

David Axmaker

Owner/ operator - F/V Maranatha

1/31/2018 9:47:07 AM

I have been fishing commercially and living in Alaska for over 50 years. Last season we lost the opportunity to catch 30,000 + chinook because of conservation concerns and are facing more lost time this coming season which is going to be devastating to fishermen in southeast communities. Please do not increase the bi catch limits on chinook. The present data shows only 15% of southeast salmon are being caught but that is not from 100% sampling. Even 15% can make a huge difference on what makes it back to the rivers. So again, while these stocks are in the process of being rebuilt I urge you not to increase the allowable catch. Thank-you

Chris Guggenbickler

2/1/2018 9:21:31 AM

As a third generation commercial fishermen I would like to voice my opinion that I am adimately opposed to increasing bycatch limits. I just experienced a Board of Fisheries meeting where all user groups take of Chinook were reduced. The majority of the Chinook systems in Southeast Alaska have not been meeting minimum escapement levels. For these reasons it would be irresponsible to increase bycatch for the trawl fleet, on the contrary the trawl fleet bycatch levels should be reduced just like every other user group. I also longline for halibut and sablefish and want to voice my frustration with bycatch of these species as well.

Adam kohne

Owner operator

2/2/2018 6:30:43 AM

Absolutely ridiculous to even consider increasing the trawl by catch of chinook. Especially when it is in danger as it is. Please reconsider and think of the small operations and family's tha will suffer.

James Hunter Jensen

2/2/2018 8:30:45 AM

I am not in favor of this increase. We are having a tough time surviving as fishermen and subsistence is poor all across the state of Alaska. We cannot afford an increase in any fishery that reduces King numbers to user groups who have all taken cuts to try to increase these very numbers. I just don't see the logic here.

Glenn Israelson

Fisherman

2/1/2018 8:55:49 PM

Absolutely no! There should be no increase in the allowable bycatch for GOA. How can this even be considered when southeast fishermen are having their winter troll season cut short, spring fisheries

reduced and severe restrictions being put on the entire region as a result of low chinook returns. I suggest the trawl fleet share the pain with us and get a reduction in the amount of allowable bycatch instead.

Casey Mapes

Commercial fisherman

2/1/2018 9:08:50 PM

I wish to speak out against any increases to GOA bi-catches of any species in the trawl fishery, particularly chinook. I was at the BOF meeting in Sitka, and I saw the devastation on the faces of people from communities that lost nearly everything. 5 rivers were put on the stock of concern list, while still others were deeply considered for it. Though I don't live in one of the communities most affected, trolling which I am heavily dependent upon for a large portion of my income, took heavy cuts. 6 weeks lost from the winter fishery, spring curtailed severely in many areas. This equates to millions lost to the troll fleet I am a part of. In my community of Yakutat, we have stared down the barrel of the stock of concern for years now. Our Chinook runs have been Barely making it. Two years ago, we had 170 returning adult chinook to the Situk River, total. I understand the perspective that they only claim that 15% of their bi-catch is Alaska fish, but that still is 1000's of fish. At a time this critical, everyone should be pain sharing. We are in a desperate fight for the very survival of our communities, and the prolonged existence of our chinook runs in our rivers. In addition to this, I firmly believe you should be considering other species that are in deep trouble they also affect. 80% of the GOA Pacific cod population is gone, other communities are suffering greatly from this, we just don't need any more bi-catch/waste of anything. Thank you for considering my concerns on this matter.

Mark Sappington

Charter & Commerical fisher

2/1/2018 9:14:51 PM

Dear Board, I am a charter fisherman. I am dependent on the well being of many different species, the same species that trawlers kill and through overboard. I am also a troller, with a focus on winter kings. In that fishery I am no longer paying my bills, as well, our entire community is suffering. Nearby communities have lost so very much, and Yakutat seems to on that chopping block now as well. Not only do the trawlers in the Non Pollock fleet deep to not get an increase in PSC number, but they need to have deeper cuts. Please Cut those numbers. Please, we are begging you. Please recognize that the trawl fleet is a big part of the problem. Please do the right thing.

James Carter Hughes

self

2/2/2018 1:27:08 PM

Chairman Hull and members of the North Pacific Fisheries Management Council: My name is Carter Hughes and I am a Sitka based troller. I also have small amounts of sablefish and halibut IFQ that I fish in the Southeast Alaska management regions. I have been in the fishing industry since 1984, primarily fishing in the SE AK region although I have worked on vessels that have fished out the Aleutian Is to Kiska and north to the Pribilof Is in the Bering Sea in the past. I'm sure some of you have seen me testify before the NPFMC in the past. I am sending the following comments on Agenda Item C3 GOA Non-Pollock Trawl Chinook PSC

Limits. I am opposed to any increase in Chinook bycatch allowance for the non-pollock trawl fisheries. I assume that all of the Council is aware that three SE AK chinook stocks were listed as stocks of concern by the AK Board of Fisheries last October after the Alaska Department of Fish and Game requested the action. All directed chinook fisheries in SE AK are under varying degrees of restrictions for chinook. This is particularly true of the troll and sport fisheries. Almost all chinook bearing river systems in AK are experiencing underperformance in chinook stocks and any increase in chinook take by any group is not appropriate at this time. I support Alternative 1, no action. I would support a reduction but that is not an option. Having experienced the trawl sectors aggression towards small boat fisheries and the Prohibited Species they claim to require as bycatch from the small boat fleets that target halibut, I am not surprised that there is a request to increase PSC of chinook salmon while the fleets that target them are expected to take large cuts. I hope that the AK contingent of the NPFMC can appreciate that this is your back yard too and vote to hold the status quo (Option 1). I have only had 1 day to review the two lengthy reports on chinook PSC in the non-pollock GOA fisheries. It looks to me like trawl bycatch has significant impact on AK chinook stocks and a lot of uncertainty exists in the current study. Now is not the time to increase chinook bycatch levels. Thank you very much for reading my comments. James Carter Hughes FV Astrolabe, Sitka

