

# ALASKA BOAT COMPANY, LLC

Alaska Rose  
Bering Rose  
Destination  
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Great Pacific  
Messiah  
Sea Wolf  
Aleutian No 1

April 3<sup>rd</sup>, 2023

Chairman Kinneen  
North Pacific Fishery Management Council  
1007 West Third Ave., Suite 400  
Anchorage, AK 99501-2252

## **RE: C-2 Salmon Bycatch Reports**

Dear Chairman Kinneen and North Pacific Fishery Management Council Members,

Thank you for the opportunity to provide comment on the efficacy of bycatch management programs currently utilized by the Bering Sea pollock fishery as well as the potential impacts of the alternatives proposed by the Salmon Bycatch Committee (SBC).

Alaska Boat Company and its fleet of five AFA shoreside trawl CV's are jointly owned by two CDQ groups. These vessels are members of the Unalaska Fleet Cooperative and deliver their catch to Alyeska Seafoods in Unalaska, AK.

Given the nature of our ownership we do not take bycatch issues lightly and have implemented a variety of measures in addition to our participation in in the Shoreside Salmon Savings Incentive Plan Agreement, as well as the Non-Chinook Salmon Rolling Hotspot Agreements. By no means is this a comprehensive list but rather a credit to the variety of tools at our disposal when it comes to addressing our bycatch concerns.

*- Voluntary compliance with all avoidance or closure areas released by Sea State Inc. regardless of vessel tier status.*

*-Participation in experimental gear research*

- 1) two cycles of Salmon Excluder EFP's*
- 2) SafetyNet Technologies Lights pilot study*
- 3) Regular cameras use to ensure proper function/hang of salmon excluders*

*-Full time employment of an on-site coop manager serving two primary functions.*

- 1) Maintain the cooperative's compliance with catch accounting and other regulatory measures.*
- 2) Provide daily assistance to our fleet regarding bycatch avoidance in trip planning preparations*

*-Vessel crews do not share in fuel costs. We acknowledge the significant costs associated with bycatch avoidance and have removed this factor from the decision-making process.*

Moving forward we understand that the Council is faced with addressing a variety of user groups as well as operational types. We support the SBC's draft purpose and need statement with particular attention to the following language:

*“Recent genetics stock composition information indicates that the majority of non-Chinook bycatch in the pollock fishery is of non-domestic hatchery origin; therefore, alternatives should structure non-Chinook bycatch management measures around improving performance in avoiding Western Alaska chum salmon specifically.”*

*“The Council intends to... provide additional opportunities for the pollock trawl fleet to improve performance in avoiding non-Chinook salmon while maintaining the priority of the objectives of the Amendment 91 and Amendment 110 Chinook salmon PSC management program...”*

*“...take into account the importance of fishery resources to fishing communities including those that are dependent on Bering Sea pollock and subsistence salmon fisheries as required under National Standard 8; and to achieve optimum yield in the BSAI groundfish fisheries on a continuing basis, in the groundfish fisheries as required under National Standard 1.”*

In consideration of the elements listed above from the SBC’s draft purpose and need statement we identified a few areas of clarification in the SBC’s suite of alternatives.

The 2022 preliminary report on chum salmon genetic stock composition identified key spatial and temporal differences between stocks of origin. Notably that despite an overall reduction in chum bycatch for 2022 that the proportion of Western Alaska stocks was the largest in the 10 year time series.<sup>1</sup> Therefore, reductions of chum bycatch are not directly correlated with reductions of Western Alaska non-Chinook bycatch and metrics being considered under the Alternatives for future analysis should account for this key difference.

We would also like to note the differentiation between bycatch rates and bycatch numbers. When operating at the 3000’ level, the spatial and temporal differences in bycatch and genetic stock of origin are helpful tools, but our fleet bases daily fishing plans on rates. Evaluating performance on ‘number’ alone has the potential to create unintended consequences.

**For Example:**

**Location 1:** *The F/V Alaska Rose tows for 5 hours near 165 ° long. and hauls back a 15mt bag with 5 salmon in it. This is a bad tow and they will not return to this location.*

*N=5 chum and Rate= 0.3333 chum/MT*

**Location 2:** *The F/V Alaska Rose moves to a location closer to the 165 ° long. and tows for 5 hours for a 100mt bag with 5 salmon. This is comparatively a much better tow and they will return here*

*N=5 chum and Rate= 0.05 chum/MT*

**Season Overall:** *Assuming conditions remain consistent, after making eight additional tows in Location 2, the F/V Alaska Rose will have landed a grand total of 915 MT of pollock catch:*

*Overall: N = 50 chum and Rate= 0.055 chum/MT.*

*Location 1: N=5 chum and rate=0.3333 chum/MT*

*Location 2: N=45 chum and rate=0.05 chum/MT*

***By focusing solely on number, Location 1 appears better when in reality, its bycatch is 6x worse.***

<sup>1</sup> Genetic Stock Composition Analysis of Chum Salmon from the Prohibited Species Catch of the 2022 Bering Sea Walleye Pollock Trawl Fishery, Preliminary Report; Pg. 2

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Lastly, while the state of Western Alaska salmon stocks demands immediate action, there are long-term timing issues associated with taking regulatory action. Although an IPA/RPA structure could serve to address these issues in a shorter time frame, careful consideration would be needed to prevent conflicts between Chinook and non-Chinook avoidance as they are currently written.<sup>2</sup>

In sum, the SBC's reports identified key differences in evaluating the success of bycatch measures, both between user groups as well as within industry. Given each of the previously mentioned considerations along with the sensitive cultural and economic nature of this issue, Alaska Boat Company would urge the council to incorporate a wide variety of alternatives and approaches to best inform future analysis.

Thank you for your Consideration,

Caitlin Yeager  
General Manager  
Alaska Boat Company

<sup>2</sup> *Salmon Bycatch Committee Report, January 25, 2023; Pg. 3*