



2200 Alaskan Way, Suite 420
Seattle, WA 98121
(206) 441-1990
www.goldenalaska.com

January 31, 2025

Madame Chair and Members of the Council
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, Alaska 99501

Re: Public Testimony on Preliminary Draft Environmental Impact Statement (DEIS) and Scoping Report

Dear Madame Chair and Members of the Council,

Thank you for the opportunity to submit testimony on the Bering Sea Chum Salmon Bycatch DEIS and Scoping Report. My name is James Mize, I currently serve as President of Golden Alaska Seafoods and as the IPA Representative for the Mothership Salmon Savings Incentive Plan (MSSIP).

Golden Alaska Seafoods owns and operates an at-sea mothership seafood processor active in the mothership sector of the Alaskan Bering Sea pollock fishery, annually processing more than 4.5% of the directed fishery. The shareholders of Golden Alaska Seafoods also own and operate several boats active in other Alaskan fisheries. The company and its fleet seasonally employ more than 175 people. The majority shareholder is a Western Alaskan Community Development Corporation, and the company employs significant numbers of Western Alaskan natives from villages in the region. Our business, our employees, our partners and their crews all depend upon the health and stewardship of Alaska fishery resources managed by the Council.

My comments today focus on the sufficiency of the draft analysis to inform Council decision-making, some of its limitations, and opportunities for improvement. My comments reflect over a decade of experience managing fleet operations in the mothership sector not only at Golden Alaska Seafoods (and before that, at Phoenix Processor Limited Partnership), but also as IPA Representative for the Mothership Fleet Cooperative.¹ This perspective gives me insight into mothership fleet behavior in response to regulatory action, or concerns over potential regulatory action, which I hope may be of use in evaluating the alternatives.

As a first observation, the draft analysis shows that only Alternative 4 and Alternative 5, option 5.3 (cap on Cluster 2 corridor area) could potentially improve western Alaska chum bycatch with a relatively neutral effect on Chinook salmon bycatch (Table 1-5). The analysis correctly identifies that Alternatives 2 and 3 would result in changes in fishing behavior that would likely increase costs, result in loss of revenues, extend the duration of the season, increase bycatch of Chinook salmon, and not result in significant savings of

¹ Given timing for submittal of public comment and lack of internal board review, I offer these comments as my own personal views and not on behalf of either organization.

western Alaskan chum salmon. Since Alternatives 2 and 3 are not responsive to the goals of this potential management action, I won't comment on them any more than acknowledging that they are unworkable. Instead, I will focus my comments on Alternatives 4 and 5.

As the IPA Representative for the MSSIP, I am naturally supportive of the use of Incentive Plan Agreements in responding to and reducing salmon bycatch in all levels of abundance of both salmon and pollock. I note that many of the proposed modifications to requirements of IPAs have already been adopted by the participants in the IPAs, demonstrating that industry not only cares about reducing its salmon bycatch, but also proactively takes steps to do so despite such measures not being currently mandated by regulation.

In several places the analysis points out that fleet behavior will likely change in response to regulatory closures or the threat of such closures, but that the nature and extent of such behavior change is uncertain. The fact that fleets have voluntarily adopted more stringent measures than that which is required under regulation is clear evidence of this observation.

This fleet behavior change under Alternative 4 provisions could be better analyzed with existing data, however. In section 4.2.3, Alternative 4 is described in a single paragraph that dismisses the impacts as slight, saying that expected impacts are discussed under Alternative 1. But they are not. Further, while Table 3-32 identifies closure of statistical areas according to CPs bycatch rates, where is the analysis on such closures for the MSSIP or ISSIP? And why is such analysis limited to 2022 and 2023? Data are available for these assessments and so far as I could see, is not presented in the DEIS.

The mandatory closure of high bycatch rate ADF&G statistical areas is a strong tool to add to IPAs as a backstop against current Rolling Hotspot Closure programs and should be thoroughly analyzed. I had expected to see an analysis similar to what Council staff had prepared for the November 2012 Bering Sea Chum Salmon PSC Management Measures Initial Review Draft Environmental Assessment,² where a series of triggered closures based on statistical areas were evaluated. Without such analysis, the DEIS does not provide sufficient information for the Council to evaluate the environmental effects or economic impacts of Alternative 4, provision 6. Inclusion of such review will improve the analysis and give the public a meaningful opportunity to comment on the potential benefits and corresponding costs of Alternative 4.

