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March 31, 2015

Dan Hull, Chair
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Re: Halibut Fishery Bycatch Amendment

Dear Chairman Hull:

On behalf of the O'Hara Corporation, we submit the following comments regarding the North Pacific Fishery Management Council's ("Council") consideration of revisions to the Bering Sea/Aleutian Islands ("BSAI") Pacific halibut prohibited species catch ("PSC") limits. The O'Hara Corporation operates three "Amendment 80 sector" catcher-processor ("C/P") vessels that fish in the Bering Sea and Aleutian Islands of Alaska, and is adding an additional ship to its groundfish fleet in the summer of 2015.

The Council is currently preparing an amendment to reduce bycatch limits for BSAI halibut. Alternatives under consideration contemplate up to 60% cuts in Pacific halibut PSC limits for the limited access Amendment 80 ("A80") trawl fleet, and up to a 50% reduction for other fisheries.

The O'Hara Corporation has several concerns with this action. The amendment is not being developed in accordance with the National Standards. Most notably, any major proposed cuts to PSC limits for the non-target fisheries with the intent of increasing catch limits for the BSAI target halibut fishery constitute an allocation solely for economic purposes in violation of National Standard 5. Furthermore, such a drastic reallocation of the halibut resource also fails a practicability test as required by the Magnuson-Stevens Fishery Management and Conservation Act ("M-S Act"). Finally, a major action that would have severe economic impacts to large portions of the fishery and the economy requires the preparation of an Environmental Impact Statement ("EIS") under the National Environmental Policy Act ("NEPA").

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I. DECREASING PSC LIMITS IN ORDER TO INCREASE DIRECTED FISHERY CATCH LIMITS WOULD VIOLATE MULTIPLE NATIONAL STANDARDS

The Initial Review Draft of the Environmental Assessment (“Draft EA”) to revise BSAI halibut PSC limits describes the objective of reducing PSC limits as “to minimize bycatch to the extent practicable, potentially provide additional harvest opportunities in the directed halibut fishery, and help improve halibut stock conditions.”¹ The purpose and need for the action also describes the goal of satisfying National Standard 8.² These goals are not only unfulfilled by the range of alternatives under consideration, but the alternatives in fact run afoul of National Standards 8 and 9, as well as several others.

The cited principles provide a very weak rationale for the proposed action in light of the entire legal framework. National Standards 8 and 9, contrary to what is stated in the Draft EA, do not justify an action to reduce PSC limits. Moreover, there are no environmental benefits whatsoever to this amendment. Rather, it has no purpose other than to economically reallocate the halibut stock among fishery components. National Standards 4, 5, 3, and 1 in particular provide a strong mandate to retain the current allocation. If the Council chooses to reallocate and provides sound justification for doing so, such reallocation must be fair to both the directed and non-target fisheries.

a. The Amendment Provides No Benefits to the Halibut Stock

The Pacific halibut stock is not overfished, and while the International Pacific Halibut Commission (“IPHC”) has not defined a level of fishing pressure that would constitute overfishing, biomass is generally stable and there is no evidence that overfishing is occurring.³ Reducing PSC limits for halibut would have *no biological benefits whatsoever*. Indeed, the Draft EA expressly highlights this point:

[I]t is unlikely that groundfish fishing under the status quo, or Alternative 1, has direct or indirect impacts on Pacific halibut sustainability. While the halibut

¹ North Pacific Fishery Management Council, *Initial Review Draft, Environmental Assessment/Regulatory Impact Review/Initial Regulatory Flexibility Analysis for Proposed Amendment to the Fishery Management Plan for Groundfish of the Bering Sea/Aleutian Islands Management Area: Revise Bering Sea/Aleutian Island Halibut Prohibited Species Catch Limits* (Jan. 19, 2015) at 13.

² *Id.* at 14.

³ National Marine Fisheries Service, *Stock Status Updates 2014 Quarter 4 Update through December 31, 2014* (2015), available at: http://www.nmfs.noaa.gov/sfa/fisheries_eco/status_of_fisheries/status_updates.html.

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biomass has declined from peaks in the late 1990s, the estimated female spawning biomass appears to have stabilized or be slightly increasing. Halibut mortality in the groundfish fisheries is taken into account when the commercial halibut quotas are set, to prevent significantly adverse impacts on the halibut stocks.⁴

Fishery catches are characterized as either over 26 inches (“O26”) or under that length (“U26”). Reductions in O26 mortality have no effect on the stock condition, because any reductions are rolled over into higher catch limits for the directed fishery. There may be some biological advantage in reducing mortality of U26 fish—since a greater number of individuals make up an equivalent weight, shifting mortality to larger fish may increase downstream productivity. However, the Draft EA states that these “savings” from reducing PSC below current levels would accrue to the directed fisheries in both the near and long term. Not only does this raise issues of equity—as it essentially takes a down payment from one group of fishermen and assigns the interest to another—but it would clearly create economic rather than biological effects. This certainly does not justify the goal of improving halibut stock conditions.

It is also unclear what benefits the Council seeks to attain for the halibut stock. Although, as mentioned above, biomass has declined somewhat, it has stabilized and is not at risk of being overfished. The IPHC has stated that the recent declines in recruitment are completely within the normal range for this stock. In fact, recruitment in the past two decades was at a historic high, and current recruitment rates are therefore indicative of regular stock health.⁵ The high levels of juvenile recruitment to the commercial fishery were strongly associated with the Pacific Decadal Oscillation, which was in a positive ‘phase’ between 1977 and 2006.⁶ Therefore, it is far more likely that environmental conditions, rather than fishing pressure, led to the stabilization of biomass at current levels.

b. The Amendment Violates Multiple National Standards

The Council has mischaracterized certain National Standards, while ignoring others, in its justification for this action.

⁴ Draft EA at 16.

⁵ International Pacific Halibut Commission, *Report of Assessment and Research Activities 2014* (2015), at 175.

⁶ *Id.* at 97.

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National Standard 4 – Allocations

The Council's action to revise BSAI halibut PSCs is, at its essence, an allocative decision. Under this standard, allocations must be fair and equitable, reasonably calculated to promote conservation, and preventative against excessive shares.⁷ The National Standard 4 language is also closely mirrored in the Northern Pacific Halibut Act of 1982,⁸ which is a binding United States law.

Notably, National Standard 4 does not allow for rote prioritization of the directed fishery over all other BSAI fisheries. Rather, the National Standard Guidelines suggest the following:

An allocation of fishing privileges should be rationally connected to the achievement of OY or with the furtherance of a legitimate FMP objective. Inherent in an allocation is the advantaging of one group to the detriment of another. The motive for making a particular allocation should be justified in terms of the objectives of the FMP; otherwise, the disadvantaged user groups or individuals would suffer without cause.⁹

There is no justification for this reallocation in the Draft EA or in the Fishery Management Plan for Groundfish in the BSAI Management Area ("FMP"). The FMP enumerates 46 objectives, many of which directly conflict with one another, and most of which mirror language in the National Standards. Even if the Council were to cherry-pick among these objectives, none provide a compelling justification for major PSC limit reductions. An economic allocation that will provide major economic impacts to one sector of the fishery, to provide marginal benefits to another (as described below) flies in the face of fairness and equity and, given that there is no compelling justification in the FMP's objectives, violates National Standard 4.

⁷ 16 U.S.C. § 1851(a)(4).

⁸ 16 U.S.C. § 773c(c) ("If it becomes necessary to allocate or assign halibut fishing privileges among various United States fishermen, such allocation shall be fair and equitable to all such fishermen, based upon the rights and obligations in existing Federal law, reasonably calculated to promote conservation, and carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of the halibut fishing privileges.").

⁹ 50 C.F.R. § 600.325(c)(3)(i).

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National Standard 5 – Efficiency

National Standard 5 states that “[c]onservation and management measures shall, where practicable, consider efficiency in the utilization of fishery resources; *except that no such measure shall have economic allocation as its sole purpose.*”¹⁰

Given the complete absence of biological justification for this action, it prima facie violates this National Standard. Additional details on the economic allocation restriction were provided in the Senate Report accompanying the Sustainable Fisheries Act in 1996. The report stated that the intent of this provision was to:

...prevent such measures from having an economic allocation as their sole purpose. This standard is not intended to constitute a basis for allocating resources to a specific fishing community or provide preferential treatment based on residence in a fishing community. As clearly stated in existing national standard four, conservation and management measures shall not discriminate between residents of different States, and any necessary allocation or assignment of fishing privileges must be fair and equitable to all fishermen...¹¹

The preferential treatment of one fishing community over another, and discrimination among states, is precisely what this action proposes to do.

Furthermore, even if the economic allocation provision did not exist, this action violates the first portion of National Standard 5. The Draft EA explicitly acknowledges that Alternative 2 (“Revised Halibut PSCs”) could lead to inefficiency and lower catch per unit effort.¹² This inefficiency, then, must be afforded consideration in light of the total tradeoffs. The Guidelines provide further clarification:

Where conservation and management measures are recommended that would change the economic structure of the industry or the economic conditions under which the industry operates, the need for such measures must be justified in light of the biological, ecological, and social objectives of the FMP, as well as the economic objectives.¹³

¹⁰ 16 U.S.C. § 1851(a)(5) (emphasis added).

¹¹ Senate Report 104-276 (1996).

¹² Draft EA at 16.

¹³ 50 C.F.R. § 600.330(e).

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Again, in order to forcibly change the fishery's economic structure, the FMP's objectives must provide compelling reasons to do so. In this instance they do not—particularly, as discussed above, for an action with no biological benefits.

National Standard 3 – Management Units

National Standard 3 states: “[t]o the extent practicable, an individual stock of fish shall be managed as a unit throughout its range, and interrelated stocks of fish shall be managed as a unit or in close coordination.”¹⁴ This principle is generally cited in relation to jurisdictional issues for stocks that cross state, federal, or international boundaries. In that regard, the Pacific halibut stock is managed as a unit with a stock-wide assessment and target catch levels.

However, there is more to this National Standard—management measures should be selected based on their impacts across an entire stock area. Partitioning of allowable catch into extremely specific area/gear/target fishery configurations, with precise catch limits on each component, does not make sense when the overall health of a stock is not jeopardized. In particular, the sensitivity of exploitable yield in the directed fishery to changes to bycatch estimates within the 4CDE regulatory area should not be a persuasive rationale for greatly limiting bycatch. Given the limited knowledge about juvenile dispersion and the fishery's resilience to recent changes in catch within the area, area-specific goals are not appropriate and do not justify this action.

National Standard 1 – Optimum Yield

National Standard 1 requires that management measures must achieve optimum yield from each fishery in the U.S. fishing industry.¹⁵ Optimum yield is defined, in relevant part, as “the amount of fish that will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities...”¹⁶ Contemplated benefits include national nutritional and economic needs, among others. The National Standard Guidelines provide additional considerations for optimum yield specification, including social, economic, and ecological factors. In effect, this means that what constitutes optimum yield is somewhat left to a Council's discretion. The most pertinent factors to this determination are the same as those discussed in the practicability discussion below.

¹⁴ 16 U.S.C. § 1851(a)(3).

¹⁵ 16 U.S.C. § 1851(a)(1).

¹⁶ 16 U.S.C. § 1802(33)(A).

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c. The Amendment's Stated Purpose Is Not Compelling

National Standard 8 – Communities

National Standard 8 requires Councils to minimize adverse economic impacts on fishing communities, and provide for the sustained participation of such communities.¹⁷ Despite the major legal flaws with the amendment to reallocate the halibut stock, the Council cites this principle as its primary justification. However, even the guidelines for this standard do not support that rationale.

The National Standard 8 regulations, echoing the Senate Report above, state that the standard “does not constitute a basis for allocating resources to a specific fishing community nor for providing preferential treatment based on residence in a fishing community.”¹⁸ A fishing community, as defined under the M-S Act, is “...substantially dependent on or substantially engaged in the harvest or processing of fishery resources to meet social and economic needs, and includes fishing vessel owners, operators, and crew and United States fish processors that are based in such community.” This definition does not, notably, limit consideration of impacts to those communities that are geographically adjacent to a given fishery. Rather, the Council must also consider communities in coastal areas of both Alaska and the Pacific Northwest that are heavily dependent upon this resource, and not preferentially allocate resources to certain communities.

National Standard 9 – Bycatch

National Standard 9 requires fishery management measures to minimize bycatch.¹⁹ This is the Council's secondary justification for the amendment. While halibut catches in fishery sectors that are subject to PSC limits clearly fall under the statutory definition of “bycatch,” National Standard 9 is strongly tempered by a practicability standard. Bycatch must be minimized only to the extent practicable while achieving optimum yield. As discussed below, it is simply not reasonable nor practicable to greatly constrain one of the nation's most economically important fisheries in order to reduce and reallocate the catch of a stock that is not overfished—or even declining.

¹⁷ 16 U.S.C. § 1851(a)(8).

¹⁸ 50 C.F.R. § 600.345(b)(2).

¹⁹ 16 U.S.C. § 1851(a)(9).

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II. MAJOR DECREASES IN PSC LIMITS IN ECONOMICALLY IMPORTANT FISHERIES, ABSENT BIOLOGICAL JUSTIFICATION, WOULD FAIL A PRACTICABILITY ANALYSIS

As stated above, there is no biological justification for reducing PSC limits in the non-target halibut fishery. Therefore, even if the reallocation was not expressly prohibited by the National Standards, it would nevertheless be subject to a practicability analysis.²⁰

The A80 sector is enormously important to the regional and national economy. It creates roughly \$1 billion annually in total output, with approximately \$571 million in total value added. It has also built a total of 6,800 jobs in Alaska, the West Coast, and elsewhere in the United States.²¹ In addition to this sector's enormous importance to the economy, the fishery is one of the "cleanest"—that is, it has one of the lowest bycatch rates—of any U.S. fishery. Halibut catch is less than 1% of its total groundfish catch by weight.²² Due to the total value of the fleet's groundfish catch, one metric ton of halibut is worth under \$20,000 in the directed fishery,²³ but approximately \$150,000 in the A80 trawl fisheries.²⁴

The PSC limit reductions, as contemplated in the amendment, would unequivocally constrain directed fishery catch in the A80 sector.²⁵ Halibut PSCs have resulted in groundfish fishery closures prior to harvesting the directed fishery's full TAC in the past, and it is all but certain that reduced PSC limits would cause this to happen more often in the future.

Despite the already low catch rates, non-target fisheries are constantly striving to reduce bycatch levels, and bycatch rates have fallen dramatically in recent years:

²⁰ National Standards 8 and 9 require minimization of adverse impacts to the extent practicable. 16 U.S.C. § 1851(a)(7), (8).

²¹ Northern Economics, *Five-Year Review of the Effects of Amendment 80* (Oct. 2014), at 106.

²² *Id.* at 68.

