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North Pacific Fishery Management Council
605 W 4th Avenue, Suite 306
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Dear Madam Chair and Council Members,

On behalf of United Catcher Boats (UCB), which represents the majority of catcher vessels in the American Fisheries Act (AFA) Bering Sea pollock fishery, we thank the Council for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Bering Sea chum salmon bycatch management. We appreciate and recognize the extensive work that has gone into developing the alternatives under consideration and the DEIS. As a fleet with a longstanding commitment to cooperative bycatch avoidance, we support performance-based solutions that are grounded in science and operational practicality. As participants in a federally managed fishery, we urge the Council to advance an alternative that meets the Purpose and Need of the action and appropriately balances the Magnuson-Stevens Act's (MSA) National Standards, including sustainable yield, bycatch minimization, and practicality.

UCB supports Alternative 4 as the most effective and practical alternative that addresses the Council's Purpose and Need. It would codify additional provisions to the Incentive Plan Agreement (IPA) requirements that would improve avoidance of Western Alaska (WAK) chum salmon. The additional provisions are aimed at mitigating high chum bycatch years, prioritizing the avoidance of WAK chum, and would most effectively advance the objectives of Amendments 91 and 110 for Chinook avoidance. When the Council requested industry to take action on chum bycatch in 2022, the sectors timely updated the IPAs with many of the new provisions listed under Alternative 4. Although these measures were adopted by the fleets, many costs and benefits associated with the implementation of new IPA provisions went unanalyzed or were considered the status quo. Importantly, Alternative 4 is not status quo, it builds on tools already

driving operational decision-making and bycatch avoidance in real time, without the need for rigid caps or fixed closures.

UCB unequivocally opposes Alternatives 2 and 3, which would impose fixed hard caps on chum salmon bycatch without accounting for stock composition, fishery behavior, or the broader ecological conditions driving WAK stock declines. Alternatives 2 and 3 do not meet the Purpose and Need for many reasons, most significantly because neither acknowledges all sources of chum mortality nor focuses on avoidance of WAK chum specifically. These two alternatives have the least focus on WAK chum conservation, would incentivize a race for fish up to a cap, and limit operational responsiveness in the pollock sector that is needed to achieve the objectives of Amendments 91 and 110. Salmon bycatch management works best when vessels retain incentives and responsiveness to avoid high-risk areas rather than race against a fixed cap that would have minimal conservation benefits for WAK chum. Alternatives 2 and 3 rely on blunt prohibited species catch (PSC) caps that would impose significant economic disruption without a commensurate increase in conservation benefit, as documented in the AEQ and economic analyses.

UCB categorically opposes Alternative 5 because its corridor-based closures and limits would severely and disproportionately impact catcher vessels and shoreside operations without providing meaningful conservation benefits or advantages over the performance-based avoidance measures under Alternative 4. While certain components of the in-season corridor framework in Alternative 5 are intended to address spatial and temporal overlap with Western Alaska stocks, this approach would displace fishing effort later into the B season when Chinook bycatch is more likely, increase congestion on limited fishing grounds to the detriment of fleet safety, and degrade the effectiveness of IPA tools. For these reasons, the corridor options in Alternative 5 ultimately fail to meet the Purpose and Need as effectively or defensibly as Alternative 4. UCB emphasizes that the Council should not advance hard-cap or PSC limit approaches, whether Bering Sea-wide or corridor-based, that reduce incentives for salmon avoidance, concentrate effort into smaller fishing areas, and create unavoidable economic and safety risks for vessels, processors, and coastal communities.

Context for Alternative 4 relative to Alternatives 2 and 3

The AFA pollock fishery operates under a requirement for 100% observer coverage, full retention of PSC, and census of all salmon bycatch. The observers must also take samples from 1 in 30 chum salmon bycatch for genetic testing by NOAA. Vessels from all three sectors fully participate in sector-specific IPAs. These IPAs are binding contracts that satisfy federal regulations at 50 C.F.R. § 679.21(f)(12)(iii)(E). Pursuant to the IPAs, fishery participants utilize in-season, best available and near real-time data, as well as performance-based metrics to incentivize the fleet to avoid salmon bycatch. Recently all three sectors updated their IPAs to include new WAK chum-focused provisions to mitigate high bycatch years. The provisions were carefully developed to provide additional tools to the pollock trawl fleets to improve chum

avoidance (specifically WAK chum) while maintaining the priority objective of avoiding Chinook salmon.