Adam Hackett

Hackett, Adam

1/30/2018 8:44:39 PM

My business and family have taken significant cuts to our income due to recent Alaska Board of Fish actions taken to protect Chinook Salmon. Not only is our 2018 income hurt, but the value of our vessel and permit are likely to be impacted in the long run. In Southeast Alaska we have several Chinook stocks that are being managed extremely conservatively as they have been identified as stocks of concern. At sea survival is one of the major issues sighted by biologists as a likely cause for this situation... trawl bycatch clearly impacts at sea survival. This is no time to increase allowable by catch limits of Chinook Salmon; all user groups are making great efforts to conserve them. It would be ludicrous to not extend these protections to GOA catcher vessels. Adam, Lexi, Isla and Leo Hackett

David Landis, General Manager

Southern Southeast Regional Aquaculture Association

2/1/2018 11:16:18 AM

Southern Southeast Regional Aquaculture Association (SSRAA) is an Alaskan non-profit organization, incorporated in 1976 with a mission to enhance and rehabilitate salmon production in Southeast Alaska to the optimum social and economic benefit of salmon users. SSRAA opposes any increase in existing PSC limits for chinook salmon in GOA CV fisheries. In part, these fish are some of the 3 million chinook that SSRAA rears and releases from our hatchery facilities in SE Alaska. Due to poor ocean survivals of chinook coast-wide, coupled with ADF&G Stock of Concern designations in the large transboundary rivers in our region, the Alaska Board of Fisheries has mandated management actions that severely restrict access to these fish by all SE Alaska users. These actions are of grave concern to the 21-member SSRAA Board of directors and the nearly 4,000 SE Alaska commercial salmon permit holders and 70,000+ SE residents. We all depend on these fish, and they are at a critically low point in the historical records. All users of the chinook resource have taken severe cuts, brought to a head during the agonizing weeks-long Board of Fisheries meeting in Sitka this month. To contemplate any incremental increase in the GOA CV catch of these same fish is extremely disturbing, exceptionally harmful, and would ultimately be counterproductive

if allowed to occur. Please take these words to heart: There should be absolutely no increase in chinook catch by Gulf of Alaska Catcher Vessels. Thank you for your time and attention to this matter.

Sam L Demmert

2/1/2018 11:40:36 AM

I have a serious problem with the Chinook Salmon Cap Adjustments. With king salmon stocks in rapid decline up and down the Pacific coast, we as residents and prime users both commercially and as a food source, have been continually cutting back on our use as a food source and a means of income. Our primary goal is preservation and insuring healthy stocks of Chinook Salmon. When the Eastern Gulf of Alaska trawl fishery is allowed to bycatch more than the targeted amount of the entire hook and line fishery, it presents a serious problem with conservation. Any increase in the allowable bycatch, should not be permitted. In my estimation, it should be reduced. If the allowable chinook bycatch is reached to soon, that is a pretty good indication that they are in a chinook salmon rich area that should not be fished. While strict conservation measures are being taken by one fishery and being defeated by another. Thank you for your time and consideration.

Joel Randrup

Fisherman

2/2/2018 2:03:43 PM

To North Pacific Fisheries Management Council, I am a commercial fisherman and I live in Petersburg, Alaska. I gillnet for salmon, pot fish for Dungeness crab, and participate in the herring pound fishery as well as crew for other fisheries throughout the year. I am a stakeholder for the inside waters fisheries. Next week you will be considering management measures to possibly increase the Prohibited Species Catch (PSC) for the catcher vessels (CV) in the trawl fisheries persecuted in the Gulf of Alaska (GOA). The Chinook salmon (*Oncorhynchus tshawytscha*), is a species of fish that is having difficulty meeting the escapement levels in several stream systems in Southeast, and may have more issues in coming years. It is for this reason as well as conservation measures that are going to be implemented by the Alaska Department of Fish and Game (ADFG) during the 2018 salmon season that I recommend that you adopt alternative 1, no action. The Chinook salmon is at historic low numbers for some of the stream systems and cannot withstand increasing the catch rate even if staying within the PSC limit set in regulation. A theme during the Board of Fish (BOF) meeting that concluded January 23, 2018 in Sitka, Alaska was that we all had to share in the conservation of Chinook salmon in Southeast. Fishermen will continue to be managed for conservation during this low recruitment period for the Chinook salmon until their numbers start to increase and escapements are met. At this meeting the BOF adopted action plans for the conservation of Chinook salmon in several streams in southeast. In other words, until the numbers of Chinook salmon increase, the Southeast area salmon fishermen are going to share in the loss of fishing time and/or area. I ask that you consider sharing in that conservation by not increasing the PSC for the Chinook salmon caught in the trawl fisheries and choose alternative 1, no action. Thank you for your consideration of this matter. Sincerely,
Joel Randrup