I have heard some folks say that Alternative 5 would provide an important "backstop" for the IPAs to make sure that IPAs will take chum bycatch seriously, but this comment seems to be more political or semantic than real, as Alternative 4, provision 6, provides such backstop without having been analyzed. Nonetheless, if this political and semantical aversion to including the backstop in IPA provisions is a concern such that Alternative 5 is preferred, I offer comments as for how it could be improved.

Alternative 5 is overbroad. Closure of entire cluster areas I or II or the Unimak Area are big areas that fail to acknowledge the location-specific nature of chum salmon bycatch occurrences. Moreover, these proposed triggered closures unnecessarily eliminate productive pollock fishing grounds where chum salmon bycatch has been demonstrated to be avoidable.

The analysis could be improved by consideration of more discrete corridors that correlate with historic chum salmon bycatch occurrence. As I already asked above, why not look at the triggered closures that were analyzed in 2012? I am also aware of a proposal from the UCB Chum Work Group that would suggest very large closures but leave some productive, low bycatch areas such as Unimak Pass (the

² https://meetings.npfmc.org/CommentReview/DownloadFile?p=60d031c3-0f91-43d3-b39f-f11c428668a8.pdf&fileName=C2b_BSAI_Chum_Salmon_Bycatch_Review.pdf

“Horseshoe”) open so that productive pollock fishing could continue, albeit in limited grounds. The analysis could be improved by looking into these more refined trigger closures.

One thing that this draft analysis does well, subject to limitations, is identify that triggered closures will cause displacement of effort, and that fleets will move as a result of such closures or in advance of such closures being triggered due to fears that they will close.

Big, overbroad triggered closures and fear thereof will definitely influence fleet behavior. Fishing boat captains’ risk aversion is such that they will take the short-term slowdown in fishing over a risk of blanket loss of productive fishing grounds. Captains in our fleets will make collective decisions to fish in less productive areas that are farther away rather than lose access to fishing grounds. But slowing the rate of the fishery will push the fishing until later in B season, where the analysis from Amendment 110 made it clear that there is higher Chinook salmon bycatch. It is not clear that the analysis identifies how much this slowdown may affect Chinook salmon.

The Fleet Movement Model does not address differences in fish quality inside and outside the analyzed closure areas. This especially matters to Golden Alaska Seafoods due to its processing capacities and ability to make products responsive to market demands. The MV Golden Alaska is a dedicated fillet production factory, and is only equipped to produce low value recovery-grade surimi. To meet market specifications, the factory needs average fish size of 700 grams, mostly found in Cluster I & II and Unimak areas. Areas to the northwest have been shown to have lots of smaller pollock, in the 450-500 gram range. The Golden Alaska fleet loses money fishing on such small fish. Were a big, overbroad closure area be triggered, the Golden Alaska fleet would be faced with a decision to go backwards, losing money, or to stand down and wait for suitable grounds to reopen. The Fleet Movement Model assumes no stand down would occur, but in reality, no fisherman can sustain fishing for a loss for long.

The UCB proposal rightly acknowledges that the horseshoe below 115 fathoms is pretty good at avoiding chum salmon hits. It is also close to town, minimizing lengthy transits that would slow the pace of the fishery and extend fishing into October, when Chinook salmon bycatch tends to increase. It also can often have the aggregations of schooling year classes at a more optimal size for fillet production. Golden Alaska is dependent on the horseshoe to balance fishing production and timely prosecution of the fishery to minimize its Chinook salmon bycatch. We would ask that the Council request further analysis that would consider more discrete closures than the big closures currently in Alternative 5 of the DEIS.

Thank you for consideration of my comments.

Best,

A handwritten signature in black ink, appearing to read "James Mize", with a long horizontal flourish extending to the right.

James Mize
President, Golden Alaska Seafoods
Mothership Salmon Savings Incentive Plan, IPA Representative