The Inshore sector has also partnered with the regional non-profit Bristol Bay Science and Research Institute (BBSRI)[1] who, in collaboration with NOAA, have implemented the Western Alaska Chum Bycatch Assessment. The goal of the project is to provide more timely chum bycatch stock composition information that can be used by the fleet to reduce impacts on WAK chum. The BBSRI team takes samples from each inshore B season delivery using the same genetic stock markers that NOAA uses, but samples at a higher frequency than NOAA observers. The results from this sampling are reported to the IPA managers and the public on a weekly basis. This weekly in-season genetic data informs the fleet's avoidance measures and enhances their efforts to avoid WAK chum.

Alternative 4 builds directly on the collaborative salmon bycatch management developed under the IPAs. **The fleet actively uses real-time data, rolling hotspot closures, and genetic information to inform targeted spatial and temporal avoidance of Western Alaska origin chum salmon**. The additions that Alternative 4 would add to the IPAs are not status quo, they are significant advances in conservation, cooperation, and partnership which the fleet has committed to at its own expense. These measures include the required use of salmon excluders for the full duration of the fishing year, the application of in-season genetic information and prioritization of WAK chum avoidance, additional evaluation of bycatch per week, and a fleet-wide threshold for Rolling Hot Spot (RHS) closures. These have been combined with the many proven salmon bycatch avoidance practices already employed by the fleet. **These tools are not theoretical; they are applied daily and continue to evolve based on emerging science and fleet experience.** Since implementing these enhanced conservation practices in 2023, the fleet has seen measurable improvements in bycatch avoidance and WAK chum stock composition estimates.

From 2021 to 2024, the inshore fleet has experienced a decline in total chum bycatch annually (341,433 in 2021, 131,849 in 2022, 66,776 in 2023 and 21,710 in 2024).[2] More importantly, in the last two years when inseason genetic data was available to the Inshore fleet, they reduced the WAK chum stock composition of their chum bycatch from 14.6% in 2023 to 13.8% in 2024 and to 6.4% in 2025.[3] These measurable improvements by the inshore sector to minimize WAK chum specifically, are not without cost. This focused effort to avoid WAK chum bycatch comes at very real costs to the fleet, including additional fuel consumption to move areas, uncertainty in pollock catch per unit effort (CPUE), presence of other prohibited species in new areas, and increased uncertainty of a lightning strike as fleet movement into less familiar fishing grounds

[1] https://www.bbsri.org/.
[2] *See* BBSRI Chum Bycatch Assessment 2024 Annual Report, *available at* https://www.bbsri.org/_files/ugd/bc10d6_326b3674373e47979ed1a1eeb173d2ba.pdf
[3] NOAA ABL Genetics Program https://repository.library.noaa.gov/view/noaa/47923 and BBSRI 2025 weekly reports available by subscribing at: https://www.bbsri.org/inseason-chum-genetics

reduces the availability of recent, shared bycatch information, increased wear and tear on and replacement of salmon excluders, and more overall pressure on fishermen during their daily operations. Fishermen bear the costs of avoiding WAK chum before their nets even touch the water in B season. PSC and Chum avoidance is at the forefront of their responsibilities, and it is the first and last thing they think of every day in B season. **The IPAs adaptive framework has allowed for near real-time response to changing conditions, enabling the fleet to concentrate fishing effort where the risk to WAK chum stocks is least expected.** This framework retains incentives for the fleet and maintains accountability without implementing rigid hard caps, which can limit flexibility without delivering meaningful conservation benefit.

Unlike the flexible and effective IPAs, Alternatives 2 and 3 rely on blunt hard caps, and Alternative 5 substitutes hard caps with corridor-based closures and PSC limits, yet none meaningfully reflect the episodic, spatially concentrated, and highly variable nature of chum bycatch risk in the pollock fishery. Additionally, since the Council's Purpose and Need clearly states that "it is important to acknowledge and understand ALL sources of chum mortality and cumulative impacts of various fishing activities," it is important to highlight the adult equivalency estimate (AEQ). **Specifically, Table 3-33 in the DEIS makes clear that the pollock fishery accounted for only 1.75% of AEQ removals of Western Alaska chum salmon on average between 2011 and 2022** while the vast majority of chum removals occur in other fisheries, including those managed by the State of Alaska. This comparison would result in an even lower AEQ if Area M fishery removals were included.