Paul Olson

self

2/2/2018 4:44:49 PM

North Pacific Fishery Management Council: The new information that should have the most bearing on the Council's decision with regard to Chinook PSC limits in the Gulf of Alaska should be the recent decline in Southeast Alaska Chinook stocks. The analysis does not adequately cover this issue - even though ADF & G closed a directed fishery in August 2017 and issued an action plan for stocks of concern in December 2017. I support the no action alternative and submit that the Council should terminate any further work on this agenda item. The Council's rationale for establishing the existing limit in 2013 to address poor escapements of Alaska Chinook populations intercepted in the trawl fishery is even more compelling now with the precarious status of southeast Alaska Chinook stocks. Southeast Alaska commercial and guided sport fisheries are facing significant restrictions in 2018 in order to allow for the escapement of very small numbers of fish. If the Council does move forward with further analysis, it needs to include materials presented by ADF & G at the January 2018 Board of Fish meeting pertaining to Southeast Alaska Chinook stocks. Also, it is odd that NMFS would propose only two alternatives that increase Chinook PSC. This approach violates NEPA because NMFS has a substantive obligation to minimize bycatch under National Standard 9. Further analysis should include an alternative that reduces Chinook PSC, such as the 5,000 fish limit considered in the 2013 analysis. Also, NEPA requires environmental analyses to identify inconsistencies with state laws. How can an increase in Chinook PSC in the Gulf of Alaska be consistent with Alaska's Sustainable Salmon Policy? In sum, the Council should not take action on this issue given the status of Southeast Alaska Chinook stocks. Any further action should include an alternative that provides for: (1) a 5,000 fish limit and (2) an agency or industry funded plan that ensures a census of Chinook taken in the Gulf of Alaska fisheries to address uncertainties stated in the analysis.

Mara Lutomski

Petersburg Chamber of Commerce

2/2/2018 5:19:02 PM

We, at the Petersburg Chamber of Commerce, are opposed to any alternative that would increase the existing Chinook salmon PSC limits for non-pollock trawl CV's and CV's fishing under the authority of a central GOA Rockfish program cooperative quota permit. ADF&G and the Board of Fisheries has listed 3 Chinook salmon stocks of concern in the Southeast and several more runs are receiving severe restrictions in hopes that the salmon run can rebound and at minimum, meet their escapement goals. Commercial and Sport fisheries in districts 8, 11, and 15 are being restricted in an effort to protect the already dwindling stocks. ADF&G has stated that the indicators show that something is happening to these stocks on the outside waters. An increase in by-catch allowance would add undue pressure to an already struggling stock. The Petersburg Chamber of Commerce has held a King Salmon derby in our area (district 6 & 8) for the past 36 years, this year we voluntarily cancelled a derby that is an economic driver for local businesses and a fundraiser for our chamber BECAUSE of our concern for the stocks. We all want salmon to be around for years to come, and we all must do our part. We oppose increasing the existing Chinook salmon PSC limits for non-pollock trawl CV's and CV's fishing under the authority of a central GOA Rockfish program cooperative quota permit trawling in the Gulf of Alaska, while fisherman, sport and commercial, are being restricted on the inside waters. We all must play a roll in relieving the pressure put on the Chinook salmon stock so that it has a chance to one day return to healthy and abundant state. Please do not vote in favor of an increase or any alternative that would create an increase. Respectfully, Mara E Lutomski Director, Petersburg Chamber of Commerce

Max Worhatch

United Southeast Alaska Gillnetters

2/2/2018 3:29:15 PM

North Pacific Fishery management council members-

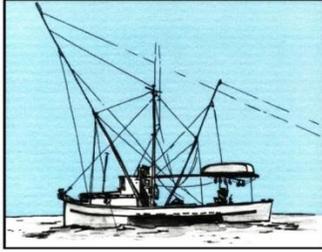
United Southeast Alaska Gillnetters represents the interests of 473 independent businesses operating in southeast Alaska. At the last Board of Fisheries meeting, we had three southeast rivers, the Chilkat, King Salmon and Unuk, listed as stocks of concern for chinook. As a result, we have been saddled with restrictions that will dramatically affect our bottom line. We have also seen restrictions in time and area in districts 8, 11, and 15 for the Stikine, Taku, and Chilkat the last two seasons. Nine of eleven indicator systems for chinook did not meet escapement goals in our region. Commercial troll and sport fish have also seen draconian conservation measures throughout the region.

For these reasons, we are adamantly opposed to any alternatives that would increase the existing Chinook salmon PSC limits for non-pollock trawl CVs, and CVs fishing under the authority of a central GOA Rockfish Program cooperative quota permit.

It is our understanding that genetic sampling of stocks of origin for chinook bycatch in GOA trawl fisheries indicate 15% of southeast origin. Given the poor state of the southeast rivers, it would seem irresponsible to consider raising limits at this time. In fact, it would seem more prudent to reduce the limit while fishermen who are dependent on those runs are sitting on the beach in an effort to rebuild those stocks. While chinook is not a target species for us generally, forfeiture of time and area due to weak chinook returns will cost our fleet millions of dollars in other species of salmon the next three years at least.

