

**The following are attached as a PDF**

**James Kearns**

Alaska Halibut Forever  
1/31/2018 9:14:46 PM

Attachments: [NPFMC letter for Feb 2018.docx](#)

**Tom Panamaroff**

Koniag, Inc.  
2/2/2018 2:35:37 PM

Support letter for appointment of Denise May to the Charter Halibut Management Committee.

Attachments: [Koniag support D. May to NPFMC.pdf](#)

**Ernie Weiss**

Aleutians East Borough  
1/9/2018 10:37:04 AM

Please find attached Aleutians East Borough Resolution 18-20 supporting a 58 ft limit and lower trip limits for the WGOA pollock fishery. We hope the NPFMC will prioritize the 'WGOA pollock vessel limitations discussion paper' for consideration sometime in 2018. Thanks for the opportunity to comment.

Attachments: [RES 18-20 supporting 58' vessel size limit in WGOA Pollock.pdf](#)

**Nunakauyak Traditional Council**

City of Tooksook Bay  
1/31/2018 5:59:21 PM

Attached Joint Resolution 2017-12-001

Attachments: [E Public Comment City of Toksook Bay.pdf](#)

**Herman Nelson Sr.**

Koliganek Village Council  
1/31/2018 6:01:26 PM

Via Mail

Attachments: [E\\_KoliganekVillage.pdf](#)

**Paul Clampitt**

F/V Augustine  
1/31/2018 6:03:58 PM

Via mail

Attachments: [IFQ proposals-PaulClampitt.PDF](#)

**Yvonne Mullan**

Native Village of Port Lions  
2/2/2018 9:56:32 AM

Attached is a letter of support for Denise May to serve on the Charter Halibut Management Committee. Thank you.

Attachments: [DOC001.pdf](#)

February 1, 2018

North Pacific Fishery Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, AK 99501

Dear Chairman Hull and Council members:

**Re: Appointment of Denise May to serve on the Charter Halibut Management Committee**

The Kodiak Archipelago Rural Regional Leadership Forum (forum) is a consortium of about sixty-five (65) tribal, municipal, Alaska native corporation and community leaders who support the coastal communities of Akhiok, Old Harbor, Karluk, Larsen Bay, Ouzinkie and Port Lions. The forum meets three times a year in Kodiak to discuss a broad range of subjects from a remote, rural community perspective. Fisheries are a standing topic of interest to forum participants and time is set aside at each meeting to discuss state and federal policy actions that may impact the represented rural communities. Fisheries and access to marine resources have always been a foundational resource for our island communities as we rely on strong fisheries and resident fishermen to thrive.

The forum supports the addition of a rural community representative to serve on the Halibut Charter Management Committee to expand the committee make-up to provide input from Alaska's smaller coastal communities. The forum appreciates the call for interested individuals and we are writing to support the appointment of Denise May. Denise has an over twenty-year history of community advocacy that includes extensive service on councils and boards at both the local, regional and statewide level. In her home community of Port Lions (and Afognak) she currently serves as the Native Village of Port Lions Tribal Council President, sits on the Port Lions Fisheries Board (the community quota entity for Port Lions) and has served many years on the board of Afognak Native Corporation, including six years as its Chairman. She has also served on the Alaska Federation of Natives Board as the village representative from the Koniag region. Denise is highly conversant with the issues facing small charter operators not only through her support and participation in numerous fisheries forums but also as an owner-operator with her husband Bob of a sport fishing charter and lodge business located in Port Lions.

We strongly encourage the North Pacific Fishery Management Council to appoint Denise to the Halibut Charter Committee.

Respectfully,



Yvonne Mullan  
Tribal Administrator



North Pacific Fishery Management Council

605 West 4th, Suite 306

Anchorage, Alaska 99501-2252

12/11/2018

To who it my concern,  
Attached are two proposals for regulation changes to the fixed gear sablefish fishery managed by the NPFMC. I'm submitting these proposals for immediate consideration. I would also like these proposals submitted to the IFQ committee chaired by council member Buck Laukitis.

Thank You, Paul Clampitt

F/V Augustine

7721 168TH PL SW

Edmonds, WA 9802206-618-3991

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL  
Fishery Management Plan Amendment Proposal

Date: 12/5/2017

Name of Proposer: Paul Clampitt

Address: 7721 168th PL SW  
Edmonds, WA 98026  
Telephone: 206-618-3991

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Fishery: Pot Sablefish

Brief Statement of Proposal: (Provide a single, brief paragraph concisely describing the action to be taken. Details should be specified on additional sheets.)