The Bering Sea pollock fishery encounters low proportions of WAK chum in their bycatch. Considering that "not all WAK chum salmon caught as bycatch in the pollock fishery would have survived to return to their natal streams,"[4] it is obvious that the pollock fishery's bycatch is not driving WAK chum declines. Assuming otherwise or not using AEQ to evaluate impacts on the WAK chum stocks disregards National Standard 2's mandate that fishery conservation and management measures be based on the best scientific information available. Imposing caps or corridor closures on a fishery already investing heavily in avoidance of a minor proportion of their bycatch is a disproportionate response that prioritizes political optics over science and fails to meaningfully address the real drivers of WAK chum declines. **At final action, the Council must reject politically motivated measures aimed at public perception and instead adopt science-based, proportional actions that "minimize bycatch of WAK origin chum salmon in the EBS pollock fishery consistent with MSA, National Standards, and other applicable law."** If Council action departs from science-based, proportional management, NMFS and the Secretary of Commerce retain responsibility under the Magnuson-Stevens Act to ensure final regulations are consistent with federal law and national fisheries policy.

Table 2-34 of the DEIS (page 117) presents a comparison of the mean AEQ reductions for the Coastal Western Alaska (CWAK) and Upper/Middle Yukon reporting groups, alongside total

[4] DEIS 3.3.4.1.3.

chum salmon PSC reductions and potentially foregone pollock (mt) expressed as a percentage of B season totals, across the PSC limits analyzed under Alternatives 2 and 3. These estimates are derived from a stochastic retrospective model using historical data and are intended to illustrate relative tradeoffs between costs and benefits under different PSC limit scenarios.

Under the most conservative PSC limit analyzed (100,000 chum salmon), the model estimates a mean AEQ reduction of approximately 56% - 57% for CWAK and Upper/Middle Yukon reporting groups across all apportionment options. It is important to place this estimate in context. **The modeled AEQ reduction represents approximately 57% of the estimated 1.75% total impact of pollock-fishery removals on Western Alaska chum salmon returns, rather than a 57% increase in total returns.** At the same time, the analysis indicates that achieving this level of modeled AEQ reduction would result in the foregone harvest of approximately 37% of the B-season pollock catch.

In the same exercise, as PSC limits increase to 325,000 and 550,000 chum salmon, the estimated AEQ reductions decline sharply, generally into the low-teens or single digits, while **still resulting in considerable foregone pollock harvest**. As NMFS notes in the DEIS, these retrospective estimates do not account for costly changes in future fishing behavior, and the extent to which an overall PSC limit would actually reduce Western Alaska chum salmon bycatch is contingent on how the fleet responds operationally.

Tables 2-35 and 2-36 of the DEIS (page 118) quantify the economic consequences of hypothetical B-season closures associated with the PSC limits analyzed under Alternatives 2 and 3, estimating both annual average gross first wholesale revenue forgone (in 2022 dollars) and the percentage reduction in B-season revenue across sectors using historical data from 2011–2023.

At the lowest PSC limit analyzed (100,000 chum salmon), the DEIS estimates substantial economic losses across all sectors. **The economic impact does not just stop at the sector or fishery level, but trickles down into coastal communities, support services, and other fisheries**. As shown in Table 2-35, annual average foregone first wholesale revenue is estimated at **approximately $330 million across sectors**, including losses of roughly $115 - $121 million for catcher-processors, $153 - $182 million for the inshore sector, $21 million for CDQ groups, and $33 million for mothership operations, depending on the apportionment method. Table 2-36 shows that these losses translate to B-season revenue reductions ranging from approximately 24% - 26% for catcher-processors, 34% - 40% for the inshore sector, 16% for CDQ groups, and more than 27% for motherships.

As PSC limits increase to 325,000 and 550,000 chum salmon, the magnitude of revenue loss declines but remains material, particularly for the inshore sector and CDQ groups under certain apportionment options. Even at higher PSC limits, the DEIS shows continued revenue reductions across sectors, underscoring that hard caps impose significant economic risk well beyond the vessels directly constrained by closures. The magnitude of revenue loss would be even greater if

fleets take additional costly measures to avoid chum and still end up shut down due to exceeding a cap.