Sincerely,

Max Worhatch, President, United Southeast Alaska Gillnetters



Alaska Trollers Association

130 Seward #205
Juneau, AK 99801
(907) 586-9400 phone
(907) 58604473 fax
ata@gci.net

February 2, 2018

Dan Hull, Chair
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

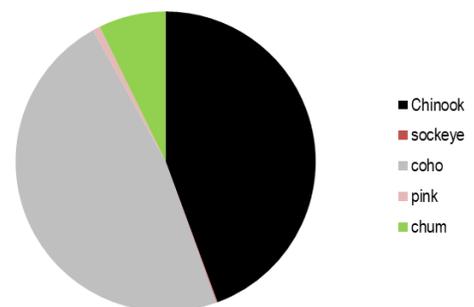
RE: Agenda Item C-3 GOA Catcher Vessel Chinook PSC Limit Adjustments

Dear Chairman Hull and Members of the Council:

I am writing on behalf of the Alaska Trollers Association (ATA) regarding Chinook salmon PSC limits and management of non-pollock trawl fisheries operating in the Gulf of Alaska (GOA). Controlling Chinook salmon bycatch in the trawl fisheries is particularly important given ongoing sacrifices being made by Chinook salmon fishermen from California to Alaska. To that end, **ATA supports Alternative 1 - No Action.**

ATA represents the interests of hook and line salmon fishermen who fish in both state and federal waters off the coast of Alaska. The troll fleet is one of the largest in the state and is 85% resident. Trollers make up the majority of permit holders in nearly all Southeast Alaska communities and of the active permits, 89% are currently being fished by residents. Roughly one of every 35 people in Southeast works on the back deck of a troll boat. **Trollers are highly reliant on Chinook salmon.** The annual exvessel value of troll caught Chinook has exceeded \$32 million and 10% of the entire statewide salmon value. Alaska's general fund and communities receive between \$800K - \$1 million in fisheries business tax revenue from the troll industry each year. **Chinook salmon comprises roughly half of the fleet's annual earnings.** This week, exvessel price for winter Chinook is over \$12; about \$136 per fish.

Ex-vessel value from 2007 to 2016
for the Salmon Troll Fishery



CFEC. 2018

From 2009 to 2010 Chinook bycatch in the GOA trawl fishery increased nearly 600% and our members expressed deep concern. Since that time, ATA has called on the Council to

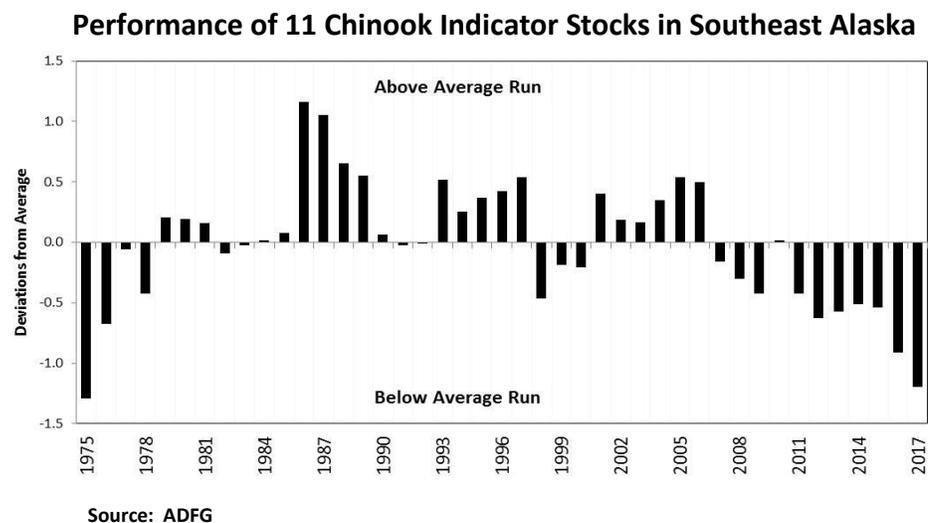
implement hard caps and other measures to control trawl salmon bycatch. Guiding our comments have been the twin goals of controlling bycatch and providing reasonable fishing opportunity for GOA trawlers. While we understand well some of the problems confronting the trawl fleet as lined out in the C-3 briefing document, *Initial Review Draft for Chinook PSC in the GOA*, **ATA is unconvinced that the trawl fleet should be allowed to increase its PSC caps at this time; particularly given the hardships currently being imposed on the directed fisheries to recover depressed stocks from Southeast and elsewhere.** Abundance of some of the Chinook stocks the troll fleet targets has been high in recent years, particularly Columbia River fall Chinook, and we have seen disruption and early closures in the troll fishery as a result. **We suspect this abundance has also contributed to trawlers reaching their caps early. Abundance is returning to normal, so the problems leading to a request to increase caps may no longer be at issue.**

As the current data reveals, many of the tagged or GSI sampled Chinook picked up in the trawl fishery come from a variety of jurisdictions that are governed by the Alaska Board of Fisheries (BOF), Pacific Salmon Treaty (treaty), Department of Fisheries and Oceans (DFO), the Endangered Species Act (ESA), and two Regional Council (NPFMC / PFMC) fishery management [plans](#). **Of the Alaska stocks that comprise the Chinook PSC, a high proportion comes from river systems in Southeast.**

Chinook stocks in Southeast are experiencing a period of low productivity not seen in our region for 40 years. Escapements in 2016 and 2017 were the worst on record; nine of eleven indicator stocks failed to meet escapement goals. 2016 saw a near total run failure from

Copper River to Dixon Entrance. In 2017, just two of 34 Chinook stocks in Southeast made goal, despite low fishery exploitation rates and extraordinary actions being taken by and ADFG. While the forecast for 2018 is grim, it is theorized that the low production is

due to marine survival for one brood year of fish. 2018 and 2019 are critical years for this brood, as the important 5 and 6 year old fish will be returning.



