

The Council's December 2012 action directed the pollock industry to develop proposals for including "Western Alaska chum bycatch salmon bycatch avoidance measures" in their current incentive program. This process has delegated action on this agenda item to the pollock industry, thereby creating a process in which Western Alaska groups are not included. Only through the Council process is any means of public review and participation possible. It is critical to the potential success of this type of approach that all stakeholders are included early in the process of program development. To this end, we ask the Council to schedule an update from industry on program development and proposals for chum salmon bycatch avoidance measures for the April 2013 meeting.

Sincerely,



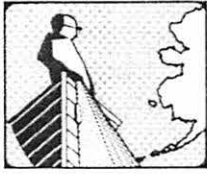
Karen Gillis, Executive Director
Bering Sea Fishermen's Association



Melanie Bahnke, President
Kawerak



Rebecca Robbins Gisclair, Policy Director
Yukon River Drainage Fisheries Association



**Bering Sea Fishermen's
Association**



Kawerak, Inc.



January 29, 2013

Mr. Eric Olson, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Dr. Jim Balsiger, Regional Administrator
NOAA Fisheries, Alaska Region
PO Box 21668
Juneau, AK 99802

Re: Agenda Item D-2 Staff Tasking - BSAI Chum Salmon Bycatch

Dear Chairman Olson, Dr. Balsiger and Council members:

We are submitting these comments on behalf of the Bering Sea Fishermen's Association (BSFA), Kawerak and the Yukon River Drainage Fisheries Association (YRDFA). BSFA is a non-profit extension service organization serving the needs of Western Alaska commercial and subsistence fishermen. Kawerak is the tribal consortium in the Bering Strait region of Alaska, where there are 20 federally recognized tribes. YRDFA is an association of commercial and subsistence fishers on the Yukon River. We appreciate the opportunity to comment on staff tasking regarding scheduling for discussion of BSAI chum salmon bycatch. **We ask that you schedule an update from industry on program development and proposals for chum salmon bycatch avoidance measures for the April 2013 meeting.**

We appreciate the Council's ongoing efforts to address chum salmon bycatch in the Bering Sea pollock fishery. We understand the complexities of the action, particularly as it relates to concurrent efforts to reduce Chinook salmon bycatch. However, we are deeply concerned that the consequence of the Council's action at the December 2012 Council meeting appears to have delayed review of the chum salmon bycatch agenda item until the October 2013 Council meeting. Chum salmon stocks are currently healthy in most of Western Alaska, with the exception of Norton Sound where chum stocks remain listed as a stock of concern. However, these runs are highly cyclical and it is imperative that we have management measures in place which will consistently reduce bycatch of Western Alaska chum salmon to protect these runs. This is critically important in these times of Chinook salmon shortages: communities are relying on chum salmon for basic sustenance, and it's essential that protections are in place.

considering rising fuel costs and decreasing TAC. Furthermore, this proposal benefits all 2nd generation fishermen in Alaska, Oregon and Washington alike, thus satisfying National Standard 4 of the MSA, which states "conservation and management measures shall not discriminate between residents of different states." Considering the fact that CQEs will continue to out compete 2nd generation fishermen in the following ways: tax exemption, no owner on board requirements, higher ownership caps and no vessel class restrictions, we feel this proposal is fair in attempting to bring equality to all 2nd generation fishermen in the halibut and sablefish fisheries.

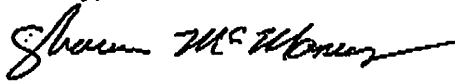
In closing, the intent of our proposal is to spread entry level opportunities, socio economic benefits and conservation minded sustainable harvest methods across the entire group of 2nd generation fishers as well as coastal communities.

Alternative Solution 1: 2nd generation fishers be allowed to own 10 halibut blocks and 5 sablefish blocks as is currently the benefits/regulations for CQEs.

Alternative Solution 2: Increase ownership of 3 halibut blocks and 2 sablefish blocks for 2nd generation fishers to a maximum of 1% of available blocks per regulatory area not to exceed the current individual ownership cap.

Alternative Solution 3: Do nothing, leave the regulations as they are, thus severely hampering all 2nd generation fishers ability to become owner/operators, while continuing to violate MSA National Standard 4, which furthers the unequal advantages currently held by CQEs.