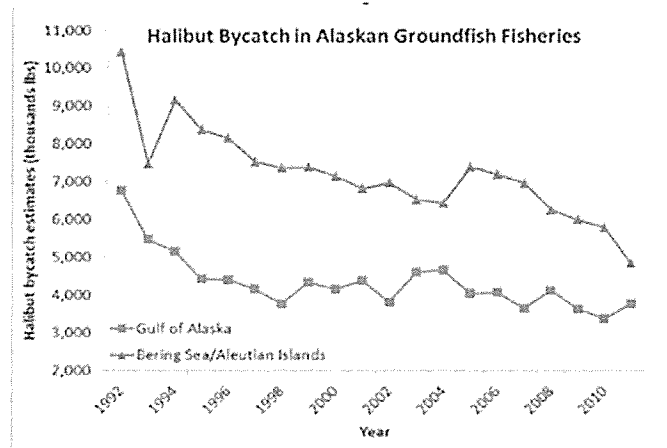
²³ See Ben Fissel et al., *Stock Assessment and Fishery Evaluation Report for the Groundfish Fisheries of the Gulf of Alaska and Bering Sea/Aleutian Island Area: Economic Status of the Groundfish Fisheries off Alaska, 2013* (Nov. 21, 2014), at 75.

²⁴ Northern Economics at 70.

²⁵ Draft EA at 18.

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Source: IPHC 2011 (net weight).

Fishermen already responded to fleet rationalization by greatly reducing bycatch in the last decade. Voluntary bycatch reduction programs in the past few years have similarly been successful. The average wholesale value of groundfish catch per metric ton of halibut bycatch rose sharply from the five years ending in 2007 to the next five years—a testament to this hard work and to the great incentives to continue to reduce halibut bycatch. Additionally, new tools exist for bycatch management including deck sorting, electronic monitoring, and halibut excluder devices. These tools are all being actively refined, with some already in use and others in the experimental stages of development. The impacts to bycatch rates and mortality from this technology must be analyzed and incorporated into management decisions as soon as it becomes possible to do so.

Furthermore, the IPHC is currently developing new methods that will better address sources of uncertainty in the assessment. In addition to the effects of the technology noted above, such sources include unassessed wastage rates in the directed fishery, static discard mortality rates, dispersion patterns of juvenile halibut, the location of nursery areas, and natural mortality of juveniles. With no biological risk to the stock, there is no practicable justification for taking an action that will inflict severe economic impacts before this uncertainty is characterized, analyzed and, hopefully, resolved.

While modifying bycatch limits would have significant and far-reaching economic impacts, it would not impact stock health. In a 2015 study, the IPHC showed that a 20% decrease in coastwide bycatch would only reduce total mortality from 36.41 to 35.84 million net lbs. under the blue line method—while increasing directed fishery landings by less than 1 million lbs. This means that the A80 sector, for example, could lose up to 20% of its total catch simply to

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provide a 5% increase in the directed fishery. Under the extended accounting (SPR) method, which takes into account all sizes of mortality, even a 40% decrease in bycatch would only increase exploitable yield in the directed fishery by less than 8%.²⁶

Clearly, a practicability analysis requires that the impacts of an action to all affected sectors are fairly considered and weighed. The significant impact of the proposed action to the A80 sector, and to the regional and national economy, simply cannot be justified based on the marginal gains that would accrue to the directed fishery.

III. ADOPTING MAJOR CHANGES TO ALLOCATIONS ACROSS FLEETS REQUIRES AN EIS

When an FMP is amended, the Council and National Marine Fisheries Service (“NMFS”) must draft an accompanying EIS or Environmental Assessment (“EA”) to describe and analyze the range of alternatives under consideration.²⁷ Whether the action requires an EIS or an EA depends upon the specific management options considered therein. Any management action that allocates fishery resources, particularly in a way that was unanticipated in the original FMP or any previous amendment, requires preparation of an EIS.

NMFS guidelines state that the determination of whether to prepare an EIS for a fisheries-related action is based on whether “significant beneficial or adverse impacts are reasonably expected to occur.”²⁸ Such significant impacts include not only biological, but also socioeconomic considerations.²⁹ Furthermore, NMFS and the Council must consider the degree to which the effects on the quality of the human environment are likely to be highly controversial in forming such a determination, and “this aspect should be used in weighing the decision on the proper type of environmental review needed to ensure full compliance with NEPA.”³⁰

Allocative decisions are controversial by nature—the act of allocating necessarily eventuates in winners and losers among heavily invested stakeholders. Furthermore, as described

²⁶ Bruce Leaman et al., *Considerations Concerning Bycatch Control and Abundance-Based Prohibited Species Catch Limits for Pacific Halibut in the Bering Sea/Aleutian Islands*, Joint NPFMC-IPHC (Feb. 5, 2015).

²⁷ 42 U.S.C. § 4332(2)(c).

²⁸ NOAA, *Administrative Order Series 216-6: Environmental Review Procedures for Implementing the National Environmental Policy Act* 6.03d.2 (May 20, 1999).

²⁹ “Socio-economic factors related to users of the resource should also be considered in determining controversy and significance.” *Id.* at 6.02i.

³⁰ *Id.*

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above, the alternatives that the Council is considering in this action would have unprecedented impacts to the regional and national economy, the employment sector, and to large numbers of individuals and businesses who depend on the fishery for their livelihood. For all of these reasons, NMFS and the Council must prepare an EIS if they choose to pursue this reallocation.

* * * * *

We appreciate this opportunity to comment on this amendment and the Draft EA. We hope you will take these recommendations into account and make deliberate, reasoned decisions based on the state of the resource, the totality of the National Standard guidance, and a thorough evaluation of practicability. As always, please do not hesitate to contact us if we can provide any further information or answer any questions about these comments.

Respectfully submitted,



Andrew E. Minkiewicz
Anne E. Hawkins

Counsel for the O'Hara Corporation

4749 Ballard Ave NW, Seattle, WA 98107



P.O. Box 70585, Seattle, WA 98127

May 8, 2015

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov
Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Doug Freyberg and I represent Ballard Industrial/Ballard Hardware & Supply. For 63 years we have been providing living wage jobs supplying commercial and industrial supplies to fishing vessels in the North Pacific and around the world. We value all of our customers and try very hard to help them succeed.

We understand that in June the North Pacific Fishery Management Council is considering cutting the halibut prohibited species cap for the Amendment 80 sector and would reallocate that halibut to another fleet of vessels. I encourage you to consider the value of the Amendment 80 fleet to our business and others when making this decision.

- *The Amendment 80 fleet is an important component of the maritime business community. Reduction in the revenues of the fleet would significantly affect revenues and jobs in the supporting maritime industry.*
- *Though we are a very small component of the maritime support industry, the Amendment 80 fleet directly supports at least 3 full time living wage employees annually at Ballard Industrial.*

Amendment 80 fishermen are an integral part of the Puget Sound maritime community. Please balance the needs all of our fishermen and strive to develop solutions that can be achieved by the Amendment 80 vessel without significantly curtailing their operations.

My sincere thanks for your consideration of this matter,

Doug Freyberg
Vice President - Managing Partner

cc: Senator Patty Murray - shawn_bills@murray.senate.gov and anna_sperling@murray.senate.gov
Senator Maria Cantwell - nicole_teutschel@cantwell.senate.gov
Congressman Rick Larsen - Matt.Bormet@mail.house.gov
Congresswoman Jamie Herrera Beutler - Jordan.Evich@mail.house.gov
Congresswoman Suzan DelBene - ben.barasky@mail.house.gov

Sara Chapman
16817 Larch Way #A208
Lynnwood, WA 98086

April 21, 2015

Chairman Dan Hull
North Pacific Fishery Management Council
605 West 4th Street, Suite 306
Anchorage, AK 99501-2252

Re: C2 Bering Sea Halibut PSC

Dear Chairman Hull:

I am a concerned citizen for the survival of the Bering Sea Halibut Fishery. I would like at least a 50% reduction in the Bering Sea Halibut trawl bycatch. I believe trawlers can fish cleaner if directed to do so. The commercial halibut longline fleet had to do so with the development of seabird avoidance gear and survived. The U.S. trawl fleet will survive economically as well.

In April 1964, the Bering Sea halibut season was declared "disastrous" on the front page of the Seattle Daily Times. The IPHC had set the catch at 6.4 million pounds, but only 1.25 million were caught before the season was closed, and the IPHC declared any future opening "improbable". The foreign trawl fleet was the culprit. They had decimated the halibut grounds. Now we have the 200-mile limit restricting their presence in our waters. Today, 50 years later, in 2015, it isn't the foreign trawl fleet but our own domestic trawl fleet threatening the survival of the halibut fishery.

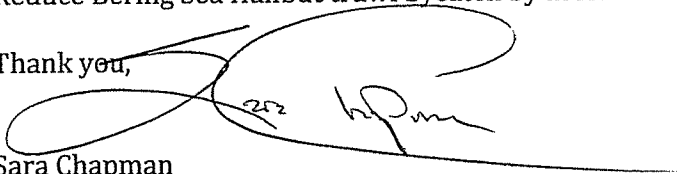
In 1977 the Magnuson-Stevens Fishery Conservation and Management Act (MSA) went into effect containing measures to manage over-fished stocks and allow them to recover, it is the principal law governing the nation's fisheries. It is the law which should govern this decision to let the stocks recover by reducing trawl bycatch by at least 50%, demanding bycatch avoidance measures, 100% observer coverage, and closing the "tender" delivery observer loophole. Unfortunately because this decision has been put off for so long, it appears dire, even radical, but had bycatch been reduced long ago we would not even be having this discussion. It is time to act decisively.

Canada has done an exemplary job cleaning up their trawl bycatch fishery. Their trawlers have developed bycatch avoidance measures, along with 100% observer coverage and their fish stocks are stable. It has been proven it can be done. We are not reinventing the wheel here. I request you do the right thing. Do not let big politics, and the estimated economically devastating statistics the trawl fleet and their support industries will throw at you influence your decision. The commercial longline fleet has already been hit hard by reductions in TAC but they continue to vote during the IPHC annual meetings in the name of conservation and sustainability. They believe in protecting the resource. Protect the halibut and like the Canadian trawl fleet the U.S. trawl fleet will stabilize. Do the right thing. Have the ethical fortitude. Do it now.

Reduce Bering Sea Halibut trawl bycatch by at least 50%.

Thank you,

Sara Chapman

A handwritten signature in black ink, appearing to read 'Sara Chapman', is written over a large, loopy scribble. The signature is positioned above the printed name 'Sara Chapman'.



May 7, 2015

Mr. Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Dear Chairman Hull,

I wanted to write you in regards to your upcoming meeting to consider cutting the halibut prohibited species cap for the Amendment 80 sector. My livelihood as well as that of my coworkers depend on the viability of this fleet of vessels. This increased restriction will harm that viability and my business as well. The Amendment 80 fishery has been a model of bycatch avoidance. I urge you to work to develop a plan that is fair, ecologically sound and doesn't hinder operations.

Amendment 80 fishermen are an integral part of my business as well as the Alaskan and Washington maritime community.

Best regards,

A handwritten signature in black ink, appearing to read 'Aaron Kitson'.

Aaron Kitson
Sparks Belting Company
206-498-1520

Subject: C2 – Bering Sea Halibut PSC Final action
From: Josh Marx <jmarxkc@gmail.com>
Date: 5/12/2015 5:44 AM
To: npfmc.comments@noaa.gov

North Pacific Fishery Management Council

Attention: Dan Hull, Chairman

RE: C2 – Bering Sea Halibut PSC Final action

My name is Josh Marx, I live in Shawnee, Kansas and I fish (recreationally) in Alaska for halibut.

I as a recreational fisherman and I am very concerned about the high level of by catch of Halibut in the Bering Sea as described in your Final action item C2 - Bering Sea Halibut PSC.

We know that the Bering Sea has a huge population of juvenile halibut and that those halibut migrate from the Bering Sea to other areas throughout the range of the pacific halibut. Right now the trawl bycatch is preventing millions of halibut from leaving the Bering Sea and repopulating other areas.

This practice must be curtailed immediately or rural communities will suffer and the future of halibut fishing all over the Pacific will continue to be threatened. These are unacceptable risks to most of the users of this iconic resource in order to the benefit of a small number of trawl vessel owners and crews. It is one thing to ask all users to conserve a resource, but it is quite another to ask most users to sacrifice and conserve the resource to benefit of a specific group of large factory trawlers. That is what is happening and it is not fair or equitable. Bycatch not only needs to be reduced and then linked to abundance, so all users can share in the sacrifice and in the benefits of a healthy resource.

Please show Alaskans you care about the communities and the halibut resource and take significant action to reduce Bering Sea bycatch of halibut to a level that provides opportunity for the rest of us and protects the millions of juvenile halibut from being caught and discarded.

Sincerely,

Josh Marx
22221 w 58th Street
Shawnee, KS 66226

RE (C2) BERING SEA HALIBUT PSC

April 9, 2015

Dear Chairman Hull,

My name is Pete Lopuzynski, I've Been Fishing on the Fishing Vessel Seymour for 27 years. In the past five years, I have witnessed my income decrease by nearly 50% due to declines in the halibut stock. I am all for conservation, but only if applied to all user groups.

I am tired of the well funded trawl industry and their lobbyists stepping on the family run businesses of the halibut industry. Why should my family and I have to suffer while big business is allowed to conduct business as usual? Because halibut trawl bycatch has been allowed to exceed that of the directed halibut fishery, I support a 50% halibut PSC reduction be adopted during final action in June. I also ask the Council to adopt the following:

- Closing the "tender loophole" in the observer program
- Increased observer coverage and/or electronic monitoring on all vessels regardless of size or fisher
- EFP to allow deck sorting of trawl caught halibut as long as there are scales and observer monitoring on deck.

Regards,

Pete Lopuszynski (Captain P.U. Seaman)

Pete Lop

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov
Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Patrick Belen and I represent Marport Stout Inc (MARPORT). We provide acoustic trawl and catch control sensors and other underwater electronics to fishing vessels in the North Pacific and around the world. We value all of our customers and try very hard to help them succeed.

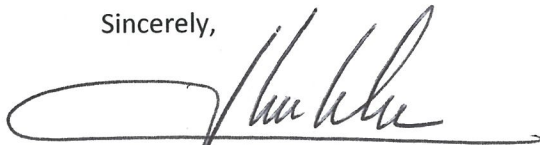
I understand that in June the North Pacific Fishery Management Council is considering cutting the halibut prohibited species cap for the Amendment 80 sector and would reallocate that halibut to another fleet of vessels. I encourage you to consider the value of the Amendment 80 fleet to my business and others when making this decision.

There is a substantial risk that reallocation of halibut will result in our customer vessels to curtail their fishing operations , hence have a negative effect in our business , with reduction of our customer base , future vessel construction projects and also, to our ability to continue re investment in development new technologies and efficiencies for our market segment .

This month, Marport have been part of the Puget Sound fishing community for 20 yearsand the Groundfish forum and the Alaska Seafood Coop. has been an important part of our past and have great hope for the future with the Amendment 80 fleet ...

Amendment 80 fishermen are an integral part of the Puget Sound maritime community. Please balance the needs all of our fishermen and strive to develop solutions that can be achieved by the Amendment 80 vessel without significantly curtailing their operations.