In January 2018, the BOF listed three Chinook stocks and one sockeye stock as ‘stocks of management concern’ under the Sustainable Salmon Policy.^{1,2} Additional concern was

¹ [Sustainable Salmon Policy](#)

expressed for all Southeast Chinook stocks and the expectation is that ADFG will manage aggressively in an attempt to avoid stock of concern designation for any other Chinook stocks in the region. **Wild Southeast Chinook stocks contribute 5% to 15% of the troll fleet's annual harvest** and 7% to 31% of the sport fishery harvest.³ **The sampling rate for troll caught Chinook in the Southeast troll fishery is typically 35-40% each year.**

A 2015 genetic stock composition analysis by Guthrie, et al. revealed a presence of Southeast Chinook stocks in the salmon bycatch of trawl fisheries off Alaska in the following proportions: 14% GOA pollock; 5% GOA rockfish; and, 12% GOA arrowtooth flounder.⁴ While GSI data is relatively new, and proportions will no doubt change year to year, there is no denying that the GOA trawl fisheries harvest Southeast stocks.

Since the mid-70s, Southeast Alaska fishermen have endured significant conservation restrictions to rebuild Chinook salmon from Alaska, British Columbia, and the Lower 48. For reasons of both conservation and allocation, the treaty Chinook quota in Alaska is extremely low. In 1985, trollers and the state of Alaska were told that the treaty rebuilding program, combined with Alaska hatchery production, would restore Southeast Chinook harvests to more than 500,000 fish by the year 2000. Despite the often strong abundance of far north migrating stocks that our fleet has relied on for over 125 years, that goal remains elusive. The impact of chronic low quotas in our region has been the significant disruption of the troll fleet and Southeast communities.

When the Council began the GOA trawl salmon bycatch discussion in 2010 the Southeast Chinook quota was the 7th lowest since treaty signing (1985) and more than 40K fish less than the original treaty *rebuilding* quota of 263K. Since 2011, there has been no directed harvest of Chinook salmon under the treaty's Transboundary River agreement on the Stikine and Taku stocks. This has resulted in a loss to fishermen from both Southeast Alaska and British Columbia. **The 2017 all-gear Chinook quota in Southeast was just 209,700 fish - the 8th lowest treaty quota ever.** Other fleets along the coast have suffered substantially from a lack of Chinook, many of which are caught in the GOA trawl fisheries.

On top of highly restrictive quotas, trollers are suffering a number of added measures to protect Southeast Chinook stocks. **Trollers in the southern Southeast districts have been cut back during spring fisheries for the past four seasons. In 2017, the troll fleet was closed regionwide for over two weeks and in the southern districts for a solid month of spring fishing.**⁵ **The troll fleet was forced to forgo additional 31,000 fish when ADFG's commissioner elected not to open the second half of the summer Chinook fishery, to protect Chinook stocks.**⁶ **All other commercial and sport fisheries**

² [BOF Action Plan: Unuk, Chilkat, and King Salmon Rivers, 2018](#)

³ [ADFG Chinook Origins Memo, p.3.](#)

⁴ [Genetic Stock Composition Analysis of Chinook Salmon Bycatch Samples from the 2015 Gulf of Alaska Trawl Fisheries. C.M. Guthrie, III, et al., NMFS, January 2017](#)

⁵ 2017 Spring Troll Announcements [#1](#), [#2](#)

⁶ [August 7, 2017 Troll Announcement](#)

have seen the impacts of conservation management in Southeast Alaska; most particularly in the Juneau, Douglas, and Haines areas. Those areas harvest Taku River salmon, which are known to transit the GOA.

In 2018, every fleet in the region will see even deeper restrictions to protect Southeast stocks.² Cuts will begin with the closure of the valuable winter troll fishery on March 15th - 45 days early. Trollers may be allowed to fish small, heavily restricted areas in spring for Alaska hatchery stocks, but **most of the region will effectively be closed to trolling from March 15 to July 1.**

Chinook stocks and dependent fisheries in other GOA areas have also seen their share of struggles and caps in the GOA were originally aimed at providing assistance for those stocks. Ongoing genetic stock identification studies should help to provide essential data on Chinook salmon stock composition, run timing, and annual variation in the GOA, which will help to better define the impacts of trawl bycatch on various stocks and salmon fisheries. It should also help improve trawl management, by providing the information necessary to craft practical options to help trawlers avoid Chinook salmon. At this point, these data sets are rather thin and there is much yet to learn. **This is not the time to make changes to management or modify the caps.**

ATA supports a long-term plan to reduce Chinook salmon bycatch. Modifying the hard cap just a few years into the program and during this period of low productivity in Southeast makes no sense. Please support Alternative 1 - No Action.

Thank you for your participation in the Council process. ATA appreciates your dedication and service to the nation's fisheries resources and fish dependent communities. If we can provide additional information, or otherwise be of assistance on this or other issues, please feel free to contact me.

