

Dear Chairwoman Drobznica and Members of the council,

My name is Doug Ison and I am an operator of the F/V Seadawn, which is a 124 ft catcher vessel, home ported in Newport Oregon. I've been fishing in the Bering Sea for 25 years. I'm also a third generation fisherman, second generation fishing in the Bering Sea. AFA pollock is our main source of income. It is our staple that we depend on yearly. With roe prices being down for quite some time B season pollock has become our main fishing season for the year. If a chum cap caused an early season closure I believe the only option we'd be left with is tying the boat up until A season and attempting to find employment elsewhere.

I understand and am empathetic towards the declining salmon numbers in western Alaska. Growing up and still living in the small fishing community of Newport Oregon I've seen what fishery closures and declining numbers in fisheries for commercial and subsistence harvest can do. It has Always been a policy aboard the Seadawn to be proactive towards avoiding bycatch. With technology today we are able to communicate with other fishing boats on the grounds and get real time estimates on bycatch and area hot spots. Always networking with other vessels and even at times other fish plants to make informative decisions on where not to fish to avoid salmon hot spots. I believe the IPA does help us avoid salmon bycatch as a baseline. As far as measures we personally take to avoid salmon would include Always using a salmon excluder when fishing for pollock whether A or B season and making sure its in good working order, networking constantly with other vessels and fish plants and even offshore fleets to stay in the know of any and all salmon reports whether big or small. With most vessels having Starlink internet communicating via WhatsApp, emails, phone calls, etc has never been easier or more useful.

While I'm committed to continuing to improve our ability to avoid salmon bycatch, the overall PSC limits in Alternative 2 and 3 would only create a secondary crisis by closing the B season pollock fishery, with little benefit to Western Alaska Chum. The data in the analysis shows that the majority of Chum taken by all sectors in the Bering Sea are hatchery chum from Russian and Asian origin, so a cap would just protect those hatchery chum. The B season pollock fishery is essential for Alaska's seafood industry and there would be negative impacts to not only us as catcher vessels but also our shoreside processors and all the support businesses that rely on us. With the current market conditions down we are all in survival mode as it is. A hard cap would only make things even worse. Between upkeep on gear, shipyard costs rising and pollock prices lower then we've seen in over a decade I feel that we would b at a breaking point.

We have shown that IPA's can be effective in reducing chum salmon bycatch and updating the regulations to include the improvements that we have voluntarily implemented in recent years so that they are always required is important. The

ability to change the details of the IPA agreement on a regular basis is an invaluable tool that allows us to continue to react in a timely manner due to changes in the fishery. One thing I know is no two years are the same as far as where and when exactly salmon will be. So many factors come into effect as far as different areas and depths and it's constantly changing.

I am open to considering Alternative 5 but it needs to be refined because Cluster 1, Unimak and Cluster 2 are huge areas and take up most of our fishing grounds as a catcher vessel. We typically only travel roughly 120 miles because when we go further its difficult or impossible to maintain our commitment to delivering fresh, quality fish and make the trip economically feasible. Its simple, farther you have to travel the higher the fuel costs, quality of product goes down. With high fuel costs in the summer and the pollock market in the condition its in it makes it even harder to try and make a living as it is. Every season is different and so is the areas containing bycatch. So the need to make sure whatever rules, areas and regulations that are put in place are also flexible and able to change with the conditions facing the fishery at the current time. I believe having any set closure area before fishing that said area to see if chum bycatch is even an issue at the time makes no sense. Another thought is seeing about making closure areas smaller in the clusters so that it doesn't close out clean fishing areas that historically don't produce high chum numbers. The problem is one said area may have high chum numbers in say July but not in August or September or vice versa.

Being a lifelong fisherman I understand how hard it can be with declining numbers of a certain species whether it be for commercial, subsistence or the environment. But we are always looking at ways to improve not only salmon bycatch but all bycatch. With that I hope I've explained how choosing Alternative 2 or 3 or not being more intentional Alternative 5 could have irreversible consequences to the pollock fishery and how many more peoples lives it would effect for the negative. Thank you for the opportunity to comment.

Sincerely,

Doug Ison