Sincerely,



Patrick Belen
Vice-President – General Manager
Marport Stout Inc.

cc: Senator Patty Murray - shawn_bills@murray.senate.gov and anna_sperling@murray.senate.gov
Senator Maria Cantwell - nicole_teutschel@cantwell.senate.gov
Congressman Rick Larsen - Matt.Bormet@mail.house.gov
Congresswoman Jamie Herrera Beutler - Jordan.Evich@mail.house.gov
Congresswoman Suzan DelBene - ben.barasky@mail.house.gov

**CITY OF HOMER
HOMER, ALASKA**

Reynolds

RESOLUTION 15-034

A RESOLUTION OF THE CITY COUNCIL OF HOMER, ALASKA, REQUESTING THAT THE NORTH PACIFIC FISHERY MANAGEMENT COUNCIL TAKE ACTION TO REDUCE THE QUANTITY OF HALIBUT BYCATCH IN THE BERING SEA ALEUTIAN ISLAND FISHERIES BY SETTING NEW BYCATCH LIMITS WHICH LOWER HALIBUT PROHIBITED SPECIES CATCH CAPS BY 50% OF THE CURRENT LIMITS.

WHEREAS, Coastal communities in Alaska depend on Alaska's halibut resource for sustenance, recreation, cultural traditions, and livelihood; and

WHEREAS, The halibut fishery is of critical importance to the state, providing significant income to the state and its residents through commercial and charter fisheries; and

WHEREAS, The halibut stock and fishery are in a critical state after a continuous stock decline over the last decade; and

WHEREAS, The commercial catch limits for halibut in the Bering Sea/Aleutian Islands (BSAI) region were reduced by 63% in the last decade in order to conserve halibut stocks; and

WHEREAS, Halibut bycatch limits for trawl fisheries operating in the Bering Sea, currently set at more than 7 million pounds, have not been significantly reduced for 30 years; and

WHEREAS, BSAI trawl fisheries caught and killed 7 times more fish than the directed fishery landed in the BSAI in 2014; and

WHEREAS, The majority of halibut bycatch in the Bering Sea are juvenile halibut averaging under 5 pounds; and

WHEREAS, Historical tagging studies indicate that 70-90 percent of juvenile halibut spending the first few years of their lives in the Bering Sea can and do migrate to all other areas of the North Pacific including the Gulf of Alaska; and

WHEREAS, Homer is a Gulf community and home to many commercial, sport and subsistence halibut fishermen that fish in the Gulf of Alaska and the Bering Sea, as well as a halibut fishing destination for visitors; and

43 WHEREAS, Halibut play a key role in the economies throughout Alaska including
44 Homer, therefore overall stock health, biodiversity and catch limit cuts have and will continue
45 to have dramatic effects on our fisheries, businesses, economies and communities that
46 depend on the halibut resource; and

47
48 WHEREAS, Every pound of halibut caught as bycatch in any region results in a direct
49 loss of yield and spawning biomass of the highly migratory North Pacific halibut resource;
50 and

51
52 WHEREAS, The Magnuson-Stevens Act requires under National Standard 9 that
53 bycatch be reduced; and

54
55 WHEREAS, National Standard 8 requires councils provide for the sustained
56 participation of fishery dependent communities.

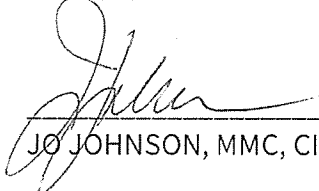
57
58 NOW, THEREFORE, BE IT RESOLVED that the Homer City Council requests immediate
59 action by the North Pacific Fishery Management Council to reduce halibut bycatch in the
60 Bering Sea Aleutian Island fisheries by not less than 50%.

61
62 PASSED AND ADOPTED by the Homer City Council on this 11th day of May, 2015.

63
64 CITY OF HOMER

65
66
67 
68 MARY E. WYTHE, MAYOR

69
70 ATTEST:

71 
72
73
74 JO JOHNSON, MMC, CITY CLERK

75
76 Fiscal Note: N/A

77
78
79

Subject: C2 Bering Sea Halibut PSC"

From: mike <mikeyanak@att.net>

Date: 5/14/2015 3:35 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

I would just love to point out the cuts and sacrifices of both the sport ,charter and commercial fisheries they have taken a big hit in the last several years. The draggers have had years to work on diminishing there by-catch. They need to be held accountable for not being able to lower their catch of halibut. We need some action on conservation of our halibut stocks. Especially in the nursery zones. Let's see some leadership on this issue. Mike Yanak PO Box 6143 Sitka,Alaska 99835

Sent from my iPad



May 14th, 2015

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

SENT VIA E-MAIL

Re: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull:

My name is Matthew Darbous and I am writing this letter as a representative of Kloosterboer Dutch Harbor, LLC. ("KDH"). As an Alaskan corporation headquartered in Seattle, we have invested more than \$50 million over the last decade in the construction and operation of a marine terminal and cold storage warehouse in Dutch Harbor that supports the Bering Sea fishing industry. This facility employs seven full-time residents and provides work for nearly one hundred other Alaskans. In addition, KDH and our affiliate partners invest millions of dollars each year in dedicated infrastructure, supply-chain resources, and support services for the fishing industry to help maximize the value of the products they harvest.

It has been brought to our attention that, in June, the North Pacific Fishery Management Council will consider reducing the halibut prohibited species cap for the Amendment 80 sector and reallocate this halibut to another fleet of fishing vessels. While we cannot speak to the conservation rationale behind such a decision, we would encourage the NPFMC to weigh the economic impacts it may have on both the Amendment 80 fishermen as well as the service industries that support them.

At present, KDH homeports four Amendment 80 fishing vessels in Dutch Harbor and provides service to numerous others. The Amendment 80 fleet will represent nearly 20% of the total frozen seafood cargoes crossing our dock this calendar year. In addition, Amendment 80 cargoes will account for almost 35% of the frozen volume shipped via our trans-Pacific trade lane. Any reduction in the frequency of fishing vessels calling our dock and/or reduction in the volume of cargoes landed at our facility would be extremely detrimental to our current operations and make it difficult to continue committing logistical resources at present levels.

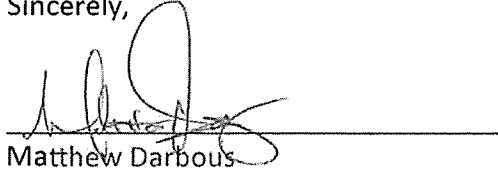
Seasonality is also a major factor influencing our support of fishery operations in western Alaska. While much of our "peak" activity in Dutch Harbor revolves around the Alaskan Pollock fishing seasons, the bottom-trawl fleet provides critical "off-peak" business that aids greatly in keeping our facility operational throughout the calendar year. A decision by NPFMC that shortened or limited the Amendment 80 fleet's operations could distinctly impact KDH's ability to staff and operate our facility, as we



currently do, on a year-round basis. Specifically, this could mean local jobs lost and/or termination of services upon which other fishing sectors depend.

Amendment 80 fishermen are an integral part of the Alaskan and Puget Sound maritime communities. When making decisions such as the halibut reallocation referenced here, we would encourage the NPFMC to consider the needs of all of our local fishermen along with the industries that support them.

Sincerely,



Matthew Darbous
Operations Manager
Kloosterboer Dutch Harbor, LLC



labeling solutions that work!

Labels Plus
2407 106th Street SW
Everett, WA 98204
ph: 800-275-7587
fax: 206-523-1973

May 12, 2015

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, AK 99501-2252
Npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Dale Bonner. I work as a Production Manager for Labels Plus in Everett Washington. For more than twenty years we have supplied the fishing industry with labels and supplies necessary for the processing of a variety of fish species. Labels Plus realizes approximately 40% of our yearly gross sales from the fishing industry. We understand that there are many factors that the NPFMC must consider in order to balance the amount of fish harvested by all the different fisheries. We hope your decision in this matter will not adversely affect one fishery more than another. Everyone involved in the fishery business is affected by the amount of fish that are caught and processed each year. We know that trying to estimate how many labels and supplies each vessel will need is really a guessing game. No one knows what the catch will be until they hit the Bering Sea and start fishing. If they have a marginal year as far as amount of fish caught goes, the following year the amount of labels and supplies ordered is reduced due to left over inventory from the previous year. All of this affects the labeling industry! In addition to Labels Plus there is also a trickle-down effect that goes to all of our suppliers. From the stock we make labels from, ink used to print the labels, packaging materials, etc. We hope your decision will be fair to everyone and not restrict or penalize one fishing industry over another. We are all just trying to make a living in this industry and we hope you will consider our concerns in this matter.

Thank you,

Dale Bonner

Cc: Senator Patty Murray – shawn_bills@murray.senate.gov and anna_sperling@murray.senate.gov
Senator Maria Cantwell – Nicole_teutschel@cantwell.senate.gov
Congressman Rick Larsen – Matt.Bormet@mail.house.gov
Congresswoman Jamie Herrera Beutler – Jordan.Evich@mail.house.gov
Congresswoman Suzan DelBene – ben.barasky@mail.house.gov

Subject: RE: C2 – Bering Sea Halibut PSC Final action
From: Jeff Nance <Jeff.Nance@fsbwa.com>
Date: 5/14/2015 10:43 AM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

North Pacific Fishery Management Council

Attention: Dan Hull, Chairman

RE: C2 – Bering Sea Halibut PSC Final action

My name is Jeff Nance, I live in Bothell, WA, and I fish recreationally in Washington for halibut. I as a recreational fisherman am very concerned about the high level of by catch of Halibut in the Bering Sea as described in your Final action item C2 - Bering Sea Halibut PSC.

We know that the Bering Sea has a huge population of juvenile halibut and that those halibut migrate from the Bering Sea to other areas throughout the range of the pacific halibut. Right now the trawl by catch is preventing millions of halibut from leaving the Bering Sea and repopulating other areas.


This practice must be curtailed immediately or rural communities will suffer and the future of halibut fishing all over the Pacific will continue to be threatened. These are unacceptable risks to most of the users of this iconic resource to the benefit of a small number of trawl vessel owners and crews. It is one thing to ask all users to conserve a resource, but it is quite another all together to ask most users to sacrifice and conserve the resource to benefit of a specific group of large factory trawlers. That is what is happening and it is not fair or equitable. By Catch not only needs to be reduced and then linked to abundance, so all users can share in the sacrifice and in the benefits of a healthy resource.

Please show Washingtonians you care about the communities and the resource and take significant action to reduce Bering Sea By Catch of halibut to a level that provides opportunity for the rest of us and protects millions juvenile halibut for being caught and discarded.

Sincerely,

Jeff Nance

1ST SECURITY BANK

Home Lending 

Jeff Nance | Home Lending
NMLS# 405731
6920 220th St SW Ste 202
Mountlake Terrace, WA 98043

Direct Dial 425-772-3341
Fax 425-984-0159
Email: jeff.nance@fsbwa.com

Mr. Dan Hull
Chairman, North Pacific Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

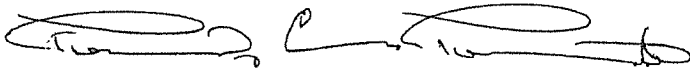
Dear Mr. Hull,

My name is Paulo Chris Prescott. I'm one of the foremen for United States Seafoods on Seafreeze Alaska. I've fished in Alaska for 18 years now and with the same company.

Fishing has been really good to me and my family. Fishing gave me and my family things that we never would be able to have before. When I started fishing, I told my parents not to work no more because it was my turn to take care of them. I help my parents with their house and cars. At times, my sisters and brothers ask me to help them with their rent. I never say no to my family when it comes to money to help them, because I know fishing has been good to me.

I always think that fishing will keep me and my family happy. But now reading about how our halibut percentage will be cut next year, I'm not sure what to do and how to explain it to my family. But this is just me. When I explained this letter to Seafreeze Alaska Processors, they ask me the same question. What are we going to do and how are we going to explain to our families. Some of our crew comes from other countries to support their family back home where it is hard to find a good job. I'm sure other fishing vessels in Alaska, crewmen are international too. We have guys from the Philippines, American Samoa, Vietnam, Micronesia, Guam, Mexico, El Salvador, Honduras, Guatemala, Cambodia. Now if our season is cut because of this halibut percentage cut, how are we going to answer them. Please, myself and Seafreeze Alaska crew is asking you, to please don't cut our fishing season down. Our lives and our families depend on this.

Thank you very much.

A handwritten signature in black ink, appearing to read 'Paulo Chris Prescott', written in a cursive style.

Paulo Chris Prescott

Mr. Dan Hull

Chairman, North Pacific Management Council

605 West 4th, Suite 306

Anchorage, Alaska 99501-2252

Dear Chairman Hull,

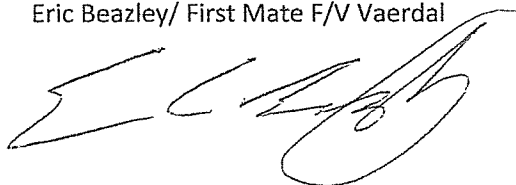
My Name is Eric Beazley and I work for United States Seafoods on the F/T Vaerdal as the First Mate. I have worked for US Seafoods since 2010, and have worked in the fishing industry in Alaska for 25 years. I completely depend on my job to support myself and help my family.

I have heard the North Pacific Management Council is considering a substantial cut to the A80 halibut bycatch limit at the upcoming June council meeting. I am concerned that a large cut in our halibut would hurt my job and reduce my future earning potential greatly. My job is extremely important to me and my family.

Fishing is all I have done since getting out of the Army in 1990. I believe that whatever percentage our halibut limit is cut by, almost the same percentage of jobs and fish harvested by the A80 sector will be seen. So if 50 percent less halibut is the number, companies will contract the fleet by a similar amount. If we were to have this large of a cut the people in the communities we offload to would see an adverse effect. Part of the the year, often the only boats working in Dutch Harbor are the A80 boats and a handful of longliners. We help to support the communities we offload in. Since A80 began in 2008 I have worked on 4 A80 boat, the Cape Horn, Arica, Oceanpeace, and Vaerdal. For the last five years I worked on the Vaerdal for US Seafoods as the mate and on deck. We are always trying to work on reducing our halibut catch as it is what allows us to harvest our groundfish. As I said in the beginning I have been fishing the Bering Sea for 25 years and in that time I have seen many changes. From when I started bottom fishing to now the boat has and continues to work extremely hard to reduce all prohib catch, not just halibut and retain the majority of groundfish we catch. I believe we are making strides in the right direction, but believe a 50 percent reduction in our halibut limit would have an economic impact that most A80 fisherman would not survive. The ancillary effect on the communities we work in and the communities we live in will be far reaching. From the fuel docks, stores and vendors we frequent in areas like Dutch Harbor, Kodiak, Sandpoint, and Seward, Alaska (just a few of the Alaskan communities the Vaerdal offloads in). To the businesses and families we support in our hometowns with the living we earn each year on each of our A80 Vessels. I for one would be lost if it wasn't for fishing in Alaska. Our A80 crew spend more time working in Alaska than they spend anywhere else. Most average 200 days per year. So we too are part of what makes fishing in Alaska great. This is one of the last places that an American without a college education can work hard and make a living wage. I hope that will not be taken away from future generations of fishermen and women.

Sincerely,

Eric Beazley/ First Mate F/V Vaerdal

A handwritten signature in black ink, appearing to read 'Eric Beazley', written over a printed name. The signature is stylized and cursive.

April 24, 2015

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

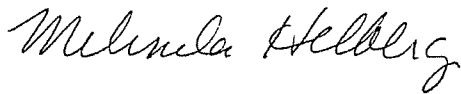
I am a purser who works for United States Seafoods on the F/T Seafreeze Alaska. I work full time on this vessel and depend on my job to support myself and my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am very worried that a large cut in our halibut will hurt our jobs and reduce our incomes greatly. Our jobs are very important to us and our families.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. We also know that it is important to consider other fisheries that depend on halibut. We ask that you think of people like us in the Amendment 80 fishery who need halibut to continue, as well as the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our Amendment 80 operation, our jobs and our families as you work on this issue.