Make all pot sablefish regulations uniform throughout the Gulf of Alaska.  
Remove pot configuration regulations as originally intended by the NPFMC.  
300 pot limits, 7 days allowed before tending to a pot. Allow gear sharing between vessels.

Objectives of Proposal: (What is the problem? Begin with a concise statement of the problem to be solved by the proposal. Attach sheets as necessary to fully describe the problem, and the implementation to American fisheries if the problem is not resolved.)

The NPFMC originally stated that they were not going to regulate pot configuration but the NMFS put in specific regulations concerning the size of entrance tunnels and escape rings. The pot configuration regulations hampers innovation making it difficult to increase efficiency.

The 120-pot limit in west Yakutat and SE Alaska makes it difficult to cover enough ground to locate fish concentrations or haul efficiently. 120 pots can be hauled in as little as 12 hr. The pots need to soak for a minimum of 36 hrs., this leaves the vessel idle spending too much time and resources waiting for gear to soak. With 300 pots no more than 9 miles of ground will be taken up which isn't any more ground than a larger longliner.

The onerous regulations in west Yakutat and S.E. Alaska mostly harm smaller vessels making it difficult for them to convert to pots. Allowing them to share gear and leave the gear on the grounds for 7 days not only makes the switch to pots more affordable but also safer.

Need and Justification for Council Action: (Briefly explain why action by the Council is necessary to address and solve the problem. Is there any other way the problem can be resolved?)

The whale predation problem isn't going away and if anything, it is intensifying. The NPFMC needs to encourage and incentivize the switch to pot gear as soon as possible in order to conserve one of the most valuable fisheries.

Foreseeable Impacts of Proposal: (Who wins, who loses? Briefly outline the effects you think the proposed amendment will have, not only in solving the problem but also to other sectors of the fishery.

Everyone wins by loosening up the restrictions on pot gear. Pot fishing vessels will be more efficient and thus get off crowded grounds quicker. Small vessels will be able to pool their resources and make the switch to pots. There will be less fish wasted to whale depredation. Whales can return to their natural behavior.

Are there Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?

I don't see an alternative to pots in stopping the serious problem of whale depredation. Pots have been used throughout the North Pacific successfully. Our vessel the Augustine used pots successfully in Alaska this year without gear conflict and we did not feed a whale. These regulation changes would make our operation much more efficient and would encourage more vessels to switch to pots. The sooner the fleet moves to pots the better.

Supportive Data & Other Information: What data are available and where can they be found?  
Data is available from the observer program.

NORTH PACIFIC FISHERY MANAGEMENT COUNCIL  
Fishery Management Plan Amendment Proposal

Date: 12/5/2017

Name of Proposer: Paul Clampitt

Address: 7721 168th PL SW  
Edmonds, WA 98026  
Telephone: 206-618-3991

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Fishery: Fixed Gear Sablefish

Brief Statement of Proposal: (Provide a single, brief paragraph concisely describing the action to be taken. Details should be specified on additional sheets.)

Allow vessels using fixed gear to discard sablefish.

Objectives of Proposal: (What is the problem? Begin with a concise statement of the problem to be solved by the proposal. Attach sheets as necessary to fully describe the problem, and the implementation to American fisheries if the problem is not resolved.)

The 2014 year class is the largest in history and is moving into the fishery. It makes no sense to harvest these fish before they have spawned, put on weight and add to the production of the fishery.

Need and Justification for Council Action: (Briefly explain why action by the Council is necessary to address and solve the problem. Is there any other way the problem can be resolved?)

Studies have show that sablefish have a low discard mortality in fixed gear fisheries. Pots will catch smaller sablefish which won't bite on baited hooks. In order to allow these fish to grow up and add to the production of the fishery by increasing their yield and spawning the council needs to change the regulations in the sablefish IFQ fixed gear fishery to allow for discarding.

For many years the minimum size for sablefish retention for the sablefish fishery managed by the PFMC was 22in. for the reasons detailed in the study referenced at the end of this application.

Foreseeable Impacts of Proposal: (Who wins, who loses? Briefly outline the effects you think the proposed amendment will have, not only in solving the problem but also to other sectors of the fishery.