These economic impacts would ripple through the broader pollock supply chain. Shoreside processing plants rely on consistent pollock deliveries to remain viable and to support employment, infrastructure, and cold-storage capacity that benefits Alaska fisheries more broadly. Early closures and reduced deliveries increase the risk of a plant idling or consolidating, threaten year-round and seasonal employment, and disrupt the financial stability of coastal communities that depend on pollock revenue as the foundation of local economies. As NMFS notes elsewhere in the DEIS, these retrospective estimates also do not account for future behavioral responses, meaning the realized economic impacts could vary depending on how fleets adjust fishing strategies under hard cap constraints.

There are also serious safety implications. Alternative 2 or 3 closures could force vessels to operate later in the season, when Bering Sea conditions are more hazardous, or travel farther from Dutch Harbor and other ports to find suitable fishing grounds under Alternative 5 corridor closures. For inshore catcher vessels, these longer runs increase fatigue, mechanical risk, and exposure to severe weather. In addition to safety concerns, these extended transits and tow duration significantly increase fuel consumption and operating costs, adding financial strain to vessels already working hard to avoid bycatch through more precise cooperative measures.

There is not a meaningful tradeoff between conservation and economics. Alternatives 2 and 3 fail to deliver meaningful conservation outcomes while imposing disproportionate costs. The decline in WAK chum returns, as recognized in the DEIS, is driven by complex, large-scale ecological factors such as changing ocean conditions linked to climate variability and warming, competition from hatchery-origin chum released in large numbers by Russia and Japan, disease, prey and depredation, and harvest in other fisheries. Alternatives 2 and 3 ignore these factors and instead rely solely on total bycatch numbers without regard for genetic origin. Alternatives 2 and 3 are very unlikely to provide meaningful conservation benefits to WAK chum stocks that have experienced declines. **Alternatives 2 and 3 do not meet the Purpose and Need, nor do they balance the National Standards.**

Treating all chum salmon as biologically equivalent by way of disregarding stock composition of chum bycatch in the pollock fishery does not meet the Purpose and Need. The majority of chum bycatch in the pollock fishery consists of hatchery-origin fish, not the wild stocks of conservation concern. **Using hard caps that do not distinguish between stock of origin risks diverting focus from more effective, targeted tools like that of the IPAs and the objectives of Amendments 91 and 110.** Genetic stock identification that aids in spatial and temporal understanding of WAK chum movement is critical to ensuring that conservation efforts actually benefit the WAK chum populations at risk.

Alternative 5: Corridor Caps and Closures Are Not a Substitute for Performance-Based Avoidance

UCB does not support Alternative 5 for final action. For clarity and completeness, UCB provides the following discussion for informational purposes only, regarding how the corridor options, particularly Option 2, could operate. This description is provided solely to inform the Council's understanding of Alternative 5 and should not be construed as support for, nor an endorsement of, Alternative 5 or any of its options. In UCB's view, Alternative 5 introduces corridor-based PSC limits and closures that are likely to create impacts to catcher vessels by way of displacement, congestion on limited fishing grounds, and unintended bycatch and safety consequences, with uncertain incremental conservation gains compared to Alternative 4. Unlike Alternative 4, which strengthens incentives and accountability for real-time avoidance, Alternative 5 relies on corridor PSC limit triggers and closures that can constrain fishing behavior in ways that are not responsive to daily, vessel-level and fleet-level avoidance decision-making.

The in-season corridor, explored in Alternative 5, covers genetic clusters 1 and 2, where 84% of Western Alaska chum bycatch occurred between 2011 and 2023. While it broadly targets management efforts where and when WAK chum stocks are most likely encountered, the WAK chum avoidance tools under Alternative 4 are more precise, effective, and less impactful to the fleet while still targeting where and when WAK chum stocks are most likely encountered.

From a catcher vessel perspective, effective chum salmon management should reflect how bycatch risk actually occurs, episodically and variable by time and location. Approaches should allow management measures to respond to in-season conditions, preserve avoidance incentives, reduce displacement, and minimize unintended impacts on other protected species and coastal communities. To assist the Council's deliberations, the table below summarizes Alternative 5 and its associated options and suboptions for informational purposes only, focusing on operational impacts, safety, economic security, and the risk of unintended consequences (including potential effects on Chinook bycatch) that may result from displacement of the fleet.

Option 1 of Alternative 5 would close all 40 Alaska Department of Fish & Game (ADF&G) statistical areas within the in-season corridor once the corridor chum salmon PSC limit is reached, requiring vessels to operate completely outside the corridor for the remainder of the closure window, without regard to differences in WAK chum salmon encounter rates across the corridor, or pollock CPUE.

