

RE: C2 - Chum Salmon Bycatch - Initial Review

Madam Chair Drobica and Members of the Council,

My name is Michael Golston, and I am the captain of the F/V Alaska Rose, a 124-ft catcher vessel that fishes pollock in the Bering Sea during both A and B seasons. I have been fishing pollock for nearly 18 years, starting as a processor on a factory trawler before working my way up to deckhand, engine room, and eventually the wheelhouse. Fishing is not just my livelihood; it's my passion and way of life.

The importance of salmon to Alaska's people is something we in the pollock fishery understand deeply. Over the years, I have participated in numerous projects aimed at reducing salmon bycatch, including testing salmon excluders with cameras, using lights to guide salmon out of nets, and prioritizing innovative ways to improve our methods. My crew and I make substantial efforts, whether it's investing in added fuel costs, spending extra time on the water, or purchasing specialized gear, to ensure that we are doing everything we can to reduce bycatch, particularly Chum and Chinook salmon.

I want to acknowledge the devastating salmon declines in Western Alaska and express empathy for the impact this has on the people and communities who rely on these fish for subsistence and cultural traditions. As fishermen, we understand the value of sustainability and share a commitment to ensuring that salmon continue to return to the rivers of Alaska for generations to come.

That said, implementing the PSC limits proposed in Alternatives 2 and 3 would create a secondary crisis by effectively shutting down the B Season pollock fishery, with minimal benefit to Western Alaska chum salmon. The data has shown that most chum salmon taken as bycatch are of Russian and Asian hatchery origin, meaning a hard cap would protect those hatchery stocks, while devastating the Alaska pollock fishery. B Season accounts for over 50% of my vessel's quota, which makes it the backbone of our operation and livelihoods. With current market conditions already challenging, the economic impacts of a closure would ripple through not just my crew but also our shoreside processors, suppliers, and the entire support network that relies on this fishery.

IPAs have proven effective in reducing chum salmon bycatch, and I strongly support updating regulations to incorporate the improvements we've voluntarily implemented. The flexibility to adjust IPA agreements regularly is critical for responding to changing conditions and ensuring we can continue to fish responsibly.

While I am open to considering Alternative 5, it should be refined to avoid closing critical areas of accessible cleaner fishing. For vessels like mine, making long runs of 200 miles or more significantly increases costs and makes delivering fresh, high-quality fish economically unfeasible. Closure areas in clusters should be targeted, with flexibility to adapt based on real-time conditions. Additionally, any system implemented under Alternative 5 should address the need of having a system in place for reopening areas when WAK chum abundance recovers to levels sufficient for subsistence and commercial fisheries.

In closing, I want to reiterate my empathy for the salmon declines and my commitment to continuing efforts to reduce bycatch. However, choosing Alternatives 2 or 3 or failing to carefully refine Alternative 5 would have irreversible consequences for the pollock fishery, jeopardizing countless livelihoods and communities that depend on it. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Golston', with a stylized, cursive-like script.

Michael Golston

Captain, F/V Alaska Rose