There are no losers by allowing discarding. We will increase the yield in the fishery. Discards are required in the halibut fishery so there is precedent for allowing discards already. Tagging studies have shown that there is a high survivability in sablefish discards. Pot caught sablefish are handled less than longline caught fish and suffer no hook injuries so their survivability should be even greater.

Are there Alternative Solutions? If so, what are they and why do you consider your proposal the best way of solving the problem?

There are no other solutions.

Supportive Data & Other Information: What data are available and where can they be found?

Estimation of discard mortality of sablefish (*Anoplopoma fimbria*) in Alaska longline fisheries  
Megan M. Stachura<sup>1,2</sup> Chris R. Lunsford (contact author)<sup>1</sup> Cara J. Rodgveller<sup>1</sup> Jonathan Heifetz<sup>1</sup> Email  
address for contact author: [chris.lunsford@noaa.gov](mailto:chris.lunsford@noaa.gov) <sup>1</sup> Auke Bay Laboratories Ted Stevens Marine  
Research Institute Alaska Fisheries Science Center National Marine Fisheries Service National Oceanic  
and Atmospheric Administration 17109 Pt. Lena Loop Rd. Juneau, Alaska 99801 <sup>2</sup> Present address:  
School of Aquatic and Fishery Sciences University of Washington Box 355020 Seattle, Washington  
98195

December 7, 2017

North Pacific Fishery Management Council  
605 W 4<sup>th</sup> Ave  
Anchorage, Alaska 99501

RECEIVED  
DEC 14 2017

New Koliganek Village Council  
Herman F. Nelson Sr.  
P.O. Box 5057  
Koliganek, Alaska 99576

Re: CDQ Program

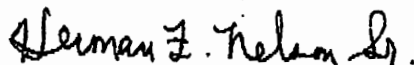
To whom this may concern:

I am writing a letter to the Board of Directors and our Senators in Washington D.C. to expand the CDQ Program, 100 miles inland so inland villages can benefit off of the CDQ Program.

Again, when first started we supported and was part of the process to receive CDQ Funding.

Lisa Murkowski, Dan Sullivan and Don Young please expand the CDQ Program as our inland villages can benefit off of the CDQ Dollars.

Sincerely,



Herman F. Nelson Sr.  
New Koliganek Village Council President



**JOINT RESOLUTION NO. 2017-12-001**

**JOINT COMMUNITY RESOLUTION**  
Nunakauyak Traditional Council  
City of Toksook Bay

We, the undersigned representatives of the Community members of Toksook Bay, a member of Coastal Village Fund (CVRF), a Community Development Quota, (CDQ) group established by Congress for the benefit of Community Members of Toksook Bay to allow for and participate in the harvest of marine fisheries resources pass this resolution on behalf of our community members;

**Whereas**, CVRF was established to allow for and participation of our village members to harvest marine fisheries resources under the CDQ, resources such as salmon, halibut, herring and other commercial marine fisheries resources, and;

**Whereas**, CVRF management and board have not allowed the harvest of marine fisheries resources for member villages of Platinum, Goodnews Bay, Quinhagak, Eek, Tuntutuliak, Kongiganak, Kwillinghok, Kipnuk, Cheforak, Umkumiut, Toksook Bay, Tununak, Mekoryuk, Newtok, Chevak, Hooper Bay, Paimiut and Scammon Bay, a total of eighteen member villages located in the coastal area for a number of years, and;

**Whereas**, CVRF management and board have stated that they are not allowing the villages to participate due to high costs, however, it is affecting the welfare of member villages due to lack of fisheries in paying basic needs such as electricity, heating and fuel for hunting and fishing, water and sewer and impacting operations of local villages stores that provides basic needs and merchandise, and;

**Whereas**, Mekoryuk representatives have testified before the North Pacific Fisheries Management Council (NPFMC) asking for a halibut quota that was leased by CVRF and board to another harvester, and;

**Whereas**, this action of CVRF management and board, by leasing CVRF allocation to another harvester is depriving CVRF members from direct participation and has lowered the quality of life that is in compliance of the CDQ purpose, and;

**NOW THEREFORE BE IT RESOLVED**, that the above organizations, representing members of the Community of Toksook Bay reinstitute the purposes of CDQ and allow for fisheries of marine fisheries resources for the benefit of its membership, and;

**BE IT FURTHER RESOLVED**, that the CVRF representative convey this resolution to the CVRF board and management, and;

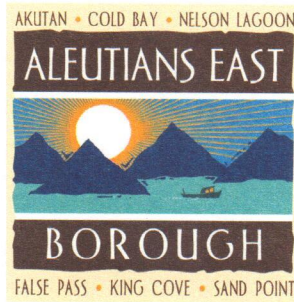
**BE IT FURTHER RESOLVED**, that this resolution be forwarded to all CVRF member villages and community organization, North Pacific Fisheries Management Council, Congressman Don Young, US Senators Lisa Murkowski and Dan Sullivan and to the State of Alaska, Governor's Office and to our State Legislators representing our respective villages.

