

May 30, 2025

Ms. Angel Drobnica, Chair
North Pacific Fishery Management Council
1007 West 3rd Ave., Suite 400
Anchorage, Alaska 99501

Re: Addressing C3 Pelagic Trawl Gear Definition/Innovation at the NPFMC

Dear Chair Drobnica and Members of the Council,

We, the undersigned fishing families, organizations, scientists, community advocates, and Tribal organizations, write to express our concern about the routine seafloor contact occurring in Alaska's pelagic or "midwater" trawl fisheries, particularly within the Bering Sea and Gulf of Alaska pollock fisheries.

"Pelagic trawl" by universal definition refers to gear fishing mid-water, as the name implies. However, mounting evidence, including reports from the Council's Fishing Effects model, independent research, and trawl industry testimony, shows that some part of this gear routinely contacts the seafloor a significant amount of the time. Gear that makes bottom contact the majority of the time is not mid-water, and this incorrect definition undermines habitat protections and the sustainability and integrity of Alaska's fisheries and management systems.

We respectfully urge the Council to take the following steps:

- Amend the definition of pelagic trawl in federal fisheries to clarify that pelagic trawl gear does not operate on the seafloor.
- Require reliable seafloor contact monitoring tools, such as contact sensors, as a condition of pelagic trawl use to monitor and enforce the definition, and establish a timeline by which such tools must be in place.
- Prohibit pelagic trawl gear from being used in areas that are closed to bottom, or non-pelagic, trawling or mobile bottom contact gears, unless it can be reliably proven, in an enforceable manner, that the gear is not in contact with the seafloor.

We believe that trawl fisheries must be held to the same high standard of stewardship and sustainability that defines Alaska's broader seafood industry. Transparent enforcement, gear accountability, and habitat protection are essential to ensuring resilient marine ecosystems and healthy fisheries for future generations.

Thank you for your attention to this matter and your continued service to North Pacific fisheries and communities.

Sincerely,

The Undersigned

A. M. Jordan	Anne warner	Bob Scowcroft
A. V. Kilby	Ann Karkoska	Bonnie Andersen
Adam Zenger	Ann Marie Meyer	Brad Byers
Alan Dial	Ann McDonald	Brad Fields
Alan Hickman	Ann Siner	Brian Lawhead
Alex Cubero	April Williams	Brian Rosborough
Alexis Eyler	Arthur D. Sajecki	Brian Zwick
Alison G Browm	Arthur Dunlap	Britta Mullan
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Alva Greenberg	Audrey Alfson	Caleb Jennings
Amanda Piatt	Audrey Beam	Cale LaDuke
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Andrea Reed	Barbara MacAlpine	Captain Robert Heay
Andrea Warner	Barbara Matheson	Carl A. Soderland
Andrew Currie	Barbara Miller	Carl Russell
Andrew Shetter	Barbara Myers	Carole Guffey
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Angie Cogland	Ben Griess	Carolyn Nichols
Anita Cohen	Benjamin L. Rasche	Catherine Croom
Anja Phenix	Bethany andersen	Catherine Davey
Ann Bayes	Beth Gile	Cathy Jean Potter
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Chris Jacobson	David Johnson	Duane Larson
Christina Sofranec	David Kubiak	Edgar Chancellor
Christine James	Dawn Alderfer Powers	Edward Lemon
Christine Larsen	Deann Crandall	Edward Mazurek
Christine O'Connor	Debbie Goodykoontz	Edwin Waleryszak
Christopher Hashiguchi	Deborah S. Friedman	Elizabeth Allen
Chung Ha	Deirdre Creed	Elizabeth Hanson
Cindy Beck	Denise Bujold	Elizabeth H Smith
Clayton Smith	Devon Fernandez	Ellen Jaimes
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Cooper Freeman	Diana S Goth	Emmy Garnish
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Cynthia Lagoudakis	Dolores Soffer	Evan Thompson
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Daniel J Purnell	Don Rase	Frank Patterson
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Darius Kasprzak	Dot Rickard	Fraser Nelson

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Garrett Elwood	Hope and Samuel (Sandy) Hale	Jennifer Patterson
Garrison Goth	Hope McGratty	Jeremy
Gary Hepler	Ian Seward	jeremy robida
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Genevieve Shields	Jacque Allen	Jim Ayers
George R O'Connor	James a blake	Jim Hanson
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Glenn Hirsh	James Graue	JoAnn Tredennick
GLoria Pryzant	James H. Ihrke	Joe Maurer
Grace Allan	James Huck	Joe Morein
Graeme Frazier	James Lewis	John Boulden
Gregory Mawyer	James Pfeiffenberger	John Burton
Hahlen Behnken Barkhau	James schneck	John DeGroot
Hannah	James Shelden	John Harrod
Hannah Heimbuch	Jamie O'Connor	John Higgins
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Harmony Wayner	Janice Heck	John Little
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Heather Schaefer	Jayden	John O'Connor
Helen Hedden	Jed Fawaz	John Pollocm
Henry Bedford	Jeff Russell	John Sisk

John Sonin	Kevin Ewing	Lisa Proud
Johnston Evans	Kevin Walker	Lorene Lynn
John W Hein	Kevin Whitworth	Loretta Austin
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Jon McBride	Kristen	Lorrie Switzer
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Joyanne Bloom	Kristine Harder	L P Felton
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Julie K Wahl	Kyle volberding	Lynnda Kahn
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Karen Christopher	Lance Young	Lynne M Dunn
Karen Johnson	Larry R Yuva	Lynn Kunau
Karen McCammon	Lawrence Armstrong	Margaret Arnett
Kari Millstein	Leann Cyr, PhD	Margaret Schroeder
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Katherine Huff Pinard	Lila Little	Mark D. Faiusch
Katherine Loewen	Linda Albrecht	Mark Keappler
Katherine McLaughlin	Linda Elisabeth Behnken	Mark Saviers
Kathleen C. Clark	Linda Kenwood	Marlys Fox (Backley)
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Robert Bundy	Sarah Rhodes	Steven Busch
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Robert Fairley	Sara Rice	Steven F Jess
Robert Goth	Scott Fengler	Steven Sheaf
Robert Harding	Scott McCormick	Steve Skora
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Terry Perensovich	Vicki Clark	
Theresa Arthur	Vicki Huffman	
Theresa Murry	Walker Lourie	
Therese Harvey	Walter T Hughes	
Thomas Cerwonka	Warren Libby	
Thomas Ely	Webber Katie	
Thomas Gerrity	wendy cushmsn	
Thomas Graves	Werner Rhein	
Tiffani Swanson	Wes Mullan	
Tim Anderson	Weston Hoard	
Tim Gallagher	Whitney V Wilkinson	
Tim Geoffrion	William Allan	
Tim moon	William Andrews	
Timothy Schwartz	William Dunn	
Todd Stegman	William Lindow	