Sincerely –



Melinda Helberg, Purser
F/T Seafreeze Alaska

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions for A80 Fleet

Dear Chairman Hull,

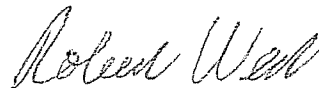
I've been a fisherman my entire working career since 1967. Roughly half of it in the Atlantic the 2nd half in Alaskan waters.

Any reduction in this sector will reduce our ability to harvest target species in the same proportion as the reduction. This will have the same effect on the ports we work out of and the communities we live in.

We work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

We of the A80 fleet would appreciate the commission's consideration on the effect of this decision on our sector.

Thanks Robert West

A handwritten signature in cursive script that reads "Robert West".

William Fitzgerald
1900 Nickerson St. #116-77
Fisherman's Terminal
Seattle WA. 98119
Mate-Seafreeze Alaska

Dear Sirs,

I was born over 50 years ago in Kodiak Alaska. My first job was working at Alaska Pacific Seafood breaking plate freezers of halibut and loading these large frozen whole fish in containers.

In those days the halibut schooners would come to town after 10-14 days of hard fishing, and the processors in Kodiak would bid on each individual load. The typical load was 50-85 thousand pounds.

By the late 70's halibut became more abundant and derby seasons in Kodiak saw every available vessel, from skiffs to large crabbers participating in these great halibut derby fisheries. It was not uncommon for larger vessels to catch 200,000 lbs. in 3 days or less.

When halibut fishing changed to a quota system my father and my best childhood friends bought halibut Q's and have fished halibut ever since.

10 years ago I started working on The Seafreeze Alaska as mate. I had no prior trawling experience and like a lot of fisherman I thought trawlers caught many different species each tow and killed a lot of fish that were not utilized. Nothing could be further than the truth. It is very common for us to catch 95-99 % of our target species. Indeed, about the only specie we do discard, is halibut, as per regulation.

Alaska has the greatest fish stocks in the world. When the total allowable catch is in the tens of thousands of tons, trawling is the only fishing method capable of catching this type of volume. We export almost all our fish to Asia where it is reprocessed and sold all over the world. These exports are vitally important to the US economy to shrink the trade deficit and offset the flow of US dollars overseas. Exporting is good and it is our responsibility to all US citizens to maximize our sustainable fish exports.

Now, the ecosystem is again changing, and the abundance of large halibut is in decline. However, in my experience, the number of smaller halibut in the Bering Sea is at a 10 year high. I do not think that halibut bycatch by trawlers is the reason for the decline in large fish and the overabundance of small fish. I think the huge increase in other stocks have stressed the halibut to a point where they no longer grow to the desired marketable size that the International Halibut Commission wants.

Rather than blame the trawlers it makes more sense to reassess the size limitation issue and to explore the possibility of fishing in more nontraditional areas.

Trawlers are using new technologies (excluders) and taking drastic evasive efforts to minimize halibut bycatch. We don't want to catch halibut and we don't want to discard good fish.

Trawlers are the most regulated industry in the US and every tow we make is sampled and the number and weight of the halibut is documented.

I think the allowable halibut bycatch for trawlers now is a workable number that strikes a good balance between allowing us to harvest these large volumes of fish and for us to have the incentive to minimize halibut bycatch.

The question is by lowering the allowable halibut bycatch will there be more large halibut available to the halibut fleet?

The answer is no it will not. It might be a politically correct solution but like the sea lion rookery issue there is no science that proves it works. There is no science that directly correlates halibut bycatch with the decline in harvestable size halibut.

The total allowable halibut bycatch has been lowered from its historical rates. The biomass of large halibut continues to decline. If it is reduced even more it will have a drastic effect on the trawl fleets ability to harvest the TAC of its target species.

Is it really worth lowering the standard of living for thousands of fisherman, hundreds of support personnel and numerous vendors and businesses? Is it really worth lowering tax revenues and lowering our nation's exports on the off chance that lowering halibut bycatch further will have a beneficial effect on a much smaller fishery?

I think not.

This is a very emotional issue for me. As I said my family and friends are in the halibut fishing business. It is incumbent on the fisheries council to come up with real viable solutions to this issue.

It may be necessary to take a more biological approach to the halibut fishery as opposed to the more marketing emphasis the IHC has stressed in the past. Groundfish stocks in Alaska are as healthy as ever and certainly sustainable using the biological management model in place today. Maybe it is time to use these same tools on halibut. After all, halibut is simply another specie of flatfish.

William Fitzgerald

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

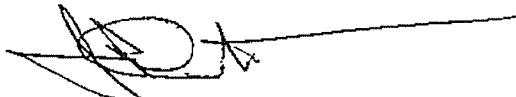
Dear Chairman Hull,

My name is Joe Curtin and I represent Motion Industries. We provide bearings and power transmission products to fishing vessels in the North Pacific and around the world. We value all of our customers and try very hard to help them succeed.

I understand that in June the North Pacific Fishery Management Council is considering cutting the halibut prohibited species cap for the Amendment 80 sector and would reallocate that halibut to another fleet of vessels. I encourage you to consider the value of the Amendment 80 fleet to my business and others when making this decision.

Amendment 80 fishermen are an integral part of the Puget Sound maritime community. Please balance the needs all of our fishermen and strive to develop solutions that can be achieved by the Amendment 80 vessel without significantly curtailing their operations.

Sincerely,



Joe Curtin

cc: Senator Patty Murray - shawn_bills@murray.senate.gov and anna_sperling@murray.senate.gov
Senator Maria Cantwell - nicole_teutschel@cantwell.senate.gov
Congressman Rick Larsen - Matt.Bormet@mail.house.gov
Congresswoman Jamie Herrera Beutler - Jordan.Evich@mail.house.gov
Congresswoman Suzan DelBene - ben.barasky@mail.house.gov

Subject: C2 Bering Sea Halibut PSC
From: Joel Steenstra <joelst99@yahoo.com>
Date: 5/14/2015 7:00 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

To Whom it May Concern:

We reside in Craig, Alaska with our two daughters. I am the Captain of the charter vessel Trinity and we hold a power troll permit we fish out of the F/V Kelper. Fishing, both commercial and charter is a vital part of our life and it allows us to reside in a small town in Coastal Alaska. We utilize halibut for both our income and for our subsistence needs. We urge you to reduce the Bering Sea bycatch by no less than 50%. Please make a meaningful cut that will allow halibut stocks a chance to rebound. Halibut are vital to us Alaska residents who make our livings in coastal communities.

Joel and Leanne Steenstra.

Subject: halibut bycatch by BSAI trawl reduced by 50%
From: Douglas Hogen <dlhogen@gmail.com>
Date: 5/14/2015 8:01 PM
To: npfmc.comments@noaa.gov

Hello,

I have been eating, subsisting on and in the past commercial fishing for Pacific halibut since 1978. I think that what is called bycatch by the commission is a fancy name for a very big waist of a very precious valuable and vulnerable resource. With out these wonderful beautiful and tasty fish Alaska just won't be the same place, way less so!!!! What will this big grand ocean be worth without that richness in it . There used to be tons of shrimp and king crab and now there is not. The trawl fishery is powerful and why , because they have made a lot of money so they can use to make less money and keep the halibut fishery from going the way of the cod on the east coast. I call for a 50% reduction in the bycatch by the Bering sea/ Aleutian Is. trawl fishery. In times like these with biodiversity on this planet being hit so hard we CAN NOT AFFORD TO WAIST ANYTHING let along a most precious fish as the Pacific HALIBUT.

I hope you will hear what I am saying here, Alaska should stay bountiful!
Thank you
Douglas Hogen
34 year resident of this great Island of Kodiak

Subject: C-2 BSAI halibut
From: Paul Clampitt <pfishcl@gmail.com>
Date: 5/15/2015 6:18 AM
To: npfmc.comments@noaa.gov

North Pacific Fisheries Management Council

May 15, 2015

Re. C-2 BSAI halibut bycatch comments,

The trawl interest in the Bering Sea are asserting that the move for a halibut bycatch reduction by their fleet is not a conservation issue but an allocation grab by the halibut longline industry.

This is not correct, the International Pacific Halibut Commission has steadily reduced the directed halibut catch limits over the last 14 years as a necessary conservation measure in response to a declining halibut resource. The IPHC would not do this if it were not to conserve the resource.

At the same time the trawl halibut bycatch cap has not changed, but remains the same as it was fixed 20 years ago when halibut was abundant. On top of that the trawl industry is killing juvenile halibut and thus reducing the possible yield that these fish would contribute to the fishery, especially since these fish will never spawn or have a chance to migrate into the Gulf of Alaska and beyond which would support the fishery all the way to California.

This is definitely a conservation issue. The halibut longline fishery is doing everything it can to conserve this fishery, and now it is the trawl industry turn to step to the plate. Mr. Chris Oliver executive director of the NPFMC in a recent video, (www.youtube.com/watch?v=YLPPychrCYw) asserts that the halibut biomass is steady, but the fact is the halibut biomass has gone down from 400 million in 1990 to 217 million ponds of spawning biomass today. He also asserts that the trawl industry dramatically lowered their bycatch voluntarily, but the fact is the bycatch mortality has gone up steadily since 2011 in 4CDE, and any bycatch reduction in the rest of the Bering Sea is most likely due to the reduction in the halibut biomass. Halibut bycatch overall is up in the Bering Sea since 2011, from 5.6 million lbs to 5.8 million lbs. (source:IPHC http://www.iphc.int/documents/bycatch/Abundance-based_PSC_Limits_NPFMC_Feb15cncl.pdf)

In conclusion:

It's time for the trawl industry to do their fair share in conserving the halibut resource by reducing their bycatch by 50%. This resource has been harvested by the longline fleet for over 100 years, which has given the American public access to this wonderful fishery. If we don't start curtailing the trawl industry's bycatch not only will this resource be destroyed but so will all the other fisheries that hard on bottom trawling effects. We can't allow the North Pacific fisheries to end up like the New England fisheries, as a merger

shadow of a once vibrant industry.

Sincerely, Paul Clampitt

Member FVOA

Owner, F/V Augustine

Subject: C2 Bering Sea Halibut PSC
From: Rod <vscharters@hotmail.com>
Date: 5/15/2015 6:52 AM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

I am sincerely asking the NPFMC to immediately reduce the By Catch of halibut by 50% or even more. This is a useless waste of a precious resource. It is time the Council take this bold step toward preserving halibut stocks in the future. If a fishery must waste that much fish in order to catch another species they should clean up their methods or be shut down.

I am unclear when it became okay to throw fish over the side dead especially at the rate of millions upon millions of pounds. There is no way anyone can justify this to me. The reality of this matter is that Corporations have made billions of dollars and manipulated the politics and rules in their favor. They are the only winners here. The losers are the average Joe that wants to catch a halibut, the independent long liners who depend on a small portion of the catch for their livelihood, the subsistence fishermen who depend on it to feed their families, the Halibut Biomass that is wasted and destroyed, and our future generations who will not have the chance to partake in the fishery.

I am begging that the Council stop giving in to pandering and back room politics and do what is right and just! Reduce Bycatch by 50% with a staggered plan to ultimately reduce it by much more.

Sincerely Rod Van Saun



Dan Hull, Chairman
North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, AK 99501-2252

May 13, 2015

Dear Chairman Hull,

On behalf of the members and Board of Directors of the Southeast Alaska Guides Organization (SEAGO) which represents charter fishing operators, lodge owners and guided sport anglers throughout Southeast Alaska, I am urging the North Pacific Fishery Management Council (NPFMC) to take action as soon as possible to lower halibut bycatch limits in the Bering Sea/Aleutian Islands (BSAI) fisheries by 50 percent.

Over the past decade, more than 62 million pounds of halibut have been killed and discarded as bycatch in the Bering Sea. In 2014 alone, the BSAI trawl fisheries killed and discarded more than 5 times the individual halibut landed in the same region. In addition, this bycatch was overwhelming comprised of juveniles that are well below the maturity level necessary to reproduce and replenish the stock.

In addition to the damage this causes in the Bering Sea region this also has far-reaching affects for all of Alaska. In tagging studies conducted by the International Pacific Halibut Commission, over 70% of halibut tagged in the Bering Sea were recovered in the Gulf of Alaska.

We appreciate the efforts, the commercial trawl fleet has made in limiting bycatch and they are to be commended on their efforts so far, but it is not enough. While the bycatch limit for the BSAI trawl fleet has hardly changed in decades, charter fleet harvests have been reduced by as much as 50% in some areas.

We urge the NPFMC carefully consider the effects of current bycatch limits on all of Alaska and adopt a 50 percent reduction in halibut bycatch by the BSAI commercial trawl fleet.

We sincerely appreciate your efforts to provide adequate protections for Alaska's fisheries.

Sincerely,

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

Ryan Makinster, Executive Director
Southeast Alaska Guides Organization (SEAGO)

Southeast Alaska Guides Organization (SEAGO)
907.244.4909
ryan@seagoalaska.org
<http://www.seagoalaska.org>

Subject: Please reduce the flat fish catch in the Bearing sea. In my 50 years of fishing of the coast of Alaska I have seen halibut stocks go away. Please cut back the by catch by 75 percent. Thanks William Brent.

From: William Brent <william.brent1947@gmail.com>

Date: 5/15/2015 9:29 AM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Sent from my iPhone

Pacific Fishermen Shipyard and Electric, LLC

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www.pacificfishermen.com

15 May, 2015

North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

Via email: npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

Pacific Fishermen Shipyard and PFI Marine Electric is a Ballard vessel repair center formed as a Co-op in 1946 by 200 Norwegian heritage fishermen and their wives by purchasing the 1870's Ballard Marine Railway. Famous for building and maintaining vessels like Jacques Cousteau's CALYPSO and a portion of the seine and crab fleet, we are concerned over proposed re-distribution of the Halibut Bycatch limits and the resultant devastating trickle down effects on our National economy.

Some small boat, Alaska-based groups are arguing that it is a resource conservation issue. This is not conservation issue. This is a socio-economic reallocation of halibut resource issue. Any reduction in the BSAI Halibut PSC amounts for use as bycatch for the trawl CP and CV vessels and the Freezer-longliner CP vessels will just be reallocated to the Area 4 c, d, e Halibut IFQ holders and the Pribilof residents who hold CDQ halibut quota.

For a number of years, the IPHC Commissioners have set the Area 4 (Bering Sea/Aleutian Islands) halibut directed harvest amount above what the IPHC staff had recommended. In addition, the halibut resource has experienced fish not really gaining a normal amount of weight as they aged. The older fish now weigh a lot less than older fish from 20 years ago. There are a lot of halibut in the Bering Sea at present but they tend to be smaller fish.

The IPHC had a change in staff over the past years and now have two biologists who are very educated and quite respected: Steve Martell and Ian Taylor. The IPHC Commissioners also have had a change in members: Phillip Lestenkof from St. Paul is no longer an IPHC Commissioner. At the last IPHC meeting when they set the 2015 season quotas, the Commission recommended a fairly big cut in the Area 4 c, d, e quotas, but not as big as the staff had recommended, as there was a commitment by the groundfish users to voluntarily reduce bycatch in the Bering Sea groundfish fisheries.