### CERTIFICATION

This resolution was adopted by the Nunakauyak Traditional Council and City of Toksook Bay at the duly called joint meeting of the tribal and city council by a vote of 13 yes and \_\_\_ nays and \_\_\_ abstaining on December 20, 2017

  
\_\_\_\_\_  
Nunakauyak Traditional Council, President

  
\_\_\_\_\_  
City of Toksook Bay, Mayor



**RESOLUTION 18-20**

**A RESOLUTION OF THE ALEUTIANS EAST BOROUGH ASSEMBLY SUPPORTING  
58 FOOT VESSEL SIZE LIMIT IN THE WESTERN GULF OF ALASKA POLLOCK  
TRAWL FISHERY AND LOWERING TRIP LIMITS.**

**WHEREAS**, 58 foot and under vessels are the hallmark of the local King Cove and Sand Point based vessels that participate in the Western Gulf of Alaska (WGOA) Pollock trawl fishery, and


**WHEREAS**, those communities and the AEB are socio-economically dependent on the local Pollock fishery, and

**WHEREAS**, larger non local vessels are taking an increasingly larger percentage of the Pollock quota in recent years, and


**WHEREAS**, the NPFMC has initiated discussion papers recently to consider 1) lowering the WGOA Pollock trip limit from 300,000 to 200,000, and 2) implementing a 58 foot vessel length overall size limit in the WGOA Pollock fishery.

**NOW THEREFORE BE IT RESOLVED**, the Aleutians East Borough Assembly supports action by the NPFMC to implement lower trip limits and a 58 foot length overall vessel size limit in the WGOA Pollock fishery.

PASSED AND ADOPTED by the Aleutians East Borough on this 14<sup>th</sup> day of December, 2017.

  
Alvin D. Osterback, Mayor

ATTEST:

  
Tina Anderson, Clerk



February 2, 2018

North Pacific Fishery Management Council  
605 West 4th Avenue, Suite 306  
Anchorage, AK 99501

**Re: Appointment of Denise May to serve on the Charter Halibut Management Committee**

Dear Chairman Hull and Council members:

Koniag, Inc. is one of the twelve regional Alaska Native Corporations formed under the terms of the Alaska Native Claims Settlement Act of 1971. Koniag, Inc. has approximately 3,900 Alutiiq Shareholders. Our region encompasses the Kodiak Archipelago in the Gulf of Alaska and a portion of the Alaska Peninsula. In addition to the hub community of Kodiak, there are six fishery dependent rural communities within our region. Many of the residents in these communities are commercial, subsistence, sport and/or sport charter fishermen as well Koniag, Inc. Shareholders. In recent years the Koniag, Inc. board of directors prioritized helping to protect fishery access and maintaining a fisheries economic base for our Shareholders and Shareholder communities in the region.

Koniag, Inc. appreciates the NPFMC's addition of a rural community representative to serve on the Halibut Charter Management Committee to expand the committee make-up to provide input from Alaska's smaller coastal communities. It has come to Koniag, Inc.'s attention that Denise May has applied to serve on the NPFMC's Charter Halibut Management Committee. Koniag, Inc. supports the appointment of Denise to this committee.

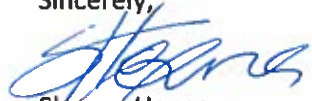
Denise has an over twenty-year history of community advocacy that includes extensive service on councils and boards at both the local, regional and statewide level. In her home community of Port Lions, she currently serves as the Native Village of Port Lions Tribal Council President, sits on the Port Lions Fisheries board (the Community Quota Entity for Port Lions) and has served many years on the board of directors of Afognak Native Corporation, including six years as its chair. She has also served on the Alaska Federation of Natives board of directors as the village representative from the Koniag region. Denise is highly conversant with the issues facing small charter operators not only through her support and participation in numerous fisheries forums but also as an owner-operator with her husband Bob of a remote sport fishing charter and lodge business located near Port Lions.

