

June 7, 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 764 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	Andrew Mueller	Audrey Alfson
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Denise Middlesworth	Edward Mazurek	Frank Patterson

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