



Kodiak Island Borough

Office of the Borough Mayor

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May 22, 2015

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

RE: Chinook salmon PSC closure for the GOA CV non-pollock non-rockfish trawl sector

Dear Mr. Hull,

We respectfully request that National Oceans and Atmospheric Administration (NOAA) work with the Secretary of Commerce to promulgate emergency regulations that would make additional Chinook salmon available to the non-pollock non-rockfish GOA catcher vessel fisheries so that these fisheries can be open for the remainder of 2015. The proposed action to allocate additional Chinook salmon to the fishery is a reasonable response to a circumstance where inaction will result in substantial and irrevocable harm to these fisheries and the community of Kodiak.

The GOA non-pollock non-rockfish CV sector fisheries closed on May 3 due to the newly implemented regulation, Amendment 97, which imposes a 2,700 Chinook salmon hard cap on these fisheries. According to the EA/RIR/IRFA for the Chinook Salmon Prohibited Species Catch in the GOA non-pollock trawl fisheries that supported the decision implementing this limit, "the impact of the earliest closure (mid-April) to the CV sector is estimated to be 22,000 metric tons of harvest, \$28.5 million in first wholesale revenue" ¹

The only community to be affected by the present closure is the community of Kodiak, since the Kodiak fleet is the only non-pollock trawl catcher vessel fleet that operates after May in the Gulf of Alaska. While the extent of the economic loss of the closure is yet to be quantified, it may be substantially greater than projected by Council analysis. The only consideration in the analyst's estimate is the harvester's and processor's loss. The reduction in landings and associated processing labor hours has immediately impacted our community. The economic base of Kodiak is largely dependent on fishery support industries, including local water, sewer, and electric utilities, fuel suppliers, shippers, vessel maintenance facilities, and harbor facilities. These consequences of this action may resonate throughout our community as the economic losses spread throughout the workforce and support industries.

The near year-round operation of the trawl fleet fills critical gaps in economic activity that arise because of the seasonality of other fisheries, such as the salmon, fixed gear groundfish and herring fisheries. The activity generated by the trawl fleet allows the

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community to support the largest residential processing workforce in Alaska. This segment of the population is vital to the social and cultural fabric of our community as multi-generational residential workers are thoroughly integrated in every aspect of life in Kodiak. Clearly, the losses to Kodiak from the closure will be substantial and irrevocable. The social repercussions of these types of losses are extremely detrimental to a community and its residents.

We propose two responses to this trawl closure. First, we request that the Council immediately task its staff with the development of a discussion paper to examine this issue. The paper should examine the breadth and scope of effects of the closure on the Kodiak-based trawl fishery, dependent industries, and the Kodiak community.

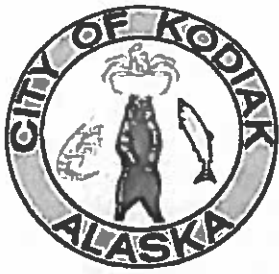
Second, we ask that the Council move forward with the development of a GOA trawl bycatch management program that is presently scheduled for the Council's October meeting. That action is critical to allowing fishery participants to achieve the Council's bycatch management objectives while maintaining balanced and sustainable fisheries and healthy harvesting and processing sectors. We encourage timely Council progress in advancing a cooperative management program to provide tools for the fleet to address bycatch restrictions.

Sincerely,
OFFICE OF THE MAYOR



Jerrol Friend
Borough Mayor

Cc: Commissioner Sam Cotten
Senator Lisa Murkowski
Senator Dan Sullivan
Representative Don Young
Governor Bill Walker
Lt. Governor Byron Mallott
Senator Gary Stevens
Representative Louise Stutes



Office of the Mayor and Council
710 Mill Bay Road, Room 216, Kodiak, Alaska 99615

May 26, 2015

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

RE: Chinook salmon PSC closure for the GOA CV non-pollock non-rockfish trawl sector

Dear Mr. Hull:

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The GOA non-pollock non-rockfish CV sector fisheries closed on May 3 due to the newly implemented regulation, Amendment 97, which imposes a 2,700 Chinook salmon hard cap on these fisheries. According to the EA/RIR/IRFA for the Chinook Salmon Prohibited Species Catch in the GOA non-pollock trawl fisheries that supported the decision implementing this limit, "the impact of the earliest closure (mid-April) to the CV sector is estimated to be 22,000 metric tons of harvest, \$28.5 million in first wholesale revenue"¹

The only community to be affected by the present closure is the community of Kodiak, since the Kodiak fleet is the only non-pollock trawl catcher vessel fleet that operates after May in the Gulf of Alaska. While the extent of the economic loss of the closure is yet to be quantified, it will be substantially greater than projected by Council analysis. The only consideration in the analyst's estimate is the harvester's and processor's loss. The reduction in landings and associated processing labor hours has immediately impacted our community. The economic base of Kodiak is largely dependent on fishery support industries, including local water, sewer, and electric utilities, fuel suppliers, shippers, vessel maintenance facilities, and harbor facilities. These consequences of this action will resonate throughout our community as the economic losses spread throughout the workforce and support industries.

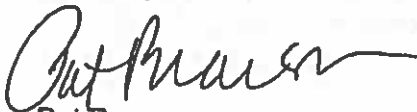
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The near year-round operation of the trawl fleet fills critical gaps in economic activity that arise because of the seasonality of other fisheries, such as the salmon, fixed gear groundfish and herring fisheries. The activity generated by the trawl fleet allows the community to support the largest residential processing workforce in Alaska. This segment of the population is vital to the social and cultural fabric of our community as multi-generational residential workers are thoroughly integrated in every aspect of life in Kodiak. Clearly, the losses to Kodiak from the closure will be substantial and irrevocable. The social repercussions of these types of losses are extremely detrimental to a community and its residents.

We propose two additional responses to this trawl closure. First, we request that the Council immediately task its staff with the development of a discussion paper to examine this issue. The paper should first explore whether the foundation of the Council's action (i.e., the protection of Alaska salmon stocks) is a reasonable basis for the limit. The paper should also examine the breadth and scope of effects of the closure on the Kodiak-based trawl fishery, dependent industries, and the Kodiak community.

Second, we ask that the Council move forward with the development of a GOA trawl bycatch management program that is presently scheduled for the Council's October meeting. That action is critical to allowing fishery participants to achieve the Council's bycatch management objectives while maintaining balanced and sustainable fisheries and healthy harvesting and processing sectors. We encourage timely Council progress in advancing a cooperative management program to provide tools for the fleet to address bycatch restrictions.

Sincerely,



Pat Branson
Mayor, City of Kodiak

Cc: Commissioner Sam Cotten
Senator Lisa Murkowski
Senator Dan Sullivan
Representative Don Young
Governor Bill Walker
Lt. Governor Byron Mallott
Senator Gary Stevens
Representative Louise Stutes