Best regards,

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

Executive Director



Alaska Whitefish Trawlers Association

PO Box 991, Kodiak, Alaska 99615

Phone: (907) 654-9888 | website: alaskawhitefishtrawlers.org

February 2, 2018

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

Submitted electronically via: comments.npfmc.org

Re: Agenda Item C3 – GOA CV Chinook Limit Adjustments

Alaska Whitefish Trawler Association (AWTA) is a Kodiak-based trade organization representing independently owned trawl catcher-vessels fishing in the Gulf of Alaska and Bering Sea. AWTA member vessels primarily home-port in Kodiak, deliver groundfish to Kodiak processors 11 months out of the year, and contribute significantly to Kodiak being consistently ranked within the top 5 ports in the nation by volume.¹ The majority of AWTA crew members and skippers reside in Kodiak and they, along with our vessel owners, have a vested interest in ensuring that Kodiak has a healthy economy and stable fishing industry.

Moving forward with this action will provide more stability and flexibility to the GOA trawl fleet, shore-based processors and the community of Kodiak. The Council initiated this action after recognizing that chinook PSC limits set by Amendment 97 may have been too low, in light of new information that became available to the Council since 2014. All of the new limits proposed under this action continue to keep total chinook PSC limits below the 40,000 cap, and the analysis notes that none of the alternatives analyzed will cause significant adverse impacts to chinook salmon stocks (Analysis at 13).

As with Amendment 97 back in 2013/2014 this action requires the Council to balance several National Standards. The Council today has more information than it had when Amendment 97 was analyzed and approved. First, potential closures associated with Amendment 97 caps are no longer theoretical: only five months after implementing Amendment 97 the non-pollock non-Rockfish trawl fishery closed in May, 2015. According to NMFS the losses due to that closure were estimated at, “\$4.6 million in ex-vessel revenues and \$11.0 million in gross first wholesale revenues, in addition to indirect impacts on local employment, support service businesses, and public revenues.” (Analysis at 152) Kodiak would bear most of the closure costs because Central GOA trawlers depend on both winter and subsequent fall fisheries, while WGOA trawlers fish only in the winter season.

Second, ongoing efforts to provide the trawl fleet tools that would have allowed greater flexibility and more effective bycatch management through cooperatives and catchshares were stopped at the Council level in December, 2016. As noted in the Analysis in regards to Amendment 97, “*In selecting a relatively conservative limit, the Council noted that it was placing a potentially costly*

¹ According to the 2016 NOAA Fisheries of the United States report Kodiak is ranked #4, dropping from the #2 slot in 2015. Groundfish deliveries by trawl vessels represent 60% of all fish across Kodiak’s dock annually.

conservation burden on the trawl sector, and that additional management measures to help the trawl sector minimize its PSC more effectively would be developed.” (Analysis at 150) In lieu of a comprehensive program this action will provide relief and stability to the GOA trawl fleet.

Third, new data suggests much higher chinook rates in the Western GOA trawl fisheries than previously believed. Original limits gulf-wide were set based on assumed WGOA chinook usage of 100 chinook per year. After implementation of the restructured observer program in 2013 PSC chinook rates in the WGOA were documented at 7 times higher than originally assumed in the analysis, and peaked at a high of 1,686 chinook taken in 2017. (Analysis Table 58, page 124)

Fourth, multi-year genetic information² shows that chinook caught in GOA pollock trawl fisheries are primarily from British Columbia³ (51%), West Coast U.S. (32%), Coastal Southeast Alaska (14%), and Northwest Gulf of Alaska stocks (3%). Additionally, the Council has requested further information⁴ regarding hatchery contributions to the total chinook salmon bycatch, which would appear to be significant based on the information available and referenced above. Data gathered in cooperation with industry participants in the Rockfish program is also consistent with the stock of original proportions noted above, although it is not discussed in the analysis.

Amendment 103 allowing reapportionment between GOA trawl fisheries is a partial solution, but still does not address the fact that the original chinook PSC limits set through Amendment 97 were based on inaccurate assumptions and are likely too low to allow the trawl fisheries to successfully operate in future years. It also does not address challenges of high volatility associated with extrapolated data from basket samples, the risks of a lightning strike or the fact that samples are small and chinook are a rare species. Costs of closures due to chinook PSC caps will be borne primarily by Kodiak because of the dramatically different fishing patterns between the Western and Central GOA. Kodiak trawlers in the Central GOA are dependent on a fall flatfish and cod fisheries, whereas Western GOA trawlers participate only in winter fisheries and are unlikely to be impacted significantly, if at all, by any mid-season closures.

Moving forward with this action will provide much needed flexibility to the GOA trawl fisheries and increase the changes they can continue operating without mid-season closures. Flexibility is proving to be more and more important to sustaining viable fisheries; creating boxes that are too small, and based on historical information that may look may different from the future, is likely to cripple an already struggling GOA trawl fishery and cause great economic harm to Kodiak.

Creating a cooperative management structure in the GOA would have provided the fleet with tools to better operate under lower PSC caps and adapt to even more future uncertainties, such as changing ocean temperatures and conditions, sharp shifts in available fish stocks (such as pacific cod) and other future unknowns that are not reflected in historical data but can have significant

² The report on chinook genetics and stock of origin from samples collected in 2014 became available in April, 2016 to the Council. See Analysis at 39 and NPFMC April 2016 Meeting.