The commercial halibut IQ holders are taking advantage of having Sam Cotton, Duncan Fields and Dan Hull in leadership positions on the NPFMC and have orchestrated this campaign to reduce the BSAI Groundfish fishery's Halibut PSC limits. If there is a significant reduction in the Halibut PSC limits for the BSAI groundfish fisheries dependent on Halibut PSC, these new limits will constrain the fisheries, thereby closing the directed fisheries prematurely before attainment of the harvest limits.

As a result, not only will these fishers suffer economic ruin, but all the support industries such as ours will suffer as well. For the BSAI CV trawl fleet, this will occur for vessels that are primarily fishing for Pacific Cod in the Unimak Pass area fishery and perhaps in the Aleutian Islands region.

The pollock fishery is exempt from any Halibut hard cap closure though there is an amount of Halibut PSC apportioned to the Pollock trawl fishery (250 mt of Halibut mortality was assigned to the Pollock PSC category for the 2015 fishery) to cover any expected Halibut taken as bycatch in the Pollock fishery.

There are a few non-AFA trawl CVs that target Yellowfin Sole that will also experience some pain due to a significant reduction in Halibut PSC but most of the Yellowfin Sole quota is harvested by either the Amendment 80 C/Ps or the AFA C/Ps.

It is Pacific Fishermen's position to urge the NPFMC not to reduce the BSAI Halibut PSC limits at all, supporting the status quo alternative.

Sincerely,

Pacific Fishermen Shipyard and Electric, LLC

A handwritten signature in black ink that reads "Doug Dixon". The signature is written in a cursive, flowing style.

Doug Dixon
General Manger

cc:

Senator Patty Murray - shawn_bills@murray.senate.gov
Senator Patty Murray - anna_sperling@murray.senate.gov
Senator Maria Cantwell - nicole_teutschel@cantwell.senate.gov
Congressman Rick Larsen - Matt.Bornet@mail.house.gov
Congresswoman Jamie Herrera Beutler - Jordan.Evich@mail.house.gov
Congresswoman Suzan DelBene - ben.barasky@mail.house.gov

St. George Office:



P.O. Box 920
St. George, Alaska 99501-0920
Tel: 907-859-2263
Fax: 907-859-2312

May 15, 2015

Mr. Dan Hull
Chairman
North Pacific Fisheries Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501

Re: Bering Sea Halibut Bycatch Reduction

Dear Mr. Hull:

On this very contentious subject of bycatch reduction of halibut in the Bering Sea, many learned people have voiced their opinion. The suggestions on how this might be accomplished, the need for rule changes, the percentages of any cut in bycatch, is all over the place. Every organization, every sector of the fishing industry, people from various communities, people from various states, want to protect their respective interests.

The Council is very fortunate. It has a good staff, advisory panels, and hundreds of consultants to help it make decisions. At St. George, we do not have the financial resources to hire attorneys and consultants to help us develop position papers to clearly articulate our needs and concerns before the Council. We understand that which our governments have promised in Acts and Laws passed by our Congress. One such Act, the Fur Seal Act Amendments of 1983, is of considerable importance to us. Frankly, since its passage, the transformation of our economy from that of killing seals to fisheries has not materialized. Why? The honest answer is that our government, Federal and State, has not done its job. This means you, collectively. Given all of this, what are you going to do regarding the halibut? There is no question that this species of fish is in deep trouble. One could suggest placing halibut on the endangered list as either depleted or threatened.

Here at St. George, halibut is our only commercial fishery. Last season and this, our quota will be near 43,000 lbs. Our fishermen and community must try to make a living with this meager amount. Yet, we watch from our shores as the trawlers sweep back and forth from the Pribilof Canyon to right off the shores of St. George. After these episodes, our local fishermen, despite how hard and often they try, cannot locate or catch halibut. In our community's effort to fish for subsistence needs of halibut, those needs are not met as the halibut have vanished. It is probably safe to assume this due to bycatch and discards. On many occasions, we have contacted NMFS Enforcement complaining about the near proximity to our island these trawlers operate. The individual answering the telephone is sympathetic, but more often than not, no follow up.

We would like to ask the fishing industry to work with the community of St. George in a good faith effort to address this bycatch problem. Our fishermen deserve the right, like any, to make a living. Halibut for many is the only opportunity to earn a wage sufficient to pay for family needs like fuel for heat, groceries, electricity. We ask the industry to develop, voluntarily, a "exclusionary zone" around St. George where large scale fishing activity would not take place. We are, as many know, a small boat fishery, 25-30 foot skiffs. This exclusionary zone would allow for the rebuilding of the localized halibut stocks and other near shore species of fish. Fish that fur seals and sea birds depend to live and raise their young on our island. This effort would allow for our people to make a living at home. Something we all enjoy. For starters, we visualize this exclusionary zone to be at a minimum, 12 miles surrounding St. George Island. Again, this is a "good faith" request of the industry.

Our island and its location in the middle of the Bering Sea, is the "bell weather" for many factors affecting our environment. Your scientists have made such statements. No consideration is given to our concerns about the need for conservation. Not only has this "oversight" harmed the Aleut inhabitants of St. George, but has caused serious damage to the fur seal and seal bird populations. This begs the question, hypothetical and not meant to offend, is the government, specifically the Council, attempting to make St. George Island devoid of life? Is it possible that given the serious problems realized with halibut today, it will be another fish species tomorrow, and then the inevitable crash of all stocks?

When the Council considers all fishery allocations in the Bering Sea for all people and interests, we respectfully request that particular attention be given to "National Standard 8-Communities," on behalf of St. George. Our history on this island long predates Magnuson/Stevens in our relationship with our Government. It should come as no surprise, but the "fishery" has always been the primary concern of our Government and its relationship with the inhabitants of St. George.

We believe the Council has all the tools necessary to deal with this bycatch problem. All the different options are laid before you. In our opinion, conservation and protection is now required and necessary. We therefore request, the Council take action to "significantly reduce" the bycatch/discards. It is tempting to advocate for a hard number for this reduction as many will and have done. But, in fairness and in good faith, we must note that there are those in the affected fisheries working diligently to find ways to reduce this problem. We think a little more time to prove and demonstrate their efforts is justified. We feel, and this requires a giant leap in faith on our part, that our community cannot ever be put at risk again when it comes to the issue of halibut quotas.

Sincerely,



Patrick Pletnikoff

Mayor

Subject: "C2 Bering Sea Halibut PSC"

From: Ahr Kipling <ahrkip@gmail.com>

Date: 5/15/2015 1:39 PM

To: npfmc.comments@noaa.gov, Ephraim_froelich@murkowski.senate.gov, erik_elam@sullivan.senate.gov, bonnie.bruce@mail.house.gov

Over the past decade, as directed halibut harvest has steadily dropped in response to a declining halibut stock, a major re-allocation of the resource has occurred. Directed halibut fisheries landings have been cut by 63% in the Bering Sea since 2005, but halibut bycatch caps remain at nearly the same level set during peak abundance decades ago. This inequitable standard of conservation has created a stark disparity between halibut fishermen and fisheries that harvest halibut as bycatch in the Bering Sea. In 2014, **BSAI groundfish fisheries killed and discarded seven times more halibut (number of fish, not pounds) than the directed fishery landed** in the same region!

The BSAI halibut fishery is in the midst of a conservation and economic crisis. Not only is the directed halibut fishery facing a possible collapse from bearing the full weight of the conservation effort, but bycatch creates ecosystem-wide impacts across the North Pacific that require immediate action. BSAI halibut bycatch in 2014 came in at roughly one million fish, with an average weight of just under 5 pounds. Tagging studies show that from these large groups of juvenile halibut feeding in the Bering Sea, 70-90% of them are slated to migrate to other areas upon maturity. The removal of large numbers of these juvenile animals from the ecosystem is a critical stock concern for any halibut fisherman or consumer in the North Pacific, from California to Alaska.

you must reduce halibut bycatch caps in the Bering Sea/Aleutian Islands by no less than 50%! current halibut stocks need to be allowed to thrive in whatever environment is left to them after these draggers are done ruining their habitat! please effectively address this issue!

sincerely

darlene coyle

box 193

kasilof alaska 99610

Subject: C2 Bering Sea Halibut PSC
From: Jerry Scholand <jrryschlnd@gmail.com>
Date: 5/15/2015 2:08 PM
To: npfmc.comments@noaa.gov

I cannot believe that the commercial fishermen are still allowed to kill and waste so many halibut. Please, please, please stop this waste of our valuable resource. you have the power to do this: reduce halibut bycatch caps in the Bering Sea/Aleutian Islands by no less than 50%!!!

Thank you,
Jerry and Lou Scholand
Kiana Lodgings
58856 East End Road
Homer, Alaska 99603 USA
907 235-8824
Kiana@xyz.net
www.HomerKiana.com

Subject: Allowable halibut Bycatch: This is a real travesty that this obvious deception on the part of the take as much as you can grab commercial halibut fleet. This is poor management and heads should roll for this corruption. They are cheating humanity and future generations for their own greed. Let get it right , we want no waste and bycatch what so ever, period. All of the other user groups should all donate to a fund and buy any official who can be bought , including our so called politicians

From: Ronald J Oberhauser <fishalot4u@gmail.com>

Date: 5/15/2015 2:27 PM

To: npfmc.comments@noaa.gov

Lets investigate NOAA-- there;s another bunch of crooks being bought out by various user groups. Ronald J. Oberhauser

Mr. Dan Hull
Chairman, North Pacific Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252

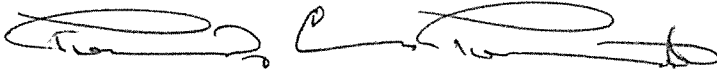
Dear Mr. Hull,

My name is Paulo Chris Prescott. I'm one of the foremen for United States Seafoods on Seafreeze Alaska. I've fished in Alaska for 18 years now and with the same company.

Fishing has been really good to me and my family. Fishing gave me and my family things that we never would be able to have before. When I started fishing, I told my parents not to work no more because it was my turn to take care of them. I help my parents with their house and cars. At times, my sisters and brothers ask me to help them with their rent. I never say no to my family when it comes to money to help them, because I know fishing has been good to me.

I always think that fishing will keep me and my family happy. But now reading about how our halibut percentage will be cut next year, I'm not sure what to do and how to explain it to my family. But this is just me. When I explained this letter to Seafreeze Alaska Processors, they ask me the same question. What are we going to do and how are we going to explain to our families. Some of our crew comes from other countries to support their family back home where it is hard to find a good job. I'm sure other fishing vessels in Alaska, crewmen are international too. We have guys from the Philippines, American Samoa, Vietnam, Micronesia, Guam, Mexico, El Salvador, Honduras, Guatemala, Cambodia. Now if our season is cut because of this halibut percentage cut, how are we going to answer them. Please, myself and Seafreeze Alaska crew is asking you, to please don't cut our fishing season down. Our lives and our families depend on this.

Thank you very much.

A handwritten signature in black ink, appearing to read 'Paulo Chris Prescott', written in a cursive style.

Paulo Chris Prescott

Mr. Dan Hull

Chairman, North Pacific Management Council

605 West 4th, Suite 306

Anchorage, Alaska 99501-2252

Dear Chairman Hull,

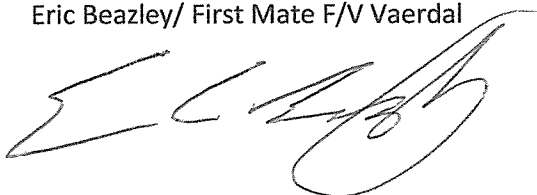
My Name is Eric Beazley and I work for United States Seafoods on the F/T Vaerdal as the First Mate. I have worked for US Seafoods since 2010, and have worked in the fishing industry in Alaska for 25 years. I completely depend on my job to support myself and help my family.

I have heard the North Pacific Management Council is considering a substantial cut to the A80 halibut bycatch limit at the upcoming June council meeting. I am concerned that a large cut in our halibut would hurt my job and reduce my future earning potential greatly. My job is extremely important to me and my family.

Fishing is all I have done since getting out of the Army in 1990. I believe that whatever percentage our halibut limit is cut by, almost the same percentage of jobs and fish harvested by the A80 sector will be seen. So if 50 percent less halibut is the number, companies will contract the fleet by a similar amount. If we were to have this large of a cut the people in the communities we offload to would see an adverse effect. Part of the the year, often the only boats working in Dutch Harbor are the A80 boats and a handful of longliners. We help to support the communities we offload in. Since A80 began in 2008 I have worked on 4 A80 boat, the Cape Horn, Arica, Oceanpeace, and Vaerdal. For the last five years I worked on the Vaerdal for US Seafoods as the mate and on deck. We are always trying to work on reducing our halibut catch as it is what allows us to harvest our groundfish. As I said in the beginning I have been fishing the Bering Sea for 25 years and in that time I have seen many changes. From when I started bottom fishing to now the boat has and continues to work extremely hard to reduce all prohib catch, not just halibut and retain the majority of groundfish we catch. I believe we are making strides in the right direction, but believe a 50 percent reduction in our halibut limit would have an economic impact that most A80 fisherman would not survive. The ancillary effect on the communities we work in and the communities we live in will be far reaching. From the fuel docks, stores and vendors we frequent in areas like Dutch Harbor, Kodiak, Sandpoint, and Seward, Alaska (just a few of the Alaskan communities the Vaerdal offloads in). To the businesses and families we support in our hometowns with the living we earn each year on each of our A80 Vessels. I for one would be lost if it wasn't for fishing in Alaska. Our A80 crew spend more time working in Alaska than they spend anywhere else. Most average 200 days per year. So we too are part of what makes fishing in Alaska great. This is one of the last places that an American without a college education can work hard and make a living wage. I hope that will not be taken away from future generations of fishermen and women.

Sincerely,

Eric Beazley/ First Mate F/V Vaerdal

A handwritten signature in black ink, appearing to read 'Eric Beazley', written over a white background.

April 24, 2015

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

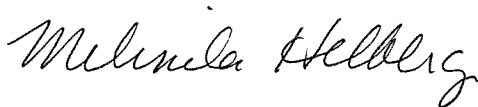
I am a purser who works for United States Seafoods on the F/T Seafreeze Alaska. I work full time on this vessel and depend on my job to support myself and my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am very worried that a large cut in our halibut will hurt our jobs and reduce our incomes greatly. Our jobs are very important to us and our families.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. We also know that it is important to consider other fisheries that depend on halibut. We ask that you think of people like us in the Amendment 80 fishery who need halibut to continue, as well as the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our Amendment 80 operation, our jobs and our families as you work on this issue.

Sincerely –



Melinda Helberg, Purser
F/T Seafreeze Alaska

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions for A80 Fleet

Dear Chairman Hull,

I've been a fisherman my entire working career since 1967. Roughly half of it in the Atlantic the 2nd half in Alaskan waters.

Any reduction in this sector will reduce our ability to harvest target species in the same proportion as the reduction. This will have the same effect on the ports we work out of and the communities we live in.

We work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

We of the A80 fleet would appreciate the commission's consideration on the effect of this decision on our sector.

Thanks Robert West

A handwritten signature in cursive script that reads "Robert West".

April 24, 2015

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

We work for United States Seafoods on the F/T Seafreeze Alaska in the Galley Dept. We work full time on this vessel and depend on our jobs to support ourselves and our families.

