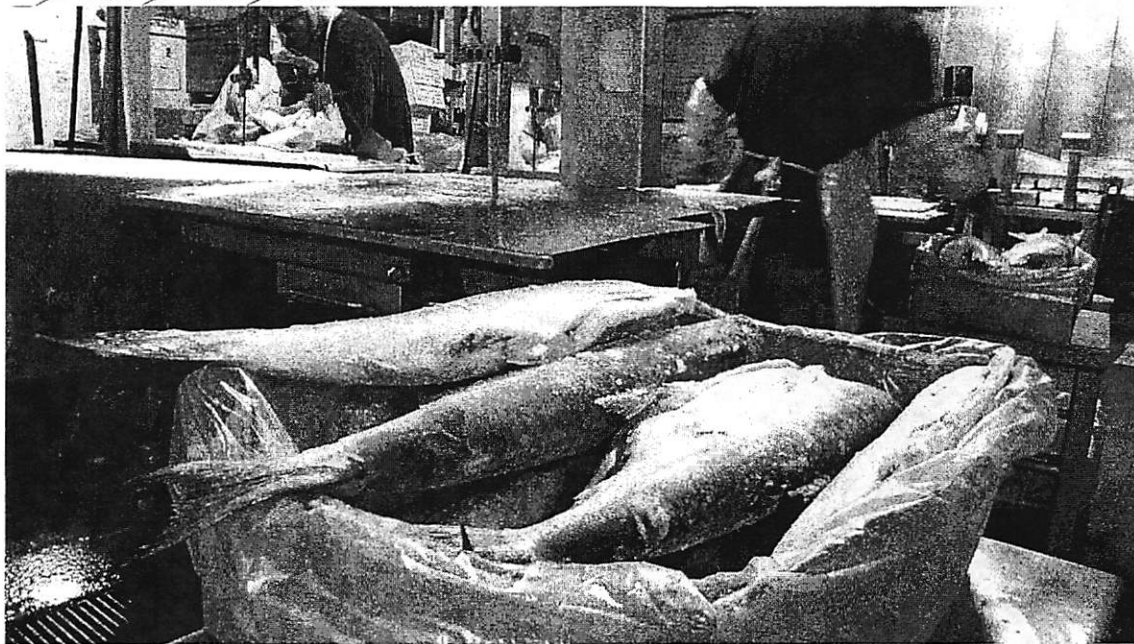
A Codend of pollock



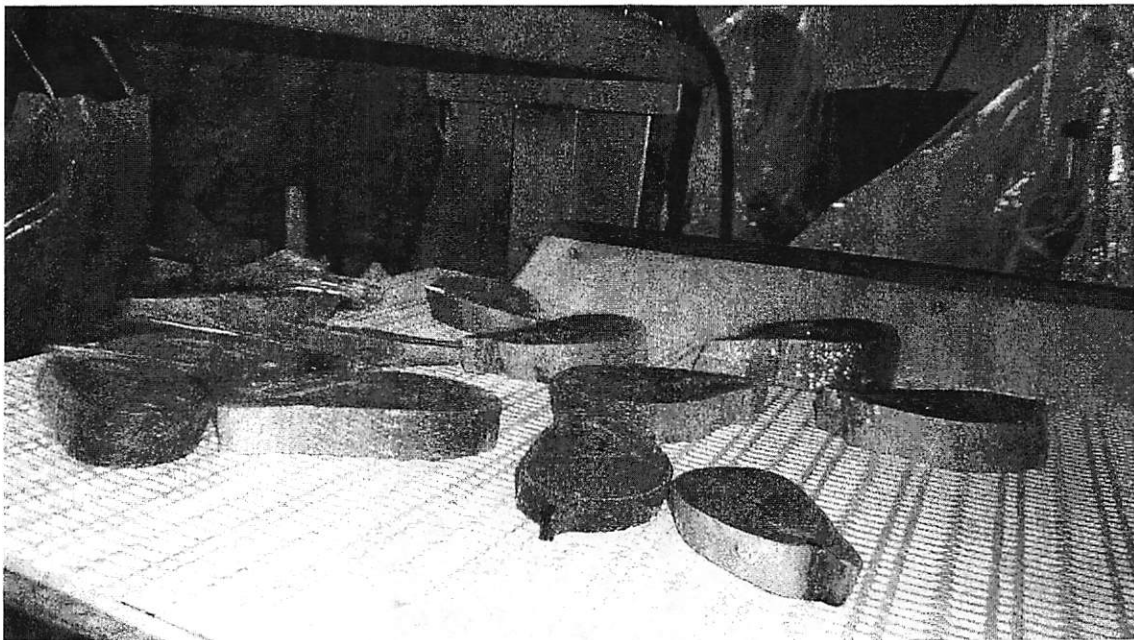
CVRF board inspecting salmon from their boat