³ Percentage breakdown based on 2,414 Chinook salmon bycatch samples taken during the 2015 GOA Pollock trawl fisheries, and are consistent with results from 2014 samples. Guthrie et al. 2016

⁴ North Pacific Fishery Management Council, C3 Salmon Genetics motion, April 7, 2017

Alaska Whitefish Trawlers Association
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impacts on the trawl fishery. However, as this type of management structure is not an option currently on the table, this proposed action is vital to ensure the continued existence and success of the GOA trawl fisheries.

Thank you for your consideration and the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Rebecca Skinner". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Rebecca Skinner, Executive Director
Alaska Whitefish Trawlers Association

C3 GOA Chinook PSC
PO Box 232 Petersburg AK, 99833

Petersburg Vessel Owner's Association
(907) 772-9323 email: pvoa@gci.net

February 2, 2018

North Pacific Fishery Management Council
Dan Hull, Chair
605 W Ave. Suite 306
Anchorage, AK 99501
npfmc.comments@noaa.gov

RE: C3 GOA Chinook PSC

Dear Chairman Hull and Council Members,

PVOA's mission statement is to:

"Promote the economic viability of the commercial fishing fleet in Petersburg, promote the conservation and rational management of North Pacific resources, and advocate the need for protection of fisheries habitat."

PVOA reviewed the analyses to increase the Prohibited Species Cap (PSC) for Chinook salmon in the non-pollock trawl fisheries and is opposed to *Alternative 2* and *Alternative 3* that would increase the cap.

Last month, during our Southeast Board of Fisheries Finfish meeting in Sitka, three of the 11 Chinook salmon rearing rivers assessed by ADF&G were designated as 'Stocks of Concern.' These are the Chillkoot River, Unuk Riner, and King Salmon River. Furthermore, as you'll see on the next page, only two of the 11 Chinook index streams in Southeast Alaska met their escapement goals in 2017¹.

During the Board of Fisheries, major action plans were adopted for the subsistence, personal use, and commercial troll, gillnet, and purse seine fisheries in order to protect Chinook salmon.

According to the analysis and the most recent available data on GOA PSC caught Chinook stock genetics, *'roughly 15% come from Southeast Alaska (page 14).'* While Chinook stocks are being rebuilt, we ask the Council ensures PSC fisheries help share in our conservation measures.

The analysis also outlines the dramatic decrease in Chinook salmon abundance in Southeast Alaska in recent years.

'Preliminary estimates indicate that 2 of the 11 Chinook salmon index systems monitored in Southeast Alaska met or exceeded the lower bound of spawning escapement goals. This was a reduction from 2015, when 9 of the 11 index systems were within BEG goals. The 2 river systems that were within BEG ranges in 2016 were the Keta River, a clearwater stream located on the south end of Misty Fjords National Monument near Ketchikan, and the King Salmon River, a small non-glacial system located near the head

¹Heinl, S. C., E. L. Jones III, A. W. Piston, P. J. Richards, L. D. Shaul, B. W. Elliott, S. E. Miller, R. E. Brenner, and J. V. Nichols. 2017. Review of salmon escapement goals in Southeast Alaska, 2017. Alaska Department of Fish and Game, Fishery Manuscript Series No. 17-11, Anchorage.

of Seymour Canal on Admiralty Island (page 51).'

And also points out,

'the near-term outlook for southeast Alaska is not positive as very few "jacks," typically a strong indicator of future production, were seen in 2016, and escapements to most systems in 2017 were historically low despite restrictions to fishing. Runs in this region are expected to remain low in 2018 (page 57).'

Table 1.—Southeast Alaska Chinook salmon escapement goals, 2012–2016 escapements, and escapement goal recommendations.

System	Assessment method	Goal type	Escapement Goal ^a	Year established	Escapement					Escapement goal recommendation
					2012	2013	2014	2015	2016	
Blossom River ^b	HS, IE	BEG	150–300	2012	205	255	217	166	135	Expand to total escapement 500-1,400
Keta River ^b	HS expansion	BEG	175–400	2012	793	987	840	642	522	Expand to total escapement 550-1,300
	HS, IE	BEG			241	493	439	304	446	
Unuk River	HS expansion	BEG	1,800–3,800	2009	725	1,484	1,321	915	1,342	No change
	HS/FS expansion	BEG			956	1,135	1,691	2,623	1,463	
Chickamin River ^b	HS/FS, IE	BEG	450–900	1997	444	468	652	581	203	Expand to total escapement 2,150-4,300
	HS/FS expansion	BEG			2,109	2,223	3,097	2,760	964	
Andrew Creek	FS expansion	BEG	650–1,500	1998	587	920	1,261	796	402	No change
Stikine River	MR	BEG	14,000–28,000	2000	22,327 ^c	16,783 ^c	24,366 ^c	21,597 ^c	10,343 ^c	No change
King Salmon River	FS expansion	BEG	120–240	1997	155	94	68	50	149	No change
Taku River	MR, HS expansion	BEG	19,000–36,000	2009	19,538 ^d	18,002 ^{e,f}	23,532 ^d	28,827 ^d	12,381 ^d	No change
Chilkat River ^f	MR	BEG	1,750–3,500	2003	1,723	1,719	1,529 ^g	2,456 ^g	1,380 ^g	No change
	Weir expansion	BEG			3,027	4,992	3,357	5,697 ^g	2,574 ^g	
Alesek River ^h	Weir	BEG	3,500–5,300	2013	3,027	4,992	3,357	5,697 ^g	2,574 ^g	No change
Klukshu (Alesek) River ^h	Weir	BEG	800–1,200	2013	693	1,227	832	1,388	646	Eliminate
Situk River	Weir	BEG	450–1,050	2003	322	912	475	174	329	No change

Note: AS = aerial survey, FS = foot survey, HS = helicopter survey, IE = index escapement, MR = mark-recapture, BEG = biological escapement goal; gray cells indicate lower bound of the escapement goal not met.