Suboption 1 would preserve access to approximately 25% of the in-season corridor by exempting 11 ADF&G statistical areas, including the "horseshoe" in genetic cluster 1, where the catcher vessel fleet has historically observed strong pollock CPUE and low chum salmon bycatch.

Option 2 is often characterized as providing greater operational responsiveness because it would rely on in-season weekly chum bycatch genetic data and pollock CPUE to inform annual corridor

design; however, it would still depend on corridor-based caps and closure triggers that constrain avoidance incentives, concentrate fishing effort on limited fishing grounds, and limit the fleet's ability to respond dynamically to changing conditions within a given B season.

Additionally, the displacement and delayed fishing associated with corridor-based closures under Alternative 5 risk shifting pollock effort into periods and areas with higher Chinook salmon encounter rates, undermining priority Chinook conservation objectives established under Amendment 91. Relative to the other corridor options, Option 2 is also described as the most capable of adjusting over time, as corridor configurations could evolve based on updated data, making it the most dynamic of the three corridor approaches. **Even so, this relative dynamism does not overcome the fundamental limitations inherent in corridor PSC limit and triggered closures.** Both Suboption 1 and Option 2 reflect efforts intended to better align conservation objectives for Western Alaska chum salmon with operational realities, but neither provides the adaptive, real-time responsiveness achieved through the performance-based avoidance tools under Alternative 4.

Table 1. UCB analysis of Alternative 5 measures.

Summary of Alt. 5	**Operational Responsiveness**	Operationally Harmful. Use time/area management rather than fleet-wide hard caps, allowing fishing to continue outside the corridor and after August 31st.
	Reliance of CV Inshore Area	Concentrates management within genetic clusters 1 and 2, including areas closer to the AK Peninsula.
	Safety Considerations	Mixed. Area restrictions may increase congestion depending on option selected.
	Economic Security	More predictable than hard caps but still introduces risk of early closures.
	Ability to Prosecute fishery	Yes, outside the corridor during the closure window and inside the corridor after August 31st.
	Benefits to WAK Chum	Targets areas and times where 84% of WAK chum bycatch historically occurred, improving focus compared to hard cap measures.
Option 1: Full corridor closure (40 stat areas)	**Operational Responsiveness**	Severely Constraining. Closure of entire corridor once PSC limit is reached offers limited adaptability.
	Reliance of CV Inshore Area	High reliance on inshore fishing grounds; a full corridor closure would shift effort outside the corridor, disproportionately impacting smaller vessels and increasing costs and season length.
	Safety Considerations	Potential safety concerns if vessels are displaced to areas further from port, especially in poor weather conditions.
	Economic Security	Reduced economic security due to potential loss of access to core fishing grounds during peak season.

Option 1: Full corridor closure (40 stat areas) (cont.)	**Ability to Prosecute fishery**	Limited; fishing may continue only outside the corridor until September 1, if PSC limit is exceeded.
	Benefits to WAK Chum	Potential benefit is conditional, arising primarily if the PSC limit is exceeded early and fishing is fully restricted in areas of greatest historical WAK chum presence; benefits depend on limited operational adaptation and the extent of effort redistribution outside the corridor.
Suboption 1: Partial corridor closure (29 stat areas closed/11 open)	**Operational Responsiveness**	Operationally Harmful. Preserves access to approximately 25% of the corridor.
	Reliance of CV Inshore Area	Continues reliance on nearshore "horseshoe" areas with historically strong pollock CPUE and low chum bycatch.
	Safety Considerations	Improved relative to Option 1 by preserving nearshore grounds allowing for safer operational choices, especially in poor weather.
	Economic Security	Greater economic stability by maintaining access to historically productive fishing grounds.
	Ability to Prosecute fishery	Yes, continued fishing inside exempted stat areas and outside the corridor.
	Benefits to WAK Chum	Maintains conservation focus while recognizing spatial variability in chum encounter risk.
Option 2: IPA Selected Stat Area Closures (19-29 Closed)	**Operational Responsiveness**	Constrained and Risk-Prone. Allows dynamic selection of closed areas using best available catch, bycatch, genetics, and CPUE data.
	Reliance of CV Inshore Area	Reliance on the nearshore grounds remain high, but incentives created as conditions can change based on performance.
	Safety Considerations	Potential improved safety by enabling avoidance of unsafe or congested areas.
	Economic Security	Great economic security through adaptive management and responsiveness.
	Ability to Prosecute fishery	Yes, with targeted closures that preserve fishing opportunities where risk is lower.
	Benefits to WAK Chum	Potentially strong benefit if IPA decisions effectively align the corridor with most recent inseason genetic stock composition data for WAK chum.
Option 3: Abundance Based Threshold	**Operational Responsiveness**	High when triggered. Suspends corridor closures entirely in years of strong Yukon River chum returns
	Reliance of CV Inshore Area	Reduces pressure on nearshore areas by maintaining full corridor access.
	Safety Considerations	Improves safety by avoiding displacement – driven congestion.
	Economic Security	Strong economic benefit in years when in-river return thresholds are met.