We have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. We are very worried that a large cut in our halibut will hurt our jobs and reduce our incomes greatly. Our jobs are very important to us and our families.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. We also know that it is important to consider other fisheries that depend on halibut. We ask that you think of people like us in the Amendment 80 fishery who need halibut to continue, as well as the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our Amendment 80 operation, our jobs and our families as you work on this issue.

Sincerely –

James T Lebo

WA AU

UDOM SAY

EFREN P. CAALIM

MOURAD AITOUCHE

Khunhuan

James T Lebo

Lee

Udom Say

Caalim

Aitouche

KHANH HOANG

April 24, 2015

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

We work for United States Seafoods on the F/T Seafreeze Alaska in the Engineering Dept. We work full time on this vessel and depend on our jobs to support ourselves and our families.

We have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. We are very worried that a large cut in our halibut will hurt our jobs and reduce our incomes greatly. Our jobs are very important to us and our families.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. We also know that it is important to consider other fisheries that depend on halibut. We ask that you think of people like us in the Amendment 80 fishery who need halibut to continue, as well as the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our Amendment 80 operation, our jobs and our families as you work on this issue.

Sincerely –

Rudy J. Perez (Chief Eng.)

Shari Morris

DANIEL CHUDEK

NOEL TOPACIO

Jeff Koehler

Okichy Johnny

Russ & Ray

[Signature]

Daniel P. Andell

Joel Topacio

A. L. L. K. L. L.

[Signature]

April 24, 2015

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

We are factory crew who work for United States Seafoods on the F/T Seafreeze Alaska. We work full time on this vessel and depend on our jobs to support ourselves and our families.

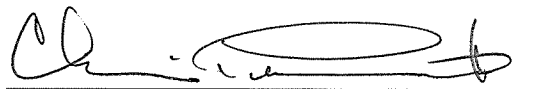
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Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. We also know that it is important to consider other fisheries that depend on halibut. We ask that you think of people like us in the Amendment 80 fishery who need halibut to continue, as well as the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.


Please consider the needs of our Amendment 80 operation, our jobs and our families as you work on this issue.

Sincerely –

Chris Prescott



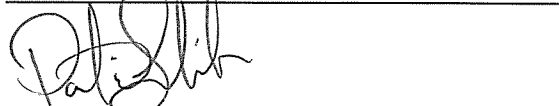
Irene M. Ioane



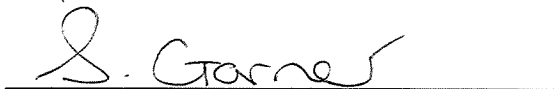
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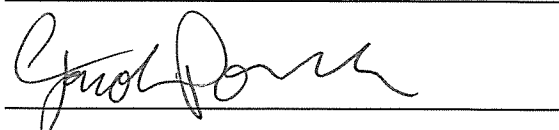
PATRICK FALANKO



Stephen Garner



JACOB POMALE



JAYRHOON BORONGAN

JRBORONGAN

ELAMMARI YOUSSEF

ELAMMARI YOUSSEF

Salua Uta.

Titania Jr. Tofa

Hopa.

Aniceto Vargas

ROCKETE TRUONG

Rocke

Pay DUNGAWIN

Vicente Contreras

Vicente Contreras

Snorey Sally

Sosea'ala

Sosea'ala

Danner Naka

TENSOR DUNGAWIN

Tensor Djin

REMEDY MATMANS

Andre's Brava

A. Brava

Jeffrey Naka

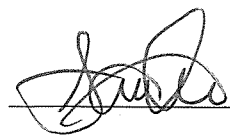
J. Naka

Carlos Calles

Carlos Calles

Jose Ricardo Aguilar

Santua Ruda



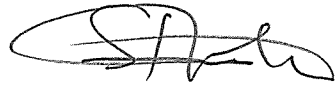
Josue F medelini R

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Ramon Gonzalez

Ramon G. Ortiz

Steve Johnny




Pele Seigato

Pele Seigato

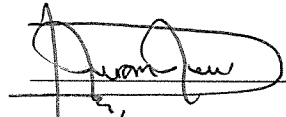
Francis Nansen



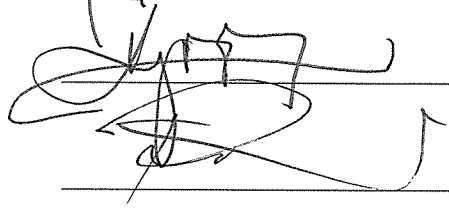
Lael Casal



JUAN JOSE RODRIGUEZ



Ky Nguyen




Zacchin Hene



Juan O. Ortega

Juan O. Ortega

German-villeda



VAIVAI S. MUSAU

Pago Maiava

Lunzo Simion

Salomon Otto

Viki Kerisiano

XUUYEN NGUYEN

Jonathan Taimanu

DUC VO

SANG NGUYEN

PETER LAHI

Jeff W. Koehler

Siakisona Moi

EFFREN P. CAALIM

Hency Graona

FILIPPO KONOTI

PJ PHILLIP

Happy Iona

Nisum

Pago Maiava

Salomon Otto

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PETER LAHI

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EFFREN P. CAALIM

Hency Graona

FILIPPO KONOTI

PJ PHILLIP

Happy Iona

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

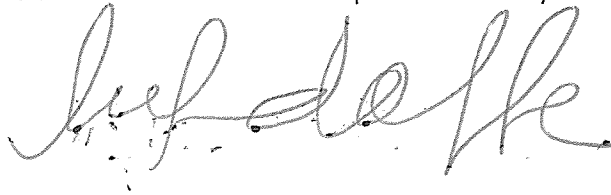
My name is Bob Osta and I work for United States Seafoods on the F/T Vardal as a Processor.
I have worked for US Seafoods for 9 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely



Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is _____ and I work for United States Seafoods on the F/T _____ as a _____. I have worked for US Seafoods for ____ years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Benjamin Ortega and I work for United States Seafoods on the F/T VAERDA as a Processor. I have worked for US Seafoods for 8 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely Benjamin Ortega

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Noi Reynaga and I work for United States Seafoods on the F/T Vasala as a Foreman. I have worked for US Seafoods for 6 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely


Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is JOSE OSUNA and I work for United States Seafoods on the F/T VAELEDA as a processor. I have worked for US Seafoods for 2 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely JOSE OSUNA

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Siv, Sulvan and I work for United States Seafoods on the F/T VAERSON as a combi. I have worked for US Seafoods for 5 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely



Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is MARC VAGO and I work for United States Seafoods on the F/T VASKDAL as a Combi. I have worked for US Seafoods for 4 years and depend entirely on my job to support my family.
(fishing for zo)

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely

Marc Vago & family

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is DAN SMITH and I work for United States Seafoods on the F/T VAKEDAL as a PROCESSOR. I have worked for US Seafoods for 10 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely



Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

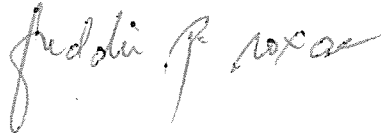
My name is FREDDIE ROXAS and I work for United States Seafoods on the F/T VIKING as a PROCESOR. I have worked for US Seafoods for 4 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely



Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Marios Ch. and I work for United States Seafoods on the F/T Vaerdal as a processor. I have worked for US Seafoods for 10 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely

Marios H. Cabello

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Oslando Torres and I work for United States Seafoods on the F/T Ureval as a processor. I have worked for US Seafoods for 8 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely Oslando Torres

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Joseph and I work for United States Seafoods on the F/T Westal as a processor. I have worked for US Seafoods for 8 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely

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

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Antonio Vega and I work for United States Seafoods on the F/T VAGDAZ as a Processor. I have worked for US Seafoods for 2 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely Antonio Vega

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is BRIAN LANG and I work for United States Seafoods on the F/T VAERDAL as a Deck Boss. I have worked for US Seafoods for 6 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely 

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

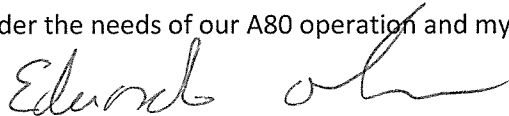
My name is Edvard and I work for United States Seafoods on the F/T VAE 1012 as a ROOK.
I have worked for US Seafoods for ___ years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely



Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

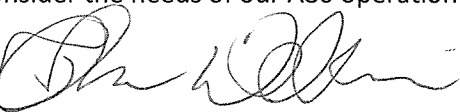
My name is Justin Williams and I work for United States Seafoods on the F/T Vandal as a Cambi. I have worked for US Seafoods for 7 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely,



Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is William and I work for United States Seafoods on the F/T Valer as a Processor. I have worked for US Seafoods for 21 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely

William Torres - S

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Carlos and I work for United States Seafoods on the F/T Voerdal as a Processor
have worked for US Seafoods for 4 years and depend entirely on my job to support my family.

I have heard that the North Pacific Fishery Management Council is considering cutting the halibut bycatch limit substantially for the Amendment 80 sector in the near future. I am worried that a large cut in our halibut would hurt my job and reduce my income greatly. My job is very important to me and my family.

Our captain and crew work hard to avoid halibut. We hate discarding and wasting it, but know that is required by the rules. I also know that it is important to consider other fisheries that depend on halibut. I ask that you think of both the people in the fishery who need halibut to continue in the A80 fisheries and the halibut fishermen as you consider this issue. A solution that keeps us running and helps out their fishery is the right answer.

Please consider the needs of our A80 operation and my family as you work on this issue.

Sincerely Carlos Baca

Subject: C2 Bering Sea Halibut PSC
From: Ken Dole <ken@kendole.com>
Date: 5/15/2015 2:38 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Dear Chairman Hull and NPFMC Council Members,

My partners and I have owned/operated Waterfall Resort in Southern S.E. Alaska since 1983. We bring an average of 2,000 anglers to the state annually. Due to the restrictions on the halibut resource for charter anglers, we have had to shorten our season by almost two weeks in June. We are an expensive option for anglers and due to our size and remote location, we are an extremely expensive resort to operate. In the early weeks of June, when there are only king salmon and one reverse-slot halibut to harvest, it becomes a very difficult value proposition for our guests. We have always maintained in excess of an 85% repeat/referral rate. However, finding those new clients is getting harder and harder.

I would argue that the charter operators in area 2C have taken at least a 70% reduction in our available catch – similar to, or greater than the IFQ holders. The size of the one fish we can harvest is so restricted that, in reality, we can't keep any of the halibut that our guests really want to catch! Why should the charter operators and IFQ holders bear the vast majority of the reductions necessary to maintain a healthy resource? It is time that realistic bycatch limits be placed on the Bering Sea/Aleutian Islands fisheries.

Respectfully submitted,

Ken Dole
Managing Partner
Waterfall Resort
Steamboat Bay Fishing Club

Subject: C2 Bering Sea PSC
From: Dalton Geppert <dalton.geppert@g.kpbsd.org>
Date: 5/15/2015 2:41 PM
To: npfmc.comments@noaa.gov

I am a 16 year old student here in Ninilchik Alaska. I am a sport fisherman for halibut in the Cook Inlet and I believe that bycatch is possibly the worst, unethical way of slaughtering fish and not doing anything with it. i would be very pleased to hear that the bycatch was cut down to 50% or more. Thank you.

Subject: C2 Bering Sea halibut PSC
From: Jordan Finney <jordan.finney@g.kpbsd.org>
Date: 5/15/2015 2:39 PM
To: npfmc.comments@noaa.gov

I am a high school student and I appose bycatching. I believe that bycatching should be brought down to 50% or more.

Subject: c2 Bering sea halibut
From: Caleb Appelhanz <caleb.appelhanz@g.kpbsd.org>
Date: 5/15/2015 2:40 PM
To: npfmc.comments@noaa.gov

I am a high school student and I am aware of by-catch and I would like to see it decrease.

Subject: C2 Bering Sea Halibut PSC
From: Iris Strongheart <iris.strongheart@g.kpbsd.org>
Date: 5/15/2015 2:41 PM
To: npfmc.comments@noaa.gov

My name is Iris Strongheart and I am currently a High School student in Ninilchik, Ak. I am very concerned about the by catch. As the years go by I hear a lot about by catch. I want to be able to see my kids catch their own fish, and if this keeps happening my kids won't be able to because of the fact that people are so careless about OUR fish being killed because companies aren't getting the kind of fish they'd like to be getting. I would like to see this go down by at least 50% or more. If possible, I'd like it to come to a stop.

Subject: C2 Bering Sea PSC

From: "bunnyehlers@g.mail.com" <melissa.ehlers@g.kpbsd.org>

Date: 5/15/2015 2:42 PM

To: npfmc.comments@noaa.gov

I'm Melissa Ehlers, a 16 year old student in Ninilchik Alaska. I've been aware of this bycatch issue and I believe it needs to be stopped. With the amount of halibut thrown over the side dead, the halibut fishery will be much more limited. I'm a deckhand on a charter boat and want my children to have the same opportunities I do. Bycatch needs to be stopped and the halibut fishery can continue.

Subject: halibut bycatch
From: Christopher White <chriswht50@gmail.com>
Date: 5/15/2015 4:09 PM
To: npfmc.comments@noaa.gov

Dear NPFMC–

It is simple. As an IFQ holder, 39 year Alaskan fisherman, my quota has plummeted while the trawl fleet's bycatch has remained unchanged–and exceeded our targeted quotas in 2014. It is simply the right thing to do to cut their bycatch by at least 50%. Anything less is very wrong.

Thanks for doing the right thing.

Chris White
F/V Vulcan



C2 Public Comment (Group 3)
June 2015

2312 NW 98th Street
Seattle, WA 98117

Ph: (206) 782-8822
FAX: (206) 782-9352

www.mcsllcusa.com
Email: chris@mcsllcusa.com

May 15, 2015

Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, AK 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Christine Uyyek and I represent Marine & Construction Supplies, LLC. We provide water-tight doors, hatches, and windshield wiper systems to fishing vessels in the North Pacific and around the world. We value all of our customers and try very hard to help them succeed.

I understand that in June, the North Pacific Fishery Management Council is considering cutting the halibut prohibited species cap for the Amendment 80 sector and would reallocate that halibut to another fleet of vessels. I encourage you to consider the value of the Amendment 80 to my business and others when making this decision.

1. Small businesses—such as the fishing vessels that would be impacted by this reallocation—create diversity and competition, allowing the entire industry to thrive. We have seen throughout history the impacts of large corporations creating monopolies in various industries and how that adversely impacts the consumer.
2. The Amendment 80 fishermen are a large source of jobs and commerce for the Puget Sound. By taking away the amount of fish they can catch, it will no longer be feasible for them to offset the cost of operating the fishing boat. This will mean that the crews, support staff in the business office for each boat, and the various support companies (fuel suppliers, welding shops, metal shops, paint suppliers, marine electronics suppliers, engine mechanics, refrigeration repair, shipyards, etcetera ...) will lose customers. Please do not make decisions that would impact hundreds of businesses and make it difficult for these businesses to grow.
3. Marine & Construction Supplies would lose several loyal customers who have worked with us for years. This would negatively impact our business volume, and impact our ability to stay competitive as a small business in Washington State. Marine & Construction Supplies is finally starting to grow, and work to create job growth in Seattle.