SEASHARE

600 Ericksen Avenue NE
Suite 310
Bainbridge Island, WA 98110



Incoming salmon

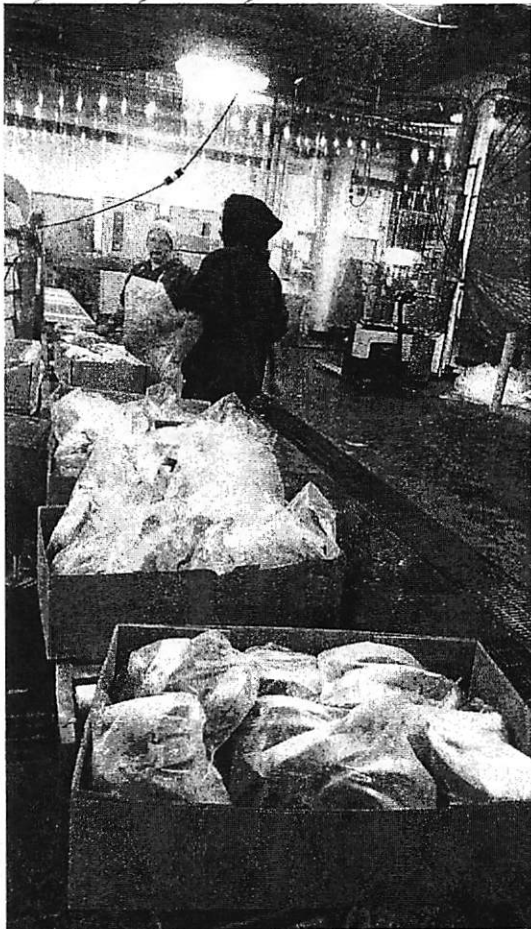


Steaking and trimming

SEASHARE

600 Ericksen Avenue NE
Suite 310
Bainbridge Island, WA 98110

Tel 206.842.3609
www.seashare.org



2.5 lbs. per bag, 40lbs. per case



Serving at Bean's Café, March 2012



600 Ericksen Avenue NE
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Bainbridge Island, WA 98110

AGENDA C-6(d)
Supplemental
APRIL 2013

1 April 2013

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Sarah Ellgen
Fishery Management Specialist
NOAA Fisheries, Sustainable Fisheries
PO Box 21668
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RE: Annual summary, Prohibited Species Donation Program

Dear Sarah,

I am writing today to confirm the changes that SeaShare proposed last year. We appreciate the support that NMFS has provided, and I hope the results meet with your approval.

1. Expanded list of participants

SeaShare can confirm that more boats and plants are now authorized to retain PSC Chinook salmon, Chum salmon, and Halibut for donation. The total list for the BSAI and GOA includes:

- 15 Shore plants
- 18 At-Sea Processors
- 122 Fishing boats

2. Expanded list of qualified food banks

SeaShare worked last year to approve additional food banks and feeding centers that can receive PSC in Alaska. The list now includes:

- Kodiak Food Bank
- Food Bank of Alaska
- Bean's Café
- Brother Francis Shelter
- St. Paul Food Bank

The original permit required distribution through the national food bank Network of Feeding America. These 200+ agencies have the record-keeping and safe handling requirements needed to safely and efficiently distribute our seafood. The Food Bank of Alaska in Anchorage is the only affiliate in Alaska. With NMFS approval we qualified, then added specific agencies in Alaska to receive more of our donated PSC. SeaShare will continue to look for other agencies (with affordable freight options) to receive our seafood.



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3. 20+ Additional donors

The boats and plants donate their time and effort to retain, clean, and freeze PSC fish for donation. SeaShare collects those frozen, H&G fish in Kodiak and Dutch Harbor. We then work to enroll other companies to store, re-process and distribute the fish to hungry Americans. Last year SeaShare recruited over 20 service companies to help turn H&G fish into family-sized portions and send them out.

4. New Financial support

The total cost to process and distribute PSC fish has increased over the last 19 years. Despite the generous support of many companies, it can cost up to 60 cents per pound to complete the process. In the past SeaShare has relied on the receiving food banks to reimburse for at least a portion of that cost. Two years ago, at the request of fishermen and processors, SeaShare sought financial support from the philanthropic community within Alaska; so that more fish could be donated in communities where seafood has strong cultural and dietary significance. We are proud to report a growing response to this initiative. And in 2012 the CDQ groups, collectively known as WACDA, volunteered to reimburse our costs if SeaShare could distribute all PSC fish in Alaska.

Summary - results in Alaska

SeaShare proposed last year that we distribute more PSC fish in Alaska. Within one year we were able to reach that goal. Thanks to the support of NMFS, fishermen, processors and other stakeholders, and with the voluntary financial support of the six CDQ groups, all of the fish generated in 2012 through the Prohibited Species Donation Program were distributed in Alaska.* That's over 100,000 pounds of valuable fish that fed hungry Alaskans.

SeaShare will continue working to expand the list of processors, freight companies, and food banks so that more seafood reaches more communities in Alaska. Please forward this update as appropriate, and contact us if we can answer any questions regarding the developments of our Prohibited Species Donation Program.

Sincerely,

Jim Harmon,
Executive Director

cc: SeaShare Board of Directors

* a small portion is still being held in inventory (Kodiak and Dutch Harbor), pending distribution.