Option 3: Abundance Based Threshold (cont.)	**Ability to Prosecute fishery**	Yes, allows uninterrupted fishing inside the corridor, when in river return thresholds are met.
	Benefits to WAK Chum	Benefit is indirect; relies on stock wide abundance indicators rather than in-season bycatch conditions.
Option 4: Adjustment of Winter HSA Start Date	**Operational Responsiveness**	Moderate. Extends operational responsiveness late in the B season.
	Reliance of CV Inshore Area	Minimal effect on inshore reliance; primarily temporal.
	Safety Considerations	Improves safety by reducing need to avoid multiple overlapping closures.
	Economic Security	Supports completion of B season and reduces cumulative PSC disruption.
	Ability to Prosecute fishery	Yes, allows additional fishing time before potential Winter HSA closure.
	Benefits to WAK Chum	Indirect; does not directly target WAK chum but may support chum avoidance by making a low chum area available.

The extent of potential WAK chum conservation under all three corridor options of Alternative 5 are contingent upon a high PSC limit as well as an apportionment based on historical average level of bycatch. Chum bycatch is majority NE and SE Asian or EGOA/PNW stock of origin, depending on year, therefore the likelihood of the PSC limit being exceeded is driven by the presence of non-WAK hatchery chum. **A low corridor PSC limit and/or an apportionment NOT based on historical bycatch, increases the risk of early corridor closure to catcher vessels, which in turn forces large amounts of pollock fishing outside of the corridor and into September and October. This poses significant impacts to Chinook bycatch, and major economic impacts to vessels, processors, CDQ groups, and coastal communities. Inseason WAK chum avoidance tools are also compromised by a low PSC limit because the focus is shifted away from stock of origin to overall number of chum, which again, is driven by foreign hatchery stocks. A low PSC limit, as well as pro-rata or AFA apportionment, could not only risk reducing the focus on WAK chum conservation, but could risk degrading the effectiveness of IPAs—both of which the Purpose and Need identifies as priorities when considering management measures.**

UCB does not support the selection of Alternative 5. While we recognize the Council's intent to address WAK chum conservation, Alternative 5 remains a cap-and-closure framework that risks significant negative impacts to catcher vessels, especially those in the inshore sector, without delivering meaningful conservation gains. **The Council should not replace inseason,**

performance-based avoidance, and real-time accountability (Alternative 4) with corridor PSC limits and closures that will restrict effective fleet response to dynamic conditions.

Conclusion

UCB urges Council members to support Alternative 4 as the only alternative that reflects both the conservation realities facing Western Alaska chum salmon and the operational realities of the pollock fishery. Alternative 4 builds on demonstrated success and codifies bycatch management provisions focused on minimizing WAK chum and high bycatch. Many of these provisions in Alternative 4 have recently been implemented per the Council's request and their actual function can be examined, rather than conceptualized. Alternative 4 preserves the adaptive, real-time decision-making necessary to reduce bycatch where and when risk is highest.

By contrast, Alternatives 2 and 3 rely on fixed hard caps that do not deliver meaningful conservation gains and risk imposing significant economic, safety, and community impacts. Such outcomes are inconsistent with the Council's obligation and the Purpose and Need statement's goal of balancing conservation with sustained yield using science-based management. Alternative 5 similarly relies on PSC limit triggers and closures that can degrade avoidance incentives and displace effort in ways that undermine both conservation and economic objectives.

The pollock fleet has responded decisively to the Council's direction, investing heavily in avoidance, innovation, and cooperative management. That leadership should be met with management decisions that reinforce and build on demonstrated success, rather than substituting inflexible limits and closure triggers for real-time avoidance and accountability. UCB stands ready to continue working with the Council to advance solutions that are scientifically sound, capable of delivering real conservation outcomes, and operationally viable.

Thank you,

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