Sincerely,



Shawn McManus, Vice President
Deep Sea Fishermen's Union

Deep Sea Fishermen's Union of the Pacific

5215 Ballard Avenue N.W.
Seattle, WA 98107

Phone: (206) 783-2922



Fax: (206) 783-5811

www.dsfu.org



Established 1912

January 28, 2013

North Pacific Fishery Management Council
605 W. 4th Ave.
Suite 306
Anchorage, AK. 99501

Subject: Deep Sea Fishermen's Union 2nd generation IFQ block limit increase proposal.

Dear Chairman Eric Olson:

The Deep Sea Fishermen's Union is a one hundred and one year old organization representing the labor of hardworking fishermen employed in the fixed gear fisheries of Alaska and the West coast. Our proposal concerns increasing the two block limit currently enforced in the sablefish IFQ fishery and the three block limit currently enforced in the halibut IFQ fishery. We ask that these block increases be applied to 2nd generation non initial IFQ recipients only. We would also clarify that the unblocked/blocked statuses of IFQ remain unchanged so as not to affect the rules currently governing 1st generation ownership.

Objectives of Proposal: Allow 2nd generation IFQ recipients to closely mirror the block ownership privileges already established for CQEs of ten halibut blocks and five sablefish blocks. At present, an individual can own two blocks of sablefish quota per fishing area or three blocks of halibut per fishing area. Second generation fishermen are being hampered by these rules. While the stock in most areas has declined over recent years, the ex-vessel price of fish has continued to increase. As a result, the cost of quota in these areas has continued to rise as well. The rising costs of IFQ make it increasingly difficult for 2nd generation fisherman to obtain loans especially given today's financial constraints in the banking industry. Typically, blocked parcels of quota are smaller in poundage than their unblocked counterparts. As a result, 2nd generation fisherman are limited in the ability to accumulate quota. Additionally, fishermen are hesitant to buy very small blocks of quota because of the two/three block rule.

Foreseeable Impacts of Proposal: This proposal could create more quota or liquidity in the market place thus allowing 2nd generation fishermen the ability to accumulate quota unhampered up to the new block and existing individual cap. We realize that the price of Unblocked and Blocked quota would eventually balance out. Additionally, this proposal would allow 2nd generation IFQ holders the ability to consolidate enough poundage to make an economically viable trip, especially

Deep Sea Fishermen's Union of the Pacific

5215 Ballard Avenue N.W.
Seattle, WA 98107
Phone: (206) 783-2922
Fax: (206) 783-5811
www.dsfu.org



Established 1812

January 28, 2013

North Pacific Fishery Management Council
605 W. 4th Ave.
Suite 306
Anchorage, AK. 99501

Subject: (D2) Staff Tasking February 6-12, 2013 Meeting - Deep Sea Fishermen's Union request to place agenda item C-3(B) Removing the CQE Small Block Restriction from the December Council meeting under staff tasking for the February Council meeting in Portland, OR.

Dear Chairman Eric Olson:

The Council reviewed a discussion paper concerning removing the CQE small block restriction at the December Council meeting. The Council has now sent forward a motion recommending the initiation of an amendment package to expand CQE quota share purchase opportunities. The following are the three alternatives the Council recommends for analysis in addition to the status quo:

- Allow CQE communities to purchase any size block of halibut and sablefish quota share.
- Allow CQE communities to purchase any size block of halibut and sablefish quota share only from residents of any community.
- Allow CQE communities to purchase any size block of halibut and sablefish quota share only from residents of their CQE community.

It is the understanding of the Deep Sea Fishermen's Union that initial and final action on this agenda item will take place at the June Council meeting in Juneau. We feel that initial and final action taking place at the same Council meeting leaves very little time for input or consideration from industry. In addition to further discussion on this motion, the Deep Sea Fishermen's Union kindly requests that the attached proposal be included as an alternative in the amendment package for review.

Regards;

A handwritten signature in cursive script that reads "Shawn McManus".

Shawn McManus
Vice President,
Deep Sea Fishermen's Union

attachment

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: D-2 STAFF TASKING

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	TERRY HAINES	CREWMENS ASSOCIATION
2	Simeon Swetzof Jr	F/U WIND DANCER
3	Jim Stone	Alaska Scallop Assoc.
4	Shawn McManus + Brian Harber	Deep Sea Fishermens Union
5	BETH Stewart	Peninsula Fishermen's Coalition
6	Chad See	Freezer Lining Coalition
7	Karen Montoya	Aleutia
8	Lori Swanson	Groundfish Forum
9	Frank Kelly	Ukhalaska
10	Sarah Nelson	AFSA
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.