^a Goals and escapement numbers for Chinook salmon are for large fish (≥660 mm mid eye to fork length, or fish age 1.3 and older), except Alesek and Klukshu goals which are germane to fish age 1.2 and older and can include fish <660 mm mid eye to fork length.

^b Escapement goals for Blossom, Keta, and Chickamin river Chinook salmon are index counts expanded to estimates of total escapements based on factors developed from mark-recapture studies.

^c Preliminary estimate pending publication of final report.

^d Estimates are based on mark-recapture studies.

^e Estimates are based on expanded peak aerial survey counts.

^f The Chilkat River Chinook salmon escapement is the mark-recapture estimate of inriver run minus reported subsistence harvest. The inriver goal of 1,850–3,600 (5 AAC 33.384) is directly measured through mark-recapture and is not discounted for inriver subsistence harvests that average <100 fish.

^g Alesek and Klukshu river Chinook salmon escapement goals were bilaterally agreed upon in 2013 (TTC 2014). Escapement to the Alesek River is calculated through expansion of the Klukshu River inriver run by a factor of 4.0 and subtraction of any inriver harvests above Dry Bay in the lower Alesek River.

While a slight increase was seen in Westward Alaska in 2016, Chinook salmon stocks have remained below average throughout the state of Alaska since 2007. PVOA does not believe it is an appropriate time to raise the non-pollock trawl PSC cap. Amendment 103 gave NMFS the authority to reapportion Chinook salmon PSC inseason, between trawl sectors, on their own discretion. This action was implemented in 2017 as a management tool to prevent a situation where a sector could not meet an unexpected need for Chinook PSC. We ask this program is given more time to determine if it is sufficient before increasing the cap.

Respectfully,

Megan O'Neil

Megan O'Neil
Executive Director



Southeast Alaska Fishermen's Alliance

9369 North Douglas Highway

Juneau, AK 99801

Phone: 907-586-6652

Email: seafa@gci.net

Fax: 907-523-1168

Website: <http://www.seafa.org>

February 1, 2018

North Pacific Fishery Management Council

Dan Hull, Chair

605 W. 4th Ave, Suite 306

Anchorage, AK 99501

Dear Chairman Hull and Council Members,

RE: C3 GOA Non-Pollock Trawl Chinook PSC Limits

Southeast Alaska Fishermen's Alliance (SEAFA) has reviewed the Initial review draft for GOA Chinook PSC Limits and is opposed to increasing the PSC salmon caps for the Gulf of Alaska non-pollock trawl fishery. The Board of Fish and Alaska Dept. of Fish and Game this board cycle recommended and adopted 3 Chinook salmon rivers and 2 sockeye rivers as management stocks of concern¹ in Southeast Alaska. According to the analysis roughly 15% of the Chinook salmon came from Southeast stocks based on the most recent available data from genetic stock of origin analyses.²

The Chinook rivers listed as a stock of concern are the Chilkat River, Unuk River and King Salmon River. In addition, of the 11 Chinook index stocks only two made their escapement goal in 2016 (King Salmon & Keta) and 2017 (Situk & Keta). The preliminary 2018 forecast for four (Chilkat, Taku, Stikine, & Unuk) of the Southeast Chinook stocks are the **worst forecasts** on record and if accurate, even with no harvest, the escapement goals will be missed.³ Major actions were taken in Southeast to protect Chinook salmon in the subsistence, personal use,

¹ [Sustainable Salmon Fishery Policy](#) "management concern" means a concern arising from a chronic inability, despite use of specific management measures, to maintain escapements for a salmon stock within the bounds of the SEG, BEG, OEG, or other specified management objectives for the fishery; a management concern is not as severe as a conservation concern"

² Page 14

³ [Board of Fish Oral Report](#) RC-3, Tab 20, page 68

recreational and commercial fisheries to help the returns but every fish will be important while these stocks are being rebuilt.

STOCK	2018 FORECAST	AVG RUN	ESCAPEMENT GOAL RANGE	
Chilkat	1,030	2,830	1,750	3,500
Taku	4,700	28,700	19,000	36,000
Stikine	6,900	24,550	14,000	28,000
Unuk	865	3,780	1,800	33,880

While Chinook stocks in Alaska are at low levels across the state it is not the time to raise Chinook caps in the non-pollock trawl fisheries in the Gulf of Alaska particularly when National Marine Fisheries Service (NMFS) was granted reapportionment authority under Amendment 103. This action was put in place in 2017 and more time should be allowed to determine if this authority is sufficient in order to deal with unforeseen spikes in Chinook harvest.

Southeast Alaska Fishermen’s Alliance is a multi-gear/multi-species organization representing our members involved in the salmon, crab, and shrimp fisheries of Southeast Alaska and longline fisheries in Southeast and the Gulf of Alaska.

Sincerely,



Kathy Hansen
Executive Director