Amendment 80 fishermen are an integral part of the Puget Sound maritime community. Please balance the needs of all our fishermen and strive to develop solutions that can be achieved by the Amendment 80 fleet without significantly curtailing their operations.

Sincerely,
Christine Uyyek
Christine Uyyek

Cc: Senator Patty Murray – shawn_bills@murray.senate.gov & anna_sperling@murray.senate.gov
Senator Maria Cantwell – nicole_teutschel@cantwell.senate.gov
Congressman Rick Larsen – Matt.Bornet@mail.house.gov
Congresswoman Jamie Herrera Beutler – Jordan.Evich@mail.house.gov
Congresswoman Suzan DelBene – ben.barasky@mail.house.gov

Serving the Marine & Construction industry with integrity since 1975

Subject: Bycatch

From: Geoff Widdows <awildfish@hughes.net>

Date: 5/15/2015 4:41 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

I am a 43 year resident of Yakutat, some may say in the very heart of the best halibut fishing in the gulf of Alaska. I know no one that isn't sick to death of the continued waste of this precious resource.

I longlined halibut and black cod for 30 years, wasted NOTHING! I now own a charter boat, have a great repeat clientele, I am at a loss when trying to explain to them why we can catch one fish any size, one baby at no more than 29", can no longer fish on Thursdays, can't do this, can't do that. No rules that have been put in force for several years now make any sense at all. I AM EMBARRASSED! The charter fleet was greatly reduced a few years ago with limited entry, what next? I have lost customers this season because of these ridiculous rules that do nothing to address the real problem. BYCATCH WASTE! That is wrong for the resource and wrong for those who depend on it. PLEASE DO WHAT IS RIGHT.

Geoff Widdows, Yakutat

Subject: C2 Bering Sea Halibut PSC

From: MARK YANAK <yanakman@yahoo.com>

Date: 5/15/2015 5:46 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>,
"Ephraim_froelich@murkowski.senate.gov" <Ephraim_froelich@murkowski.senate.gov>,
"erik_elam@sullivan.senate.gov" <erik_elam@sullivan.senate.gov>,
"bonnie.bruce@mail.house.gov" <bonnie.bruce@mail.house.gov>

Reduce halibut bycatch caps in the Bering Sea/Aleutian Islands by no less than 50%! Only a meaningful reduction will give the halibut fishery and the communities that depend on it the relief they need, as well as restore balance to the conservation efforts in the BSAI fisheries.

☺

Over the past decade, as directed halibut harvest has steadily dropped in response to a declining halibut stock, a major re-allocation of the resource has occurred. Directed halibut fisheries landings have been cut by 63% in the Bering Sea since 2005, but halibut bycatch caps remain at nearly the same level set during peak abundance decades ago. This inequitable standard of conservation has created a stark disparity between halibut fishermen and fisheries that harvest halibut as bycatch in the Bering Sea. In 2014, BSAI groundfish fisheries killed and discarded seven times more halibut (number of fish, not pounds) than the directed fishery landed in the same region! The BSAI halibut fishery is in the midst of a conservation and economic crisis. Not only is the directed halibut fishery facing a possible collapse from bearing the full weight of the conservation effort, but bycatch creates ecosystem-wide impacts across the North Pacific that require immediate action. BSAI halibut bycatch in 2014 came in at roughly one million fish, with an average weight of just under 5 pounds. Tagging studies show that from these large groups of juvenile halibut feeding in the Bering Sea, 70-90% of them are slated to migrate to other areas upon maturity. The removal of large numbers of these juvenile animals from the ecosystem is a critical stock concern for any halibut fisherman or consumer in the North Pacific, from California to Alaska.

Sincerely Mark, Ann, Elizabeth and Allsion Yanak

Subject: Halibut by catch
From: Roger Byerly <anglers@anglerslodge.com>
Date: 5/15/2015 6:45 PM
To: npfmc.comments@noaa.gov

We are sports fisherman and fish for halibut in Cook Inlet. We strongly want you to reduce halibut bycatch caps in the Bering Sea/Aleutian Islands by no less than 50 percent. Only a meaningful reduction will give the halibut fishery and the communities that depend on the halibut fishery the relief they need.

--

Roger and Marlene Byerly
Owners of Anglers Lodge

Po Box 508,
Sterling, AK
99672

907-262-1747
www.anglerslodge.com

Subject: stop trawling
From: "Joe & Angie Christensen" <joeangie@netins.net>
Date: 5/16/2015 4:57 AM
To: <npfmc.comments@noaa.gov>

My name is Joe Christensen, I live in Iowa and I fish (recreationally) in Alaska for halibut.

I as a recreational fisherman and I am very concerned about the high level of by catch of Halibut in the Bering Sea as described in your Final action item C2 - Bering Sea Halibut PSC.

We know that the Bering Sea has a huge population of juvenile halibut and that those halibut migrate from the Bering Sea to other areas throughout the range of the Pacific halibut. Right now the trawl by catch is preventing millions of halibut from leaving the Bering Sea and repopulating other areas. This practice must be curtailed immediately or rural communities will suffer and the future of halibut fishing all over the Pacific will continue to be threatened. These are unacceptable risks to most of the users of this iconic resource to the benefit of a small number of trawl vessel owners and crews. It is one thing to ask all users to conserve a resource, but it is quite another all together to ask most users to sacrifice and conserve the resource to benefit of a specific group of large factory trawlers. That is what is happening and it is not fair or equitable. By Catch not only needs to be reduced and then linked to abundance, so all users can share in the sacrifice and in the benefits of a healthy resource.

Please show everyone you care about the communities and the resource and take significant action to reduce Bering Sea By Catch of halibut to a level that provides opportunity for the rest of us and protects millions juvenile halibut for being caught and discarded.

Sincerely,
Joe Christensen

Subject: Halibut bycatch
From: Kgg55308 <kgg55308@aol.com>
Date: 5/16/2015 6:43 AM
To: npfmc.comments@noaa.gov

Greetings

I would like to voice my anger at the amount of Halibut that are killed and wasted each year! How this can be allowed to continue is beyond all reason. As you well know there have been a staggering amount of cutbacks to the charter fleet as well as the long liners. Is it any wonder why when tons are killed and wasted? I have been coming to Alaska for the last 8 years and spend a lot of money on lodging, gas, car rental, food and so on. Its getting so why bother. I pay 350.00 for a charter and get to keep one decent fish and a runt while the thousands of tons are wasted. I strongly urge you to demand a HUGE cutback in bycatch! as soon as it hits them in the wallet they will figure out a way to stop it but right now there is NO reason to concern themselves with the amount of halibut they kill and waste. Also please make sure they are monitored by a F&G person on every ship. Let the trawlers pay for it. For you as a board to sit back and do nothing while they rape the ocean is ludicrous.

Kevin Gross

Subject: C2 Bering Sea Halibut PSC
From: Fred Matsuno <engiak@yahoo.com>
Date: 5/16/2015 8:16 AM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Hello NPFMC Members,

Please reduce the BS/AI halibut bycatch by 50%! You need to preserve halibut for subsistence, sports, and commercial fishers.

Stop wasting this valuable resource!

Fred Matsuno
Anchorage, AK

Subject: Halibut bycatch reduction
From: "Sea Roamer Charters Mike Reif" <reif@ak.net>
Date: 5/16/2015 8:21 AM
To: <npfmc.comments@noaa.gov>

Hello NPFMC Members,

My name is Mike Reif and I have participated as a captain in the commercial halibut directed fishery for the last 23 years. I will keep this extremely short. Please reduce the BSAI trawl halibut bycatch by at least 50%. For so many reason that many others have already stated and I could reiterate, but will instead summarize but stating **"I is the right thing to do! Do it Now! You are charged with managing the most productive fishery grounds in the world, be responsible and manage it wisely. Stop the waste! Why postpone the responsible decision any longer?"**

Sincerely,
Mike Reif
P.O. Box 2346
Sitka, AK 99835

907-738-6016

Subject: Inquiry from website
From: ME <meco@xyz.net>
Date: 5/16/2015 9:01 AM
To: npfmc.comments@noaa.gov

I have a comment on the NPFMC's upcoming decision on halibut bycatch.

I've been a resident of the great State of Alaska since 1969. I have worked in the fisheries here in a couple of capacities; both as a commercial fisherman (25 years) and for years as the construction manager for APICDA, ending five years ago.

I want to encourage the members of the council to vote for the maximum bycatch reduction possible for the Amendment 80 vessels. I cannot conceive of anyone outside the owners of those protected vessels as being blind to both the injustice and biological madness of allowing the status quo to continue. A six year old, presented the facts of the issue, could hardly fail to come to a correct and just conclusion.

Next, I believe that the court of public opinion will force your chamber to face the reality that bycatch, PERIOD, must be dealt with in an economic and intelligent way. This is a travesty of the highest order and is nothing but a black eye to regulators and fishers, both. I support 100% retention and utilization of all bycatch.

Regards,

Mark Ervice
Homer, AK

Subject: Halibut Bycatch
From: "Mel & Alana" <mlroe@ptialaska.net>
Date: 5/16/2015 9:10 AM
To: <npfmc.comments@noaa.gov>

North Pacific Fishery Management Council

Attention: Dan Hull, Chairman

RE: C2 – Bering Sea Halibut PSC Final action

My name is Mel Roe, I live in Kodiak and I fish both recreationally and as a charter operator in Alaska for halibut.

I as a recreational fisherman and charter operator I am very concerned about the high level of by catch of Halibut in the Bering Sea as described in your Final action item C2 - Bering Sea Halibut PSC.

We know that the Bering Sea has a huge population of juvenile halibut and that those halibut migrate from the Bering Sea to other areas throughout the range of the pacific halibut. Right now the trawl by catch is preventing millions of halibut from leaving the Bering Sea and repopulating other areas.

This practice must be curtailed immediately or rural communities will suffer and the future of halibut fishing all over the Pacific will continue to be threatened. These are unacceptable risks to most of the users of this iconic resource to the benefit of a small number of trawl vessel owners and crews. It is one thing to ask all users to conserve a resource, but it is quite another all together to ask most users to sacrifice and conserve the resource to benefit of a specific group of large factory trawlers. That is what is happening and it is not fair or equitable. By Catch not only needs to be reduced and then linked to abundance, so all users can share in the sacrifice and in the benefits of a healthy resource.

Please show Alaskans you care about the communities and the resource and take significant action to reduce Bering Sea By Catch of halibut to a level that provides opportunity for the rest of us and protects millions juvenile halibut for being caught and discarded.

Sincerely,

Mel Roe
Kodiak Island Adventures

Subject: C2 Bering Sea Halibut PSC
From: "David Stewart" <scrubjay@npgcable.com>
Date: 5/16/2015 9:16 AM
To: <npfmc.comments@noaa.gov>

Sir:

I have been sport fishing in Alaska for the last 12 years, it is perhaps the most enjoyable thing I do in life. During the time I have fished the bag and possession limit on halibut has been greatly reduced and tampered with for non-resident sport fishermen going from 3 per day no size limit down to now 1 per day with a very restrictive size limit. I am all in favor of managing and conserving our resources for the benefit of all. Therefore I am very upset to learn that more halibut is wasted as by catch than is harvested by all sport fishermen combined. This seems very unfair and does not seem to be in the best interest of sustaining the halibut population. Please seriously consider at least a 50% reduction in the by catch cap and perhaps even a small loosening of the regulations regarding non resident bag and possession limits. We out of state sport fishermen contribute significant dollars to the state of Alaska and local communities.

Sincerely
David O Stewart

Subject: by catch
From: James Moody <info@southeastportfishing.com>
Date: 5/16/2015 9:47 AM
To: npfmc.comments@noaa.gov

North Pacific Fishery Management Council

Attention: Dan Hull, Chairman

RE: C2 - Bering Sea Halibut PSC Final action

My name is Jim Moody, I live in Ketchikan Alaska and charter fish in Alaska for halibut.

I as a charter fisherman and I am very concerned about the high level of by catch of Halibut in the Bering Sea as described in your Final action item C2 - Bering Sea Halibut PSC.

We know that the Bering Sea has a huge population of juvenile halibut and that those halibut migrate from the Bering Sea to other areas throughout the range of the pacific halibut. Right now the trawl by catch is preventing millions of halibut from leaving the Bering Sea and repopulating other areas.

This practice must be curtailed immediately or rural communities will suffer and the future of halibut fishing all over the Pacific will continue to be threatened. These are unacceptable risks to most of the users of this iconic resource to the benefit of a small number of trawl vessel owners and crews. It is one thing to ask all users to conserve a resource, but it is quite another all together to ask most users to sacrifice and conserve the resource to benefit of a specific group of large factory trawlers. That is what is happening and it is not fair or equitable. By Catch not only needs to be reduced and then linked to abundance, so all users can share in the sacrifice and in the benefits of a healthy resource.

Please show Alaskans you care about the communities and the resource and take significant action to reduce Bering Sea By Catch of halibut to a level that provides opportunity for the rest of us and protects millions juvenile halibut for being caught and discarded.

Sincerely,
Jim Moody

Subject: Halibut By Catch

From: "Sandy Rollins" <Sandy.Rollins@bearcreekwinery.com>

Date: 5/16/2015 10:24 AM

To: <npfmc.comments@noaa.gov>

As someone who has lived in Alaska for over 38 years in a fishing community I have seen firsthand the tremendous affect this has had on the industry. It has never made sense to me why we would have such horrible waste of Halibut for any reason, let alone for the benefit of a few, most of whom don't even live in Alaska.

Please do something about this before it is too late.

Respectfully
Sandy Rollins

Subject: Halibut by catch in the Bering Sea
From: Stephen Jones <yanert@mtaonline.net>
Date: 5/16/2015 10:35 AM
To: npfmc.comments@noaa.gov

From: Stephen Jones
PO Box 10
Denali Park, AK 99755

I have worked at Dutch Harbor and presently keep a recreational fishing boat in Valdez, AK. I fish for halibut as part of a subsistence/ personal use life style. Keeping fish stocks healthy is paramount to continuing this type of life style.

I am concerned about the high level of by catch of Halibut in the Bering Sea as described in your Final Action item C2-Bering Sea Halibut PSC.

We know that the Bering Sea has a huge population of juvenile halibut and that this population migrates from the Bering Sea to other areas throughout the range of the Pacific Halibut. This helps KEEP the population healthy.

The present practice of by catch is killing a huge number of halibut and if continued will damage the Pacific Halibut population as a whole. This practice must be stopped or rural communities and their lifestyle will suffer as well as the Halibut stock be threatened. This practice benefits very few at the expense of many.

By Catch not only needs to be reduced and then linked to abundance, so all users can share in the sacrifice and in the benefits of a healthy resource.

Please take significant action to protect millions of juvenile halibut from being caught and discarded.

Sincerely,
Stephen Jones

Subject: C2 Bering Sea Halibut PSC in the subject line.

From: Gina Peru Friccero <miss.gina01@gmail.com>

Date: 5/16/2015 10:48 AM

To: npfmc.comments@noaa.gov

It is time to stop the travesty of dragging in Alaska. As a lifelong resident, I have witnessed first hand the devastation this fishery has left in its wake. They have money and power, but this is our country and we live here and fish our small boat for a living. They are stealing our livelihood and its time someone put a stop to this outrageous bycatch while we still have a few stocks left. Please stop this!