194 Alimaq Drive  
Kodiak, AK 99615  
(907) 486-2530  
Fax (907) 486-3325

Chairman Dan Hull, NPFMC  
February 2, 2018  
Page 2

Given her background, experience and willingness to serve, Koniag, Inc. strongly encourages you to appoint Denise May to the NPFMC's Charter Halibut Management Committee. Please feel free to contact Koniag's Regional and Legislative Affairs Executive, Tom Panamaroff at (907) 261-4011 or [tpanamaroff@koniag.com](mailto:tpanamaroff@koniag.com) should you have any questions or require additional information.

Sincerely,



Shauna Hegna  
President

194 Alimaq Drive  
Kodiak, AK 99615  
(907) 486-2530  
Fax (907) 486-3325

**James Kearns**

Alaska Halibut Forever

1/31/2018 9:14:46 PM

Comments for the NPFMC, the Charter Halibut Management Committee, and the Halibut Management Committee

I have been in business as a charterboat operator in the Icy Straits, Cross Sound, and Glacier Bay areas of 2C since 1970. Recently I attended the January IPHC 2018 meetings in Portland and in that meeting I proposed a change in the recreational regulations. I proposed a recreational only halibut allocation that is separate from that allocated to the commercial fishing industry. I noted that it would require the un-guided recreational fishery to comply with the same rules and limits as the guided recreational anglers. That way all recreational fishermen would be helping to maintain and manage the halibut resource. I also recommended that there be a one fish, any size, per day bag limit for all recreational fishermen and that if further regulation is required to stay within a recreational fishing only allocation, then annual limits and early or regular closures be implemented. Additionally, I recommended a punch card or a stamp that would have to be turned in or reported so that there could be an accurate method of accounting for the recreational harvest. There was positive discussion in the Conference boards and among the commissioners, however they said that the NPFMC was the proper agency to recommend such changes. Therefore, I am submitting this to you. Hopefully it will be considered along with the letter from the IPHC staff.

I made this proposal because what really affects my business is not the allocation restrictions including bag limits and size limits, but rather the inequity caused by the difference in regulations between guided and unguided recreational fishermen. So I would really like to see you address a change in policy that would remove charterboat sport/recreational fishing anglers from any kind of catch sharing plan with commercial fishermen. And then put them, and all other sports/recreational fishermen, in a separate allocation that fits into the halibut abundance picture, so that bag limits and size limits are the same for all sports/recreational fishermen. Additionally, a halibut stamp or tag for all sports fishermen should be implemented to give a more accurate count of the number of fish that are harvested.

As a council, you have considered an RQE program and you have already implemented a GAF program. Both of these are designed to move some of the commercial quota into the hands of recreational fishermen. Noting that the scientific report at the IPHC meetings estimated the West Coast recreational fishery at 20% of the TCEY, there may not need to be any such programs.

I see no need for a guided recreational angler to have a one fish bonus. This is, after all, a recreational fishery. All recreational fishermen should shoulder an equal responsibility for the health of the resource.

Aside from the health of the resource and the idea that all recreational fishermen(guided or un-guided) should have an equal responsibility to insure that resource, another important issue is that charterboat operators and businesses are not commercial fishing entities. They are actually just coast guard licensed taxi drivers, therefore the recreational fishermen whom they transport are not commercial fishermen and thus they should not be put in a commercial fishing allocation. Now don't get me wrong, I am delighted that this process we have gone through has limited the number of charterboat operators or businesses by putting them in a limited entry program, ie the charter halibut permit program. It is great. It reduces the competition for all of us and I truly appreciate the asset I received that is worth about \$40,000 dollars. But the recreational fishermen who go on mine and every other operator's boats are not commercial fishermen. In fact, it is against the law for them to sell their fish. So put them, and all other recreational fishermen, in a separate allocation group for all recreational fishermen and then they can be a separate group and accountable to their portion of the whole abundance based pie. Then we don't need RQE, GAF, CSP, or the associated regulations. All sport fishing(guided or not) for halibut in Alaska should have its own allocation of the halibut abundance pie, like Canada already does, and the management regulations, whatever is necessary, should be the same for all sports fishermen.