Gina Peru Friccero

Subject: c2-bering sea halibut psc
From: Chelsea and Ben Dubbe <bcdubbe@gmail.com>
Date: 5/16/2015 11:31 AM
To: npfmc.comments@noaa.gov

May 16,2015

I have no direct commercial interest in the stocks of halibut being destroyed by the A80 trawl fleet, but I am disgusted by the absurdly short-sighted wastefulness of current by-catch practices allowed by NPFMC. Thanks for your time and consideration.

Sincerely,
Ben Dubbe
Homer,AK

Subject: By pass catch
From: Jsid6g@aol.com
Date: 5/16/2015 12:40 PM
To: npfmc.comments@noaa.gov

there should be some way to stop or at least curve it as that is a lot of small halbit be killed they will not get very larg so we an fishmen can keep them don't know the answer but there has to be a limit . put a limit on the by pass catch an stop all trawl fishing for the year after the limit is meet just an idea William Sidney Anchorage Alaska

Subject: BSAI Halibut PSC Limit Reductions

From: "Tim Tilleman" <Hpdh@arctic.net>

Date: 5/16/2015 2:00 PM

To: <Npfmc.comments@noaa.gov>

CC: "Don Young" <bonnie.bruce@mail.gov>, "Dan Sullivan" <erik_elam@sullivan.senate.gov>, "Lisa Murkowski" <ephrain_froehlich@murkowski.senate.gov>

I would like to add support to the Amendment 80 fleet

Regards, Tim Tilleman
President Hydra-Pro Dutch Harbor, Inc.
907-581-3878 Phone
907-581-3879

— Attachments: —

A80Support.pdf

36.7 KB

Subject: C2 Bearing Sea Halibut PSC
From: Aaron Woods <cootholler@gmail.com>
Date: 5/16/2015 3:55 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

This trawl fishery is wasteful and I support a total ban in Alaska. This is not a sustainable fishery and is ruining our Halibut and Salmon stocks. I am shocked by the by-catch waste. Time to act and ban this fishery second only to high seas drift nets and an argument could be made that they are worse

Sent from my iPhone
Sent from my iPhone
Sent from my iPhone

Subject: Halibut Trawling by catch
From: dean brandt <deanbrandt@yahoo.com>
Date: 5/16/2015 4:49 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

North Pacific Fishery Management Council

Attention: Dan Hull, Chairman

RE: C2 – Bering Sea Halibut PSC Final action

My name is Dean Brandt, My address is 5105 Kingsway Anacortes, WA 98221 and I fish (recreationally) in Alaska and Washington for halibut.

As a recreational fisherman I am very concerned about the high level of by catch of Halibut in the Bering Sea as described in your Final action item C2 - Bering Sea Halibut PSC.

We know that the Bering Sea has a huge population of juvenile halibut and that those halibut migrate from the Bering Sea to other areas throughout the range of the Pacific Northwest. Right now the trawl by catch is preventing millions of halibut from leaving the Bering Sea and repopulating other areas. This practice must be curtailed immediately or rural communities will suffer and the future of halibut fishing all over the Pacific will continue to be threatened. These are unacceptable risks to most of the users of this iconic resource to the benefit of a small number of trawl vessel owners and crews. It is one thing to ask all users to conserve a resource, but it is quite another all together to ask most users to sacrifice and conserve the resource to benefit of a specific group of large factory trawlers. That is what is happening and it is not fair or equitable. By Catch not only needs to be reduced and then linked to abundance, so all users can share in the sacrifice and in the benefits of a healthy resource.

I and thousands of other anglers in the Northwest spend many thousands of dollars in these communities trying to catch these fish and it has been tougher and harder every year to catch them and am very concerned that myself and others will not have a resource to use in the near future unless this is controlled.

Please show The people of the Pacific Northwest you care about the communities and the resource and take significant action to reduce Bering Sea By Catch of halibut to a level that provides opportunity for the rest of us and protects millions juvenile halibut from being caught and discarded.

Sincerely, Dean Brandt

Subject: C2 Bering Sea Halibut PSC
From: Barbara J Ziolkowski <bjziolkowski@comcast.net>
Date: 5/16/2015 8:32 PM
To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>

Please stop BYCATCH method of halibut fishing.

I've enjoyed sport halibut fishing as a visitor to family in Alaska, but this method, "BYCATCH" is a waste and will hurt the sport fishing industry.

Thank you.

Barbara Ziolkowski

Sent from my iPad

Subject: C2 Bering Sea Halibut PSC
From: Holly Van Pelt <hvpmaak@gmail.com>
Date: 5/16/2015 10:53 PM
To: npfmc.comments@noaa.gov

Chairman Dan Hull

North Pacific Fishery Management Council

605 West 4th Avenue, Suite 306

Anchorage, AK. 99501-2252

Re: C2 Bering Sea Halibut PSC

Dear Chairman Hull

I am writing to express my ardent support for the reduction of bycatch by the trawler fleet. I urge you to pass the maximum reduction possible. I have read information that the Canadian trawler fleet has been very successful in limiting their bycatch to a great degree. There is good reason for the American fleet to do the same. All of the directed fisheries affected by the trawler fleet bycatch have taken large cuts because of declining stocks. Please vote to reduce the allowable amount of bycatch to the greatest extent possible.

Sincerely,

Holly Van Pelt
PO Box 3309
Homer, AK 99603

May 17, 2015

Dear North Pacific Fisheries Management Council,

Immediate action needs to be taken with regards to the trawler bycatch cap limits! We are requesting that you reduce the quantity of halibut bycatch in the Bering Sea Aleutian Island Trawl Fisheries by a large amount- no less than 50% or more! We have learned that there is research to support that 13 out of 14 fish will be *wasted* from bycatch in 2015. A travesty! It has been reported to us that the halibut fishery is now in a critical state after continuous stock decline over the last decade mostly due to the wasteful practices of the Bering Sea Aleutian Islands trawl fisheries methods. As the stocks have declined over the last decade, why haven't any regulations been placed on the trawler industry sooner to address the decline and foster a healthy fishery? Why can't other means of harvesting be used, such as pots instead of nets? Other countries have made changes and it improved their stocks. We are requesting that changes in methodology be implemented by NPFMC in the BAI fishery to improve our stocks.

The sport anglers are suffering from this stock decline on a grand scale. Corrective measures must be taken now by NPFMC to pull out of this crisis! We believe that halibut catch limit cuts have, and will continue to have, dramatic affects not only on our fisheries, but on our small businesses, economies of coastal communities and everyone who depends upon halibut in so many ways. Businesses that rely on the fishing industry such as grocery stores, hotels and B&B's, tackle shops, marine repair, and tourism will all be affected by this crisis. Further decline must be prevented for Alaskans!

Regulations to the halibut charter industry have been enacted in recent years yet the halibut bycatch cap limits have not been reduced in 30 years! While we have been fighting to manage our own sport fishery, the trawlers have gotten away with so much desecration and we are hoping that this will begin to change right away, before it is too late! Commercial fishermen have also been trying to manage with their regulations, yet halibut bycatch caps remain at the same level set during peak abundance decades ago and this isn't an accurate portrayal of current stock abundance, so this is an area of necessary adjustment. The inequitable standards of conservation must be remedied. Measures to improve overall stock health should come from where the problem originates in the BAI trawl fishery methods! Big business must work to bring our stocks back to a thriving level.

We urge the NPFMC to listen to our concerns. We care about our industry and all that are affected by what will happen at the NPFMC meeting. Please make the right decision and take strong measures that will return the halibut stocks to a healthy level not only for us but for our future generations to enjoy.

We are watching!

Sincerely,

David and Diane Morris
Bob's Trophy Charters
3978 Homer Spit Rd.
Homer, AK 99603

Subject: RE: halibut bycatch
From: paulaura <paulaura@hotmail.com>
Date: 5/17/2015 9:07 PM
To: npfmc.comments@noaa.gov

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: paulaura
Date: 05/17/2015 8:55 PM (GMT-09:00)
To: NPFMC.comments@noaa.gov
Subject: halibut bycatch

To whom it may concern,

It is a travesty and a shame that management of Alaska's fisheries allows more than 6 million pounds of halibut to be dumped overboard each year as bycatch, in trawl fisheries, which target flounder, rockfish, perch, mackerel and other ground fish.

I strongly support cutting the halibut bycatch level, by at least, and preferably more than 50%, during the North Pacific fisheries management council meetings, during the week of June 1 in Sitka.

I have fished in Bristol Bay for more than 40 years. Thank you very much for cutting the bycatch of halibut of the 28 Seattle - based trawlers by a minimum of 50%.

Paul Frost 727-5265

Sent from my Samsung Galaxy smartphone.

Subject: c-2 bsai halibut
From: George Kirk <fvphantom2@gmail.com>
Date: 5/18/2015 7:36 AM
To: npfmc.comments@noaa.gov

Its way past time to reduce the halibut bycatch cap in both the bsai and goa drag fisheries, commercial halibut fishing is my living, sport and subsistance halibut users also depend on the halibut resource to rebuild, our catch limits have been in steady decline for 14 years. The bsai drag fisheries have not had a change in there bycatch cap in 20 years, there was a lot more in the halibut biomass 20 years ago, its obvious the halibut resource is in trouble, its obvious which user group is not doing its share of conservation. Please reduce the bsai halibut bycatch cap by 50%, the directed halibut fishery is down 70% in the last 14 years. George kirk

Subject: BSAI halibut bycatch

From: "Greg Demers" <gdemers@horizonsatellite.com>

Date: 5/18/2015 8:10 AM

To: <npfmc.comments@noaa.gov>

CC: <ephfrim.frolich@murkowski.senate.gov>, <eric.elam@sullivan.senate.gov>, <bonnie.bruce@mail.house.gov>

I very strongly urge you to reduce allowable halibut bycatch in the Bering Sea/ Alutian Island district by at LEAST 50%. The stocks of this iconic and extremely valuable resource are being decimated in their BSAI nursery grounds before they have an opportunity to disperse throughout the North Pacific. Bycatch reductions are long overdue, and represent a wise step in fisheries management.

Sincerely,
Greg and Carole Demers
Anchor Point, AK

Subject: Fwd: C2 Bering Sea Halibut PSC
From: NPFMC Comments <npfmc.comments@noaa.gov>
Date: 5/18/2015 9:38 AM
To: NPFMC.comments@noaa.gov

----- Forwarded Message -----
Subject: C2 Bering Sea Halibut PSC
Date: Sat, 16 May 2015 09:03:41 -0800
From: Christian Sessom <csessom@alaska.com>
To: npfmc.comments@noaa.gov; npfmc.comments@noaa.gov

We are sports fisherman and fish for halibut in Cook Inlet. We strongly want you to reduce halibut bycatch caps in the Bering Sea/Aleutian Islands by no less than 50 percent. Only a meaningful reduction will give the halibut fishery and the communities that depend on the halibut fishery the relief they need.
Sent from my iPhone

Subject: Fwd: C2 Bering Sea Halibut PSC
From: NPFMC Comments <npfmc.comments@noaa.gov>
Date: 5/18/2015 9:38 AM
To: NPFMC.comments@noaa.gov

----- Forwarded Message -----

Subject: C2 Bering Sea Halibut PSC
Date: Sat, 16 May 2015 10:16:48 -0800
From: Gary Ault <grobault@hotmail.com>
To: npfmc.comments@noaa.gov <npfmc.comments@noaa.gov>

Homer Charter Association

P.O. Box 148, Homer, Ak. 99603

May 16, 2015

The Homer Charter Association (HCA) is an organization representing 31 charter companies and associated businesses from the Homer area. Its mission is to preserve and protect the fishing rights and resources necessary for the Homer charter fleet to best serve the recreational fishery. The Homer Charter Association submits the following comments on C2 Bering Sea Halibut PSC issue before you at this meeting.

The proposed reduction of BSAI halibut bycatch is absolutely essential to the halibut resource rebuilding itself to sustainable levels. We are talking about saving a species of fish that thousands of Alaska small businesses rely on for some or all their income.

Hundreds of charter fishermen have seen an array of one fish, one-and-a-half fish, and certain size limits during this period. In 2014 the guided sport anglers in area 3A saw a

40% reduction in there allocation in just one year without regard for the economic impacts incurred by the small businesses directly effected. We believe it is time to help save the halibut fishery for all user groups by reducing bycatch by 50% in the Bering Sea Aleutian Islands area.

Charter captains are responsible for every halibut caught and retained or released with logbook reporting requirements that are submitted weekly. They are responsible for the release mortality that my or may not occur and the guided sport fish allocation is reduced accordingly. "Every fish counts" is the law for all user groups except for the factory longliners and factory trawlers in the BSAI.

Why is more of the halibut resource wasted in the Bering Sea than landed and sold? Thirteen out of fourteen fish in the central Bering Sea will be wasted next season. Overall the entire Bering Sea will only have 2.4 million pounds of halibut that can be sold in 2015 while over 6 million pounds will be killed and thrown overboard as bycatch. If bycatch caps remain unchanged, we could see a stark disparity between bycatch and directed halibut harvest.

The Homer Charter Association requests that the NPFMC take the actions necessary to achieve a 50% reduction in Bering Sea Halibut PSC.

Thank You for your consideration.

Gary Ault, President Homer Charter Association.



Mr. Dan Hull
Chairman, North Pacific Fishery Management Council
605 West 4th, Suite 306
Anchorage, Alaska 99501-2252
npfmc.comments@noaa.gov

Subject: BSAI Halibut PSC Limit Reductions

Dear Chairman Hull,

My name is Haukur Johannesson and I represent Marel Seattle Inc. We provide Weighing and processing equipment to fishing vessels in the North Pacific and around the world. We value all of our customers and try very hard to help them succeed.

I understand that in June the North Pacific Fishery Management Council is considering cutting the halibut prohibited species cap for the Amendment 80 sector and would reallocate that halibut to another fleet of vessels. I encourage you to consider the value of the Amendment 80 fleet to my business and others when making this decision.

If the NPFMC chooses to reduce the halibut bycatch for the amendment 80 fleet, it will greatly affect the revenue of the fleet. This will result in reduced wages in all of their crew.

I believe this will also halt the future of new construction of vessels, which is in desperate need of updating.

Marel normally does a lot of work with the amendment 80 fleet in the offseason, and at times perform major overhauls on their factories. If the council chooses to reduce the Halibut bycatch for this fleet, it will greatly affect our business, as well as a lot of others from the Puget Sound area.

Amendment 80 fishermen are an integral part of the Puget Sound maritime community. Please balance the needs all of our fishermen and strive to develop solutions that can be achieved by the Amendment 80 vessel without significantly curtailing their operations.

Sincerely,

Haukur Johannesson

Marel Seattle Inc.

2001 West Garfield, Terminal 91 Bldg. A-1, Seattle, WA 98125

- Forwarded Message -----

Subject:C2 Bering Sea Halibut PSC

Date:Sat, 16 May 2015 09:03:41 -0800

From:Christian Sessom <boazsessom@gmail.com>

To:npfmc.comments@noaa.gov <npfmc.comments@noaa.gov>

We are sports fisherman and fish for halibut in Cook Inlet. We strongly want you to reduce halibut bycatch caps in the Bering Sea/Aleutian Islands by no less than 50 percent. Only a meaningful reduction will give the halibut fishery and the communities that depend on the halibut fishery the relief they need.